



Revision

04

Date

12/12/22

## **INTEGRATED QUALITY, ENVIRONMENT AND SAFETY MANAGEMENT SYSTEMS POLICY**

The company Pometon S.p.A. in coherence with the guidelines expressed by the shareholders and in continuity with its commitment to an integrated management of the requirements indicated by the main international standards (UNI EN ISO 9001, UNI EN ISO 14001, UNI ISO 45001), in accordance with the provisions of Annex B of Legislative Decree no. 105/2015 (Major Accident Risk) and in accordance with the provisions of the European Regulation EU 2017/821 (Conflict Minerals) considers the quality of products and services provided, environmental protection, occupational health and safety protection and prevention of major accidents as important strategic elements in the development of its activities, in order to stimulate the continuous improvement of its know-how and the enhancement of its assets.

With this in mind, Pometon S.p.A. is constantly working towards the full realization of the essential goal of consolidating over time an integrated vision of organizational quality that places on the same level the quality of products and services, the quality of workplaces, working methods, the quality of the environment as well as ethical acting in accordance with the principles of honesty, fairness and respect.

The constant effort in the pursuit of occupational health and safety is embodied in the commitment by Pometon S.p.A. to ensure an ever-higher level of safety for every activity that involves risks for employees, customers and the community, passing through the conscious involvement of all company actors, from top management to individual workers, in prevention activities (defining and implementing prevention measures, training and analysis of results), thus fostering the consolidation of the culture of prevention and safety in order to ensure increasingly ambitious levels of protection and a constant decrease in accidents and injuries.

To implement and keep active its integrated management system, Pometon S.p.A. is committed to:

- meet the needs of customers in addition to compliance with agreed contractual requirements to the understanding of needs;
- promote the continuous improvement of its products and the enhancement of its know-how in relation to aspects pertaining to quality, environment and prevention and safety in the workplace and prevention of major accidents;
- ensure specific legislative compliance and compliance with the signed requirements over time;
- define measurable objectives of continuous improvement, consistent with corporate strategies, making available the means and resources necessary to pursue them; involve, sensitize and inform its employees, through training and internal communications, making them responsible for the contribution that each one can make in terms of quality of the service provided, environmental protection, consolidation of the culture of risk prevention for the realization of healthy and safe work situations;
- make the most rational and efficient use of natural resources by reducing consumption where possible and decreasing pollutant emissions and impacts in the air, soil, and surface and groundwater;

- empower and raise awareness among its suppliers, defining criteria relating to the quality of services offered and the protection of the environment and health and safety in the workplace and the prevention of major accidents that constitute contractual constraints and including specific requirements in the processes of purchasing and procurement of materials, products and services;
- comply with specific legislative requirements related to the risks applicable to its establishment in terms of accident prevention and control, for the protection of human health, the environment and property;
- Comply with the requirements of EU Regulation 2017/821 in the procurement of 3TG minerals from conflict or high-risk areas (Conflict Minerals Management System);
- develop strategies and implement interventions to support and enhance the confidence of all shareholders consistent with the context and risk analysis with a view to maintaining business continuity;
- with regard to the presence of major accident hazards (RIR), the Management aware of the related risk adopts all the tools already used in the safety and environment field in order to manage and control the process so that the balance between corporate interests and the protection of people inside and outside the company is created in order to preserve material, physical and environmental safety.
- The RIR management system is structured through the following points:
  - a. Organization and personnel
  - b. Identification and assessment of risks
  - c. Operational control
  - d. Change management
  - e. Contingency planning
  - f. Performance monitoring
  - g. Monitoring and review

Each point is managed through several specific tools that oversee the collection and analysis of performance data, as well as appropriate methods of prior routing to the implementation of new facilities and layouts.

Please refer to the specific documents and attachments in the information system in order to detail the various activities covered (filling out inspection reports forms, making near miss reports forms, forms for assessing impact from new facilities or modifications). The M-RIR manual constitutes an operational reference point for the management of the activities.

- Regarding the previous point, the company adopts systems of industrial risk analysis related to the use storage and handling of substances at risk of major accidents, collection and analysis of information and data specific to the activity, adoption of tools for risk mitigation.
- The Management decides to adopt, in addition to the provisions of the Law, also regulatory guidelines taken from UNI and available on company information system.
- Management drafts and implements the following RIR management procedures:
  - PRIR\_001: Identification and assessment of major accident hazards.
  - PRIR\_002: Preliminary hazard analysis
  - PRIR\_003: Hazard analysis
  - PRIR\_004: Safety regulation management
  - PRIR\_005: Material safety data sheet management
  - PRIR\_006: Seveso materials inventory management

Commitments made, aimed at meeting the requirements of Pometon S.p.A.'s Integrated Management System, are translated into objectives, targets and programs that can be measured and monitored periodically.

Once a year, during the Integrated Management Review, their achievement is checked against specific indicators compared with the previous year and the target where present. During the year, at different intervals, the same or additional performance indicators are monitored to ensure adequate responsiveness of Pometon S.p.A. to customer satisfaction.

The Integrated Policy is disseminated through postings at headquarters and is communicated with use of information technology to all personnel and stakeholders, thereby promoting awareness and verifying understanding and application.

CEO  
R. Clayton

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Manager  
A. Breda

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RLS  
U. Manganaro

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Maerne, 12.12.2022