

ENVIRONMENT, HEALTH AND SAFETY



Namirial S.p.A.

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GENERAL INFORMATION

Documentary check

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Formal control

Edited by:	Reviewed by:	Approved by:
<i>HR/Compliance Team</i>	<i>Legal Team</i>	<i>BoD</i>

Version control

Version	Changes	Changes description	Date
1.0	Original	Document creation	22/10/2020
2.0	Update	References to 231 Organizational Model	28/02/2023

Access control

N.	Role	Reading	Reading and Editing
1	Legal Team		X
2	HR Team		X
3	Compliance Team		X
4	Employees	X	



1. INTRODUCTION

This Environmental, Health and Safety policy (hereinafter also "Policy") sets out Namirial S.p.A. (hereinafter also "Company") commitments on environmental protection, resource efficiency and the health and safety of our employees, contracts, customers and neighbouring communities. The Policy addresses the company's approach for operating in compliance with applicable local and national regulations on environment, health and safety (EHS). It also reflects our commitment to achieve or exceed good industry practice in these aspects of our performance.

The Board of Company has approved this Policy and has delegated responsibility for its oversight to the CEO: Mr. Massimiliano Pellegrini.

This Policy shall be read and understood in conjunction with the 231 Organization Model adopted by the Company (approved by way of resolution of the Board of Directors Meeting on 26.10.2022) and the related policies, including the Code of Ethics and Whistleblowing Policy.

1.1. Scope

The Policy applies to all operations under the direct control and responsibility of Company (including contractors working at the company's sites and premises) both domestically market and abroad.

All group companies and business units worldwide, including joint ventures where we have a controlling interest, are required to apply this Policy and its principles. Where we have a non-controlling interest, we should encourage the application of this Policy with our business partners. Existing business relationships should also be assessed from time to time.

In addition, this Policy must be considered when entering into new business relationships, either through mergers, acquisitions, joint venture or new customers and suppliers. Such new relationships require careful assessment of the EHS risks and performance of any business partner.

1.2. Document name and identification

This document is updated to the version resulting from the "Version Control" or "Documentary Check" referred to in the "General Information" of this Policy.

Company ensures constant verification and constant updating of the document that takes into account any subsequent regulatory updates.

Furthermore, Company undertakes to make this document known and available to all the employees and to all interested party, by providing a suitable training.



1.3. *Approvation rules*

The Board of Company has approved this Policy and has delegated responsibility for its oversight to the CEO: Mr. Massimiliano Pellegrini.

The responsible for updating this document are identified in the members of the HR and Compliance department.

1.4. *Organisation*

Below there are the company data of Company and related contacts:

COMPANY
Registered Office: Namirial S.p.A.
VAT number (IT): 02046570426
Phone: 071-63494
E-mail: info@namirial.com
Web Site: www.namirial.com



2. POLICY

2.1 Purposes

With respect to EHS matters, all operations and activities under the control of Company, no matter where in the world, shall be conducted so as to:

- a. Comply with applicable local and national regulations, legislation and standards.
- b. Meet any specific EHS-related criteria or 'green procurement' policies established by our customers, where the company has been informed of these and has made corresponding warranties and commitments.
- c. Take account of and meet recognized industry good practice on EHS issues in our specific sector.
- d. Meet the requirements of any EHS-related external certification schemes (such as ISO 14000 series) that the company has committed to maintain.
- e. Contribute to shareholder value by pursuing EHS objectives and targets (such as energy efficiency measures, the development of 'green' products or reductions in lost-time due to health and safety incidents) that help to increase productivity, product innovation, brand profile and market share.

2.2 Key EHS issues

'Environmental issues' as referred to in this Policy may include, but are not necessarily limited to, the following risks and opportunities:

- The efficient use of resources including energy, water and raw materials.
- The minimisation and management of solid waste and trade effluent.
- Safe storage and handling of hazardous chemicals.
- Minimisation and control of air and noise pollution.
- Control of noise pollution.
- Protection of surface waters (such as rivers and streams), sensitive habitats and endangered species that may be impacted by the company's operations.
- Product stewardship issues including indirect environmental impacts associated with the sources of raw materials that we depend upon and/or the use and end-of-life disposal of our products.

'Health and safety' issues as referred to in this Policy may include, but are not necessarily limited to, the following:

- Occupational health and safety of our employees and on-site contractors including control of industrial hazards and risks at our site[s]
- Road safety issues associated the transport of goods to and from our site[s]
- The health and safety of our customers when storing, using or disposing of our products
- The health and safety of our community and neighbours, including other business premises, residents, schools and other such stakeholders located in the vicinity of our operations.



2.3 Responsibility

The CEO is the main board director with primary responsibility for overseeing the implementation of this Policy and for reporting annually to the Board.

Company will establish appropriate EHS responsibilities, procedures and resources (also referred to as EHS Management Systems) within their operations to ensure that this Policy is fully implemented.

'Resources' may include, for example:

- A central register/log of the key EHS-related regulations that apply to the company and any site-specific EHS permits and licences that company is required to hold.
- Appropriate arrangements to track (and, if necessary, prepare the company to respond to) any anticipated changes in or tightening of applicable key EHS regulations; and/or developments in customers' 'green purchasing' requirements; and/or the company's competitive positioning with respect to the environmental credentials of other [service providers] [manufacturers] in our markets.
- The cost of staff training on EHS issues.
- Purchase and replacement of Personal Protective Equipment (PPE).
- Capital/operating expenditure for larger scale technical measures such as investments in energy efficiency or for the reduction of water consumption.

2.4 Mergers, acquisitions, joint ventures and associates

Periodically Company explores opportunities to acquire companies and to enter into partnerships and joint ventures. As part of the commercial and financial due diligence process of such transactions, the EHS status of any company we invest in or acquire, may need to be investigated or assessed to an appropriate level of detail. The focus and depth of such assessments must be decided on a case-by-case basis but may include, for example, investigations into the potential for historical contamination of soil/groundwater; assessments into the condition and future longevity of pollution control equipment; or reviews of the company's EHS management systems. We need to be sure what we may be inheriting.

2.5 Business interfaces

On a case-by-case basis, reviews may need to be undertaken on a regular basis to assess the EHS status and performance of third parties who provide services on behalf of the Company including contractors and other regular counterparties such as suppliers of goods or services (e.g. hazardous chemicals) that are inherently associated with potentially significant EHS issues.

2.6 Training

Training will be provided on this Policy and its implementation and will be tailored to the key EHS issues, risks and opportunities identified by the company. The training programme will encompass induction training for new employees as well as on-going/refresher training where needed.



2.7 Reporting

In addition to any statutory reports that the company is required to submit to EHS regulatory bodies, the CEO will ensure that the Board receives appropriate reports and briefings on EHS matters, including the following:

Incident reporting

The CEO will notify the Board as soon as possible in the event of any material negative developments. Examples include:

- significant breaches of applicable EHS regulations;
- actual or expected EHS enforcement notices, legal proceedings or fines;
- major pollution incidents;
- health and safety incidents resulting in serious injury or fatality;
- negative media articles, stakeholder complaints, consumer campaigns or NGO activity related to EHS issues at the company and of such significance that it may affect the company's reputation and brand.

Annual reporting

The CEO will provide the Board with an annual EHS Report. The format and content of this annual report shall be agreed with the Board in advance but at minimum is likely to include:

- Summary information on the implementation of this Policy and any key developments and/or suggested changes for Board consideration
- Summary information on performance of the company's EHS management systems including any major changes enacted by management during the reporting period
- Any strategic EHS-related corporate initiatives or stakeholder partnerships
- Performance against any operational-level EHS objectives and targets
- Resource efficiency information including data on e.g. energy and water consumption and greenhouse gas emissions
- Health and safety statistics including lost time incidents (LTIs) (with incident analysis as appropriate)
- Any EHS issues with significant financial, legal or commercial implications.

2.8 Monitoring and review

This Policy will be enforced through regular monitoring and review and will form part of the Company's procedures.

2.9 Queries

Should you have any questions regarding this Policy or the supporting principles please contact: esg@namirial.com