

SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION POLICY AND MAJOR ACCIDENT PREVENTION

(D.LGS. 105/15 e s.m.i., UNI EN ISO 14001:2015, UNI EN ISO 14001:2026, UNI ISO 45001:2018 e UNI EN ISO 50001:2018)

ERREGIERRE S.p.A. considers the protection of health, the environment, workplace safety, and the prevention of major accidents as an essential objective to be achieved and continuously improved.

To this end, the corporate policy includes the following:

- express its willingness to balance the needs of economic development and value creation with the protection of health, the environment, workplace safety, and the prevention of major accidents;
- clarify the company guidelines for such protection and prevention;
- share with stakeholders (employees, collaborators, contractors, trade unions, institutions, citizens, etc.) the relevant management principles;
- ensure that staff has a thorough understanding of the risks associated with production processes and all environmental impacts that may occur;
- encourage the participation and collaboration of all stakeholders, acknowledging that their active contribution is decisive for achieving objectives related to safety, environmental protection, and major accident prevention.

Safety Management System (SGS-PIR)

To achieve these objectives, the Company has developed a **Safety Management System for the Prevention of Major Accident Risks (SGS-PIR)**, in accordance with Legislative Decree 105/2015 (Annex 3 and Annex B) and the **UNI 10617 – 45001 and 14001 standards**.

Its effective implementation aims to ensure that the objectives set forth in the Policy are achieved, constantly monitored, and renewed with a view to continuous improvement.

The SGS-PIR is continuously updated based on changes to the production cycle and/or organization and encodes scheduled audits to highlight non-compliance regarding major accident risks and the actions for their resolution.

To achieve the objectives, the Policy provides for the allocation of **adequate human and economic resources**, operating through an SGS suitable for the complexity of the organization, as well as resources (plant, organizational, and managerial) to ensure the efficiency of devices and the implementation of measures provided for the prevention and control of major accidents.

General objectives of ERREGIERRE S.p.A.

ERREGIERRE S.p.A. develops, issues, reviews, and implements activities and initiatives to ensure the maintenance of the following objectives regarding worker safety, hygiene and health, the environment, and major accident risks:

- a. activities and working conditions at Erregierre are managed to prevent accidents, injuries, occupational diseases, and environmental damage through the correct design, construction, operation, and maintenance of workplaces and plants;
- b. compliance obligations, including mandatory regulations, voluntary requirements signed by the organization, standards of good practice, and stakeholder needs, are respected;
- c. hazards associated with business activities are identified and the related risks analyzed;
- d. the most appropriate technical and managerial measures are adopted to remove hazards (where possible) or minimize the effects of residual risks within a continuous improvement cycle, following the priority scale indicated by the “hierarchy of controls”;

- e. the necessary procedures are drafted and implemented to keep business activities under control;
- f. abnormal or emergency operating conditions are assessed, and actions are structured to counteract their effects;
- g. based on the risk assessment (DVR), effective participatory information, training, and instruction are provided to workers to increase their awareness and responsibility regarding safety, health, environment, and major accident risks;
- h. procedures are implemented to ensure that all workers of third-party companies operating at production sites adopt behaviors, practices, and procedures compliant with the standards defined by Erregierre and communicated to them;
- i. prevention and control of major accidents are promoted for all business activities with the support of the RLSSA (providing them, where necessary, with adequate tools).

J. The commitment to prevent pollution and continuously improve environmental performance at both sites is maintained. In particular, the Company undertakes to:

- o identify and control significant environmental aspects and comply with environmental compliance obligations;
- o prevent and reduce emissions, discharges, odorous emissions and contamination;
- o improve management and, where possible, reduce waste generation, giving priority to recovery and recycling;
- o use raw materials, water and natural resources efficiently;
- o maintain treatment and abatement facilities in an efficient condition;
- o adequately prevent and manage environmental emergencies;
- o consider, where relevant, the life cycle of products and services and the environmental aspects associated with suppliers and external processes;
- o consider the risks and opportunities associated with climate change;
- o assess, where relevant, the effects of activities on biodiversity and ecosystems;
- o the Company also undertakes to transition to ****UNI EN ISO 14001:2026****, progressively integrating the new applicable requirements into the Environmental Management System.

Responsibilities and corporate commitments

The responsibility for implementing the Policy objectives is delegated to the **Plant Director, the HSE Service, and all Workers**, respecting each role.

Specifically, ERREGIERRE is committed to:

- proper management of natural resources, including energy;
- pollution prevention through emissions control and monitoring;
- adequate management of industrial waste, including reduction;
- prevention of accidents, injuries, and occupational diseases;
- attention to stakeholders, including their needs and expectations;
- continuous improvement processes;
- leadership at all levels of the organization;
- maintenance of the Supervisory Body (ODV);
- compliance with UNI EN ISO 14001:2015 and UNI ISO 45001:2018 standards.

Specific Objectives for the 2026–2027 Period

- Continuation of training, instruction, and information activities on Major Accident Risks (RIR), including ongoing training and drills on the Internal Emergency Plan;

- Maintenance of operational software for the practical management of the Major Accident Risk Management System;
- Implementation of ESG-oriented initiatives according to the sustainability plan;
- Adoption and maintenance of UNI EN ISO 50001 standard;
- Improvement of treatment plant standards, particularly internal biological treatment systems.

Monitoring and communication

Management, assisted by the HSE Service, documents and keeps under control the activities of SGAS through periodic reviews in which all involved actors participate.

This activity is carried out with particular attention to reports from maintenance of critical elements, reporting of anomalies, near-accidents, and accidents, and the use of chemicals subject to Legislative Decree 105/15.

ERREGIERRE S.p.A. is committed to implementing the principles of the Major Accident Prevention Policy and its objectives, providing the necessary structure and resources.

It also carries out periodic monitoring of objective achievement and, if necessary, promotes appropriate corrective or improvement actions.

Dissemination and responsibility

The SGS-PIR Policy also serves as a corporate communication document; to ensure maximum dissemination within the company, this document is:

- posted on all company notice boards;
- delivered to all new hires and distributed to all employees via the Inaz portal;
- made available to operators with a PC workstation in the shared folder
“Documentation Environment and Safety\Documents of the Environment and Safety Management System\Corporate Policy on Environment and Safety”.

In this way, everyone is aware of their obligations regarding major accident prevention.

For all other stakeholders, the document is available on the company website.

It is the responsibility of Function Managers to:

- ensure that this document is understood by their collaborators and, if necessary, provide clarifications;
- adopt appropriate measures to ensure that employees operate correctly in performing their duties.

Review and validity

The Policy is defined by the **Plant Director** and reviewed at least biennially to incorporate the new intentions of Management and/or changes that have occurred. All workers, including permanently operating third parties, must operate in compliance with the Policy and company rules.

San Paolo d'Argon, September 11, 2026

Plant Director

Federico Orsini

