

PPIR - MAJOR ACCIDENT PREVENTION POLICY

For HydroChem Italia S.r.l., protection of workers' health and safety, protection of the population and respect for the environment are fundamental parts of its activities. For this reason, by adopting the principles under Legislative Decree 105/2015, it considers it fundamental to adopt and maintain a Safety Management System for the Prevention of Major Accidents to ensure correct performance of its activities.

The policy includes the general objectives and principles of intervention that have been outlined and approved by the Manager.

1. GENERAL PRINCIPLES

The Company intends to operate with respect for the safety of its employees and people living near the plant, preventing major accidents and mitigating any harmful effects.

Its general principles are aimed at:

- preventing and controlling major accidents that could cause damage to people, the environment and installations;
- ensuring compliance with legal provisions relating to the prevention of major accident risks and fire risks;
- promoting and seeking the application of technologies for risk containment and/or reduction to acceptable levels which are compatible with the maintenance needs of the service for which the systems are used, the technical characteristics of the plants, the rate of use and the residual life of these facilities, as well as the costs associated with the application of these technologies;
- ensuring that the modification of existing systems and/or the introduction of new systems, new techniques and new substances are subject to specific planning that takes into account the safety objectives for preventing major accident risks and fire risks;
- ensuring that changes in organisation and management take safety objectives into account to prevent major accident risks;
- involving the entire system's organisation in Safety Management for the Prevention of Major Accidents within the scope of its competences and attributions.

2. OBJECTIVES FOR THE PREVENTION OF MAJOR ACCIDENT RISKS

In order to promote the principles described in the previous section, and to maintain and seek continuous improvement, the Company undertakes to:

- a) Increase awareness of the Major Accident Prevention Policy Document among company employees.
- b) Monitor the roles, responsibilities and tasks of the key functions in the field of Safety, to ensure an efficient Safety Management System for the Pieve Vergonte site.
- c) Provide and monitor information, education and training plans, keeping them updated and in line with the provisions of current legislation, for the employees and staff of long-term

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contractors working within the plant directly and also by verifying the effectiveness of the information, education and training performed by contractors.

- d) Keep the safety analyses relating to the identification of possible accidents up to date and review the Safety Report.
- e) Continue to formalise procedures for conducting periodic checks on critical equipment and review the respective management procedures.
- f) Keep up-to-date documentation for the purposes of the SGS.
- g) Promote integration between SGS procedures and company management systems.
- h) Monitor and, where appropriate, improve change management, preliminary hazard analysis and risk analysis to increase and improve implementation.
- i) Review and update the Internal Emergency Plan and those of the Department, based on the results of the update of the safety analyses and organisational changes.
- j) Monitor the application of operational experience analysis.
- k) Improve the effectiveness of internal audits and inspections.
- l) Keep the performance indicators up to date to improve their suitability for assessing the achievement of the objectives set out in the policy document.
- m) Improve critical material procurement management.
- n) Promote continuous improvement, based also on the results of internal and external audits and operational experience.

3. STRUCTURE OF THE SAFETY MANAGEMENT SYSTEM

The Pieve Vergonte plant Safety Management System is divided into:

- SGS-PIR Policy
- Policy Document
- Management System Manual
- Procedures
- System logs
- Management Review

Pieve Vergonte, 22/04/2021

HydroChem Italia S.r.l.
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