

MAJOR ACCIDENT PREVENTION POLICY

San Zeno Naviglio plant

Travi e Profilati di Pallanzeno S.p.a. – whose San Zeno Naviglio plant (BS) is classified as "Lower Threshold Plant" pursuant to Legislative Decree no. 105/2015 - considering the protection of health, the environment and safety at work and the prevention of major accidents as an essential objective to be achieved and constantly improved, the aim of this document is to:

express its will to reconcile the needs of economic development and value creation with the protection of health, the environment and safety at work and the prevention of major accidents;

make explicit the company guidelines for such protection and prevention;

share with stakeholders (employees, employees, contractors, trade unions, institutions, citizens, etc.) the related management principles;

to encourage the participation and collaboration of all the parties concerned, in the awareness that their active contribution is crucial to the achievement of the objectives related to safety, environmental protection and the prevention of major accidents.

To achieve these objectives, the Company has developed a Safety Management System for the Prevention of Major Accident Risks (SGS-PIR), in accordance with the requirements of D. Lgs. 105/2015 (Annex 3 and Annex B) and as established by the standard UNI 10617, the effective implementation of which is aimed at ensuring that the objectives set in the policy are achieved, constantly monitored and renewed with a view to continuous improvement. The SGS-PIR shall be continuously updated on the basis of changes to the production cycle and/or the organisation and shall codify the planned audits to highlight major accident risk non-compliance and actions for their resolution. To achieve the objectives, the Policy provides for the allocation of adequate human and economic resources, which operate through a SGS commensurate to the complexity of the organization, as well as resources (plant, organizational and management) to ensure the efficiency of the devices and the implementation of the measures envisaged for the prevention and control of major accidents. The Major Accident Prevention Policy is implemented in the following management principles:

- a. to comply in full with the legislation (including any other requirements stipulated by the company), the reference legislation and the business procedures regarding safety, the environment and the risk of major accidents;
- b. use means and materials with characteristics which comply with current legislation;
- c. prevent, eliminate or reduce the risks of occurrence and the effects of any major accidents, while ensuring a high level of protection of human health and the environment;
- d. promote and pursue, with a view to continuous improvement and for all business activities, the prevention and control of major accidents, with the support of the Sgms (providing them, where necessary, appropriate tools);
- and. disseminate within the company, through a constant awareness-raising action, a culture aimed at understanding the Policy and the implementation of correct forms of behaviour to prevent the risk of major accidents;

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Società a socio unico

Soggetta ad attività di direzione e di coordinamento di Duferco Italia Holding Spa, con sede a San Zeno Naviglio (BS), Via Armando Diaz 248 | Cod. Fisc. 06081270636 - Iscritta al Registro delle Imprese di BS nr. 06081270636.
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- f. developing at all company levels, through training and information and training, professional skills and commitment to work in accordance with the procedures defined within the SGS-PIR;
- g. work towards the achievement of a general awareness that the responsibility for the prevention of major accidents is entrusted to all workers, at the various levels of the company, each according to their own skills;
- h. ensuring the involvement and participation of staff in the process of "continuous improvement" of the SGS and in the prevention of major accidents;
- i. involve contractors operating within the establishment in the protection of health and in the prevention of major accidents, in particular through the communication of policy and objectives, and cooperation and coordination at all stages of the contractual relationship;
- j. to verify continuously the management of the prevention of major accidents, through the review of the above principles and the SGS-PIR, to be carried out annually, on the occasion of the review of the Direction.

This Policy is geared towards the prevention of major accidents and is a guide to the continuous improvement of safety and environmental performance and related Management Systems (including through the search for the constant updating of the technologies used and the best scientific knowledge); it is also the framework for the definition and review of objectives. The Beams and Profiles of Pallanzeno S.p.A. is committed to the implementation of the principles of the Policy of Prevention of Major Accidents and the objectives that derive from it and for this purpose provides the necessary structure and resources; it shall also regularly monitor the achievement of the objectives and, where necessary, promote appropriate corrective or improvement actions.

The SGS-PIR Policy also has a role of corporate communication document; to give it maximum dissemination, within the company this document is available to operators in the shared folder IT "Management Systems" and is exposed in the corporate bulletin boards, so that everyone is aware of their obligations regarding the prevention of major accidents; for all other interested parties it is available on the company website.

It is the responsibility of the Function Managers:

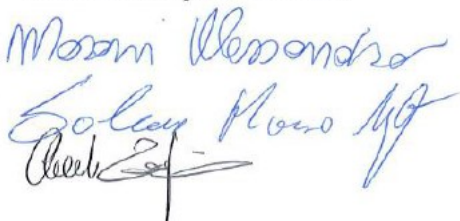
- verify that this document is understood by its collaborators and, if necessary, provide the requested clarifications;

- take appropriate measures to ensure that employees are able to perform their duties properly.

The Policy is defined by the Manager, and reviewed and revised at a maximum of two years, in order to understand the new intentions of the Management and/ or changes occurred. All workers, including permanently operating third parties, must operate in accordance with the Policy and company rules.

San Zeno Naviglio, 18/01/2021

Firma dei RLS per condivisione



Il Gestore

Rosario Tornello



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