

**ACCIDENT PREVENTION
POLICY,
SAFETY AND PROTECTION OF
HEALTH, ENVIRONMENT AND
ENERGY DOCUMENT.
OF ESSECO SRL**

(In compliance with Art. 14 and attachment B point 1 of Legislative Decree no 105/15 and further amendments)

1. INTRODUCTION

The ESSECO S.r.l. plant in San Martino di Trecate is within the scope of the Legislative Decree no. 105/15 and further amendments as further amended, pertaining the presence and presence in excess of threshold limit values of the following substances:

- Sulphur dioxide and 65% methanol (toxic)
- Ammonia in a solution (hazardous for the environment, as it can release ammonia vapours)
- Oleum (EUH014 reacts violently with water, causing development of toxic sulphur trioxide)

and presence, even if below threshold limit values of:

- Cryogenic oxygen (comburent)
- Anhydrous ammonia (toxic – released only for the time of unloading from the tank)
- Methanol

This Corporate Policy and the Safety Management System (SMS) developed by the Plant Manager therefore apply to the processes and activities carried out by ESSECO S.r.l. at the Trecate plant and pertaining to development, production by sulphur combustion, reaction and cristallization, and sale of sulphur derivatives: sulphur dioxide, sulphites, bisulphites, thiosulphates, hydrosulphites, chemicals products for the wine, food and industrial sectors, deicing products for airport runways. Development and production of sulphuric acid and

2. INSPIRING PRINCIPLES

Pursuant to the requirements of Legislative Decree no. 105/15 and further amendments, ESSECO S.r.l. adopts the inspiring principle which states that the safe operation of a production plant shall be guaranteed by the management criteria adopted integrating them with the worker's health protection goals set forth in Legislative Decree no. 81/2008 as further amended and by the environmental provisions set forth in Legislative Decree no. 152/2006 and further amendments.

This Quality Management System has been developed pursuant to the attachment B (Art. 14) of Legislative Decree no. 105/15 and further amendments (Guidelines for the implementation of Safety Management System for preventing risks of relevant accidents) and pursuant to the regulation UNI 10617:2019 and formalised via this document, the SMS Guide and the Operational Procedures/Instructions and it is also integrated within the Quality Management System developed pursuant to the UNI EN ISO 9001:2015 Standard and with the Environmental Management System the company has developed in compliance with the UNI EN ISO 14001:2015 standards and in compliance with the Health and Safety management system certified by the standard UNI EN ISO 45001:2023. Furthermore, it is written according to the UNI EN ISO 50001:2018 standard.

The Structure of the System described above is reported in Chapter 5 of this document. The actions described and depicted in the SMS documents are related as appropriate to the risk of relevant accident presently defined and evaluated.

Approval and issue of documents related to prevention and control of relevant accidents and protection of workers, population and environment to be entrusted to the Plant Manager. Any modification to the System caused by regulations, classification or changes in the type of danger posed by the substances may require a review of the Guide and Procedures/Operating Instructions.

ESSECO S.r.l. promotes cooperation with the Surveillance Bodies and the relevant Authorities to encourage mutual knowledge, exchange of information, development of shared

emergency procedures and optimising the controls to be carried out, adopting the prescriptions and observations provided by the Bodies and Institutions.

The Company also regards the attitude of its Collaborators towards Safety and prevention of risks of relevant accidents and protection of Environment and Workplace Health and Safety and improvement of energy performance as an essential element in evaluating their professional skills.

Lastly we clarify that ESSECO S.r.l. has adopted at the end of 2009 an Organisation and Management Model to prevent the crimes described in Legislative Decree no.231 of 2001 (corporate crimes, crimes against the public administration, crimes against people, handling stolen goods, laundering of money or assets of illicit origin...). The Company thinks that adopting this Model, while at the same time issuing the Ethical Code represents another step towards raising the awareness of all employees and collaborators for the purpose of ensuring that the behaviours adopted are correct and clear and in tune with the ethical and social values of the company and such to prevent the risk of committing the crimes indicated in the Decree.

Starting October 2013, Esseco has joined the Responsible Care program confirming its commitment to develop its business with a constant attention to the continuous improvement of Safety, Health and Environment.

Esseco has also decided to comply with the "Environmental Sustainability Charter" promoted by Confindustria.

3. GOALS

ESSECO S.r.l. is committed to developing its mission while maintaining constant focus on its safety performances in preventing risks of relevant accident, in preventing accidents/occupational illnesses and in preventing pollution and in improving energy performance.

*This is the scope of implementation of this **Accident prevention policy, safety and protection of health and environment and energy efficiency Document** that the company has defined, documented, undersigned and implemented in compliance with the following reference standards:*

- *Legislative Decree no. 105/15 and further amendments.;*
- *Legislative Decree no. 81/08 and further amendments.;*
- *Legislative Decree no. 152/2006 and further amendments.;*
- *Standard UNI EN ISO 14001:2015 ;*
- *Standard UNI EN ISO 45001:2023;*
- *UNI Standard 10617:2019*

Furthermore, the Policy Document is written according to the UNI EN ISO 50001:2018 standard "Energy management systems"

The Company acknowledges that research and obtaining the highest levels of safety and industrial security and protection of health and environment and improvement of energy performance are of the utmost importance, considering the results achieved in these fields as a key ingredient of the overall results achieved in company management. The Company also acknowledges that responsibility in relevant risk management and prevention as well as the responsibilities for workplace safety and health and the environment pertain to the whole corporate structure, from the Employer to all the employees, each according to their skills and duties.

The company's strategic and priority goals are the following:

- preventing risks for safety, health and environment, in particular the relevant accident risks pursuant to Legislative Decree no. 105/15, referred to the dangerous substances found in the Plant;
- reducing to the minimum all the types of impact related to accidents via accurate and proper application of the required protection measures;
- safeguarding the health of the workers, clients and population;
- protecting the environment, focusing on preventing pollution and promoting an efficient use of natural resources, with particular attention to the rational management of water and energy resources;
- the commitment to continuous improvement of energy performance;
- the commitment to ensure the availability of the information and of the required resources to achieve goals as far as energy is concerned;
- guaranteeing quality and safety of their products.

The Company's Policy in the issues of prevention and control of relevant incidents risk, workplace safety and health and environment requires that all these goals have been developed, pursued and maintained through systematic management of safety and environment in compliance with the inspiring principles and the EC, national and local provisions, undertaking to also comply with the applicable legal provisions, environmental provisions, uses and energy consumption, provisions on relevant incidents risk and provisions on safety and health required by the Organisation.

The Manager ensures that this Policy Document is always appropriate to the nature and measure of relevant accident risks, workplace safety and health and environmental impact, products and services carried out by the company, uses and energy consumption of the organization will be kept in operation, reviewed and re-examined (at least once every two years) for the purpose of ensuring that the Company may guarantee an updated reference framework suitable for establishing and reviewing safety, health and environment goals and for the improvement of energy performance taking into account the changes in circumstances and knowledge, thus ensuring that it remains consistent with the company's profile and appropriate.

4. MANAGER'S COMMITMENT

In order to pursue the general safety, health and environment policy and the improvement of energy performance, the Manager undertakes to:

- Develop, adopt and maintain a suitable Safety Management System, fully integrated with an adequate Environmental Management System for further improving the Health, Safety and Environment and Energy issues that are an integral part of their own company management system and that are implemented through formalisation of clear and consistently applied procedures, the planning of the relevant goals and the implementation of programmes whose results are verified over time through checks;
- Regard prevention of relevant accidents and workplace safety and health risks as well as environmental impact, the improvement of energy performance and the results in these fields as an integral part of company management and providing financial, human and instrumental resources needed to pursue company goals and continuous improvement of performances;
- Ensure full compliance to all requirements, included compliance to laws and other regulations (at local, national and EU level) as well as to company provisions on workplace safety and health, as well to all undertakings related to voluntary entering into other safety, health and environment protection programmes and energy efficiency;
- Identify and remove the dangers and evaluate and reduce the risks related to the activities of the Plant, taking into account the provisions of Legislative Decree no. 105/15 and further amendments and Legislative decree no. 81/2008 and further amendments;
- Carry out risk analyses focused at identifying, adopting and maintaining safety measures

suitable to prevent accidents and minimise the consequences and curtail the effects of the accidents keeping them within reasonable limits compatible with safety for the employees and the general population as well as protecting properties;

- *Plan, exercise, control, maintain and innovate systems, production processes and working stages so as to ensure their compliance with accident prevention measures. Furthermore, the Manager shall take care to employ suitable resources (technical, organisational or management) and all reasonable and sustainable measures to pursue the safety, health and environmental goals and energy efficiency;*
- *Support the design and the purchase of energy-efficient products and services to improve energy performance;*
- *Define the requirements needed to provide information, training and education for the employees at each level, both for their staff and the staff of third parties operating on the Plant so that they are aware of potential risks related with the activities they carry out and can therefore act responsibly;*
- *Develop and implement the measures suitable to guarantee that third parties operating in their Units adopt behaviour, praxes and similar measures consistent with the principles of this Policy;*
- *Involve its employees and the employees of third party companies that work in the Company premises in the sharing and shared pursuing of the goals set forth in this Policy Document, also by establishing specific training events; circulate in the company the workplace safety and health goals and the relevant implementation programmes;*
- *Ensure that employees are aware of and trained, to perform their jobs safely and to assume their responsibilities concerning health and safety at work;*
- *Guarantee availability of protection equipment, verifying their correct and accurate employment;*
- *Prepare Emergency Action Plans, Safety Equipment, Alarm Systems, human resources and training thereof, the quick intervention facilities needed to apply the protection measures in case of relevant accident in the Plant or in the Industrial Complex of S. Martino di Trecate;*
- *Consult and ensure worker participation, also via their workplace safety, health and environment representatives;*
- *Guarantee environment protection via compliance to all requirements, included applicable regulations and prescriptions and the training, education and information of the staff on these issues thus promoting an "environmentally responsible" behaviour;*
- *Ensure a constant, periodical review of the company's performance sin relevant accident, workplace safety and health and environmental risks;*
- *Carry out internal audits for the purpose of continuously verifying efficiency and effectiveness of the Management System used.*

In addition to the general commitments described above we hereby describe the activities that ESSECO S.r.l. shall specifically guarantee for the fulfilment of the goals related to the safety of the working equipment used and the products sold, the safeguard of workers' health and protection of the environment and the improvement of energy performance.

➤ SAFETY OF EQUIPMENT AND PRODUCTS SOLD

- *Design and purchase of equipment and devices featuring suitable resistance, suitability and protection for what concerns the needs of workplace safety;*
- *Implementation of suitable programmes of inspection and maintenance of installations for the purpose of ensuring maintenance of compliance to said requirements over time;*
- *Promotion of researches and studies aimed at identifying safety conditions required for manufacturing, handling, transportation, use and disposal of the products;*

- *Support to the customers in the application of safety measures required for manufacturing, handling, transportation, use and disposal of the products.*

➤ **PROTECTION OF WORKERS' HEALTH AND SAFETY**

- *Promotion of research, processing and implementation of the measures required to protect health;*
- *Implementation of periodical medical controls, for the purpose of verifying over time the maintenance of the workers' physical integrity as well as the validity of the technical prevention measures enacted;*
- *Zero tolerance on the use of alcohol and drugs by the employees, both during work and in the spare time (if said use may influence in any way in carrying out the tasks assigned to them).*

➤ **ENVIRONMENTAL PROTECTION AND IMPROVEMENT OF ENERGY PERFORMANCE**

- *Managing the plants in a way that protects the environment and preserves safety of the community, arranging the operational measures needed to guarantee in any moment the safe use and the ability to cope with any trouble;*
- *Increasing knowledge of production processes and of products and of their interactions with the environment and the energy and the significant effects deriving from them;*
- *Reducing the impact of production residues (atmosphere emissions, waste waters, solid waste) by adopting suitable actions including source reductions, rational recovery (especially of energy) and processing in specific plants;*
- *Use of the Best Available Technologies, if at all available, as required by Legislative Decree no. 152/06 as further amended;*
- *Monitoring and awareness raising of the suppliers to guarantee effective responses, keeping clearly in mind that the suppliers are key elements in the company goals, preferring cooperation with suppliers that pay more attention on the environmental impact of their activities and encouraging the purchase of energy-efficient products and services for the improvement of energy performance;*
- *Pursuing the goal of establishing an open, clear dialogue with all the stakeholders and at all levels of the organization, paying attention to communication, informing the staff about one's own environmental and energetic goals and progresses achieved;*
- *Commitment to spread and circulate this policy to all people that work for the Organisation and on its behalf and making it available to the public and to all the stakeholders;*
- *Improvement of the use of energy resources and raw materials via saving and recovery, monitoring all the consumptions;*
- *Enactment of a systematic control of all possible emergency situations, handling them according to specific procedures and scheduled intervention plans;*
- *Reduction and control of the most significant impacts.*

5. STRUCTURE OF THE SAFETY MANAGEMENT SYSTEM

In order to reach the general goals described and in full compliance with the inspiring principles adopted, ESSECO S.r.l. has structured the Safety Management System via the following documents:

- This document, that also contain the SMS Improvement Programme (2025-2027)
- SMS Guide
- SMS Procedures/Operating Instructions.
- Other procedures and Operating Instructions: management procedures/quality assurance or area operating instructions, Plants and systems manuals.

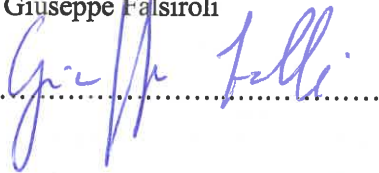
San Martino di Trecate, 06/08/2025

ESSECO S.r.l.

Il Datore di lavoro

(D.Lgs 81/08 e s.m.i.)

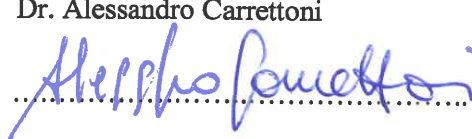
Ing. Giuseppe Falsioli

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Il Gestore

(D.lgs. 105/15 e s.m.i. - 152/06 e s.m.i.)

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