

POLICY DOCUMENT FOR MAJOR ACCIDENT PREVENTION

Lainate Plant

Introduction to the Document

This document is prepared by the Manager and reviewed biennially in accordance with Article 14 and Annex B of Legislative Decree 105/2015. It contains and describes:

- The general principles of the Major Accident Prevention Policy.
- The company's objectives in the field of major accident prevention and control.
- The commitment to maintaining a Safety Management System as required by Article 14 of Legislative Decree 105/2015.
- The structure of the adopted Safety Management System with its guiding principles and criteria.
- The improvement plan for the Safety Management System agreed upon with collaborators, including timelines for its implementation.

General Principles

CAVENAGHI S.p.A. embraces the guiding principle of the European Directive 2012/18, which states that the safe operation of an installation depends on overall management criteria. The adoption of a Safety Management System is deemed fundamental for preventing major accidents.

The Safety Management System of CAVENAGHI S.p.A. (SGS) is formalized through this document and structured as described in one of the following sections.

Objectives

The primary objective of CAVENAGHI S.p.A. is to balance the protection of the health and safety of people (employees and residents near the plant) and the environment with its corporate goals through actions aimed at preventing major accident risks. The specific objectives are to:

- Ensure that the risk of major accidents, understood as the combination of probability and severity of effects, is compatible with current regulations and the state of knowledge and technology.
- Guarantee compliance with existing laws and national and international standards.
- Promptly adapt to new legal provisions or safety standards.
- Constantly demonstrate commitment to safety, major accident risk prevention, health, and environmental protection.
- Disseminate and implement the Major Accident Prevention Policy at all levels.

Commitments for the Prevention of Major Accident Risks

To achieve the described objectives, the company commits to:

- Identify existing risks and constantly redefine objectives and tools for continuous safety improvement, periodically verifying their implementation status.
- Organize human resources in terms of skills, decision-making autonomy and responsibilities.
- Promote and share this document and safety objectives by involving all personnel.
- Ensure necessary resources for technical, organizational, and managerial interventions aimed at continuous safety improvement, compatible with the company's economy.
- Inform, train, and instruct all personnel on potential risks related to activities.
- Apply monitoring and verification procedures to control the implementation of this Policy.
- Ensure that third-party personnel adopt behaviors and procedures consistent with this Policy within the plant.
- Design and operate plants in a manner compatible with the protection of safety, health and environment.

- Cooperate with public authorities on any issues that may arise concerning major accident risks and emergency management procedures.

Structure of the Safety Management System (SGS)

The Safety Management System (SGS) is structured according to the principles of Annex III of Directive 2012/18/EU, listed in Annex 3 of Legislative Decree 105/2015.

The formalized procedures cover:

1. **Organization and Personnel:** management of procedures and documentation; organizational charts, job descriptions and definition of responsibilities; collection, archiving, and distribution of legal provisions; management of legal documentation and compliance, and relations with public administrations; training and information activities; access and circulation of vehicles and people, surveillance service, safety regulations; procurement and contracts; signage; management of PPE - personal protective equipment and DPC - collective protection devices.
2. **Identification and Evaluation of Major Hazards:** technical documentation; preliminary hazard analysis (PHA); risk analysis of accidents (AR).
3. **Operational Control:** rules and operating procedures; departmental manuals; equipment and machinery user and maintenance manuals; safety regulations; Work Sheets; departmental registers; maintenance and work on plants; Work Requests, Work Permits.
4. **Modifications and Design:** design activities (new plants, expansions and interventions); management of modifications; management of modification works by third parties and contractors; inspections, tests and start-ups.
5. **Emergency Planning:** PEI - Internal Emergency Plan; management of emergency equipment/materials; management of first aid kits; accident management.
6. **Performance Control:** periodic audits; control of equipment and plants subject to legal checks; periodic tests of critical components and fire/emergency equipment; accident, incident and near-miss analysis; management of non-conformities to the SGS.
7. **Control and Review:** periodic safety meetings, verification of the effectiveness of the SGS.

Integration of the Safety Management System (SGS) with Other Company Management Systems

Since September 1995, CAVENAGHI S.p.A. has obtained the Quality Management System (SGQ) certification from Certiquality, currently conforming to the UNI EN ISO 9001:2015 standard, and since March 2007, the Environmental Management System (SGA) certification, currently conforming to the UNI EN ISO 14001:2015 standard.

Where possible, efforts are being made to integrate the different company systems - SGQ, SGA and SGS - into the Integrated Management System (SGI) with consequent rationalization of procedures and documentation in general.

Safety Management System improvement plan

An improvement plan for the prevention of major accident risks has been prepared and approved by the Manager. This plan details the activities and investments planned for the next two years to improve safety and is included in the company's Integrated Management System (SGI) improvement plan. The improvement plan is annexed to this document and constitutes an integral part of it.

Lainate, May 28, 2024

THE MANAGER
DOTT. MASSIMO BALCONI

