

COMPANY POLICY DOCUMENT

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The company Eurosyn S.p.A. is a UNI EN ISO 9001:2015 certified company engaged in the distribution of specialty chemicals for industry throughout the national territory, managing storage, packaging, sales and logistics activities.

Some of the products distributed fall within the scope of Legislative Decree 105/15 and the presence of hazardous substances above the specific threshold limits set out in Annex 1 of the aforementioned Decree has led to the classification of the Plant as a "Attività a Rischio di Incidente Rilevante di Soglia Inferiore".

PURPOSE

This Document defines the Policy adopted to ensure the Quality of the services provided, customer and stakeholder satisfaction, the protection of Occupational Health and Safety, the prevention of Major Accidents, and the protection of the Environment. It also sets out the general guidelines and objectives that the Organization intends to pursue within the framework of its corporate strategy.

REQUIREMENTS

Il presente Documento è redatto in conformità ai requisiti delle seguenti norme e disposizioni:

- UNI EN ISO 9001:2015
- UNI EN ISO 14001:2015
- UNI EN ISO 45001:2023
- UNI 10616:2022
- UNI 16017:2019
- Art. 14 and Annex B of Legislative Decree 105/15
- Art. 30 of Legislative Decree 81/08

The Document specifically describes:

- the general principles on which the Integrated Policy for Quality, Occupational Health and Safety, Major Accident Prevention and Environmental Protection is based;
- the Management's commitment to comply with applicable regulatory, contractual and mandatory requirements;
- customer focus and the satisfaction of stakeholders;
- the general objectives and the commitment to the continuous improvement of the Management System;
- the integration of Quality within the Safety and Environmental management systems.

GENERAL PRINCIPLES

Eurosyn S.p.A. is committed to ensuring a sustainable balance between the Company's economic objectives and the requirements arising from the Quality of the services provided, customer satisfaction, the protection of Workers' Occupational Health and Safety, the prevention of Major Accidents and the protection of the Environment, operating in compliance with applicable legislation and with the principles of integrity, fairness and social responsibility defined in the Company's Code of Ethics.

Eurosyn S.p.A. acknowledges that its activities may generate impacts on service quality, on the Occupational Health and Safety of its employees and of those operating under the control of the

organization, and on the Environment. The Company therefore considers the management of risks and opportunities associated with its processes as an essential element of responsible and effective corporate management.

In this regard, the Company:

- participates in the Responsible Care programme;
- supports cultural and social initiatives and associations (e.g. FAI);
- ensures the quality and traceability of the supply chain, including the distribution of sustainable palm oil (RSPO);
- supports social promotion initiatives at both local and national level.

The adoption of a Management System for Quality, Occupational Health and Safety and the Environment is considered a fundamental tool to ensure compliance with applicable requirements, the continuous improvement of company performance and the strengthening of the trust of customers, workers and stakeholders.

GENERAL OBJECTIVES

Within its corporate prevention strategy, Eurosyn S.p.A. undertakes to:

- ensure compliance with legal requirements, fulfilling all current and future provisions of national, regional and local legislation regarding Occupational Health and Safety and the prevention of Major Accident risks;
- ensure the quality of the products and services provided, improving customer satisfaction;
- protect the Occupational Health and Safety of workers and third parties operating under the control of the Organization;
- prevent Major Accidents and reduce the risks associated with the activities carried out;
- protect the Environment and prevent pollution, paying particular attention to relations with the local community (Institutions, Authorities and Citizens);
- promote the involvement, consultation and awareness of personnel at all levels through the full sharing of the Company Policy and corporate objectives;
- develop personnel skills through appropriate education, information and training activities;
- manage company processes according to a process-based approach and continuous improvement principles;
- monitor the performance of the Management System through indicators, audits and management reviews;
- ensure the availability of the resources necessary to achieve the established objectives;
- communicate appropriate information regarding the risks associated with activities to suppliers and contractors, in accordance with the principles of integrity, fairness and responsibility defined in this Policy and in the adopted Code of Ethics, in order to ensure their involvement in their implementation;

- periodically identify hazards related to company activities, analysing the associated risks and assessing the consequences that could affect the Quality of the services provided, with the aim of minimising the potential impact on workers' Health and Safety and the risks of Major Accidents;
- design and implement facilities compliant not only with legislative requirements but also with the most up-to-date Good Engineering Practices, with particular reference to workers' Health and Safety and Environmental Protection;
- plan and implement programmes for the improvement of workers' Health and Safety and for the reduction of Major Accident risks, disseminating them within the company and verifying and updating them in accordance with technological developments and accumulated experience;
- plan and implement measures to address emergency situations;
- involve and consult workers through the Workers' Safety Representative (RLS) in order to share improvement objectives.

The general objectives are translated into specific actions within the Improvement Plan, defined on the basis of:

- results of periodic audits and inspections carried out both internally and by external bodies;
- assessments arising during the Annual Management System Review;
- analysis of anomalies, near misses, injuries or incidents that have occurred;
- suggestions from workers emerging during the periodic meeting or communicated directly or through the Workers' Safety Representative (RLS);
- results of the Analysis and Assessment of Major Accident Risks (AVR) pursuant to Legislative Decree 105/15;
- results and analyses of the Risk Assessment Document (DVR) for workers pursuant to Legislative Decree 81/08;
- regulatory and technical developments.

The Improvement Plan is issued annually by the Manager, following consultation with the Workers' Safety Representative (RLS), and is made available to employees through sharing on the company server.

MANAGEMENT SYSTEM

Eurosyn S.p.A. has adopted a Management System certified according to the UNI EN ISO 9001:2015 standard and developed in accordance with the principles of UNI EN ISO 45001:2023 and UNI EN ISO 14001:2015, as well as in compliance with the requirements of Art. 14 and Annex B of Legislative Decree 105/15 and Art. 30 of Legislative Decree 81/08.

MANAGEMENT COMMITMENT

In order to achieve the objectives set forth in its Policy, Management undertakes to:

- define and periodically review objectives for Quality, Occupational Health and Safety, and the Environment;
- promote the continuous improvement of Management System processes;
- ensure customer focus and the effective management of reports and complaints;

- select and monitor suppliers and contractors based on quality, safety and legal requirements;
- guarantee traceability of activities and relevant decisions;
- cooperate with competent Authorities and stakeholders;
- conduct its activities in a manner that ensures full compliance with regulations for the protection of workers and the Environment;
- organize company human resources in terms of individual competence, decision-making autonomy, and related responsibilities;
- inform, train, and instruct all employees so that they can operate with full awareness of potential risks associated with their activities;
- documentedly verify the effectiveness of information and training actions through tests, questionnaires, or review of operational experience;
- maintain facilities in an efficient state, including through periodic inspections and controls;
- design modifications or new facilities to ensure compatibility with Safety, Health and Environmental protection;
- identify and apply Safety requirements in the selection of suppliers and contractors;
- implement appropriate measures to ensure that third-party personnel operating within the warehouse follow behaviours, practices, and procedures consistent with this Policy;
- cooperate with public Authorities in managing emergency procedures.

MANAGEMENT SYSTEM STRUCTURE

The Management System is structured to plan the actions necessary for the proper management of Quality and Safety throughout the various phases of the Plant's activities. It is a dynamic system based on the sequence: "planning, implementation, verification, review." Within this framework, it is periodically examined and evaluated in order to achieve continuous improvements in the management of the Plant's activities.

The Management System is formalized through procedures that describe specific criteria and operational instructions providing practical guidance. System documents are listed in File *1a-PO Elenco documenti e registrazioni*, maintained and updated by the Management System Manager (RSG).

Applicable regulatory and legislative references are specified in each individual procedure.

All documentation related in any way to the implemented management systems is subject to periodic backup.

IMPLEMENTATION OF THE MANAGEMENT SYSTEM

The implementation of the Management System is carried out through:

- the drafting and issuance of procedures and other system documents;
- informing and training personnel;
- the application of procedures and other system documents;
- verifying the effectiveness of implementation methods, including the collection of observations;
- modifying or refining documentation as necessary;
- the collection and management of anomalies (Reports, Non-Conformities, Near Misses, injuries, Major Accidents);
- the periodic review of the system.

Upon completion of drafting, after checks for consistency and applicability with the relevant or involved company functions, the procedure is issued and officially published on the company server, following approval by the Management System Manager / Company Director (GES/DL).

At any stage of procedure application, observations or proposals for improvement may be incorporated. Simultaneously with the entry into force of the procedure, the Health and Safety Officer (RSPP), Deputy Health and Safety Officer (ASPP), or Management System Manager (RSG) will provide training to the Function Managers, who will then instruct the involved workers.

POLICY COMMUNICATION

The general objectives of the Manager/Employer, summarized in this Document, are communicated to employees through distribution of the Document and are the subject of training and information sessions. A copy of the Policy is posted on the notice board at the Capralba office and is available on the company website.

REVIEW AND REVISION

The present Document is subject to verification and, if necessary, revision at least every two years. Any revision is carried out by the Manager/Employer following consultation with the Workers' Safety Representative (RLS).

The verification and updating of the Management System Procedures are carried out by the Management System Manager (RSG).

The updating of the Improvement Plan, carried out by the Manager/Employer, does not constitute a reason for revising this Document.

LIST OF REFERENCES

- UNI EN ISO 9001:2015 Quality Management Systems – Requirements
- UNI EN ISO 14001:2015 Environmental Management Systems – Requirements and Guidance for Use
- UNI EN ISO 45001:2023 Occupational Health and Safety Management Systems – Requirements and Guidance for Use
- UNI 10616:2022 Establishments with Major Accident Hazards – Safety Management Systems – Guidelines for the Application of UNI 10617
- UNI 10617:2019 Establishments with Major Accident Hazards – Safety Management Systems – Essential Requirements
- Piano di miglioramento
- 1a-PO Elenco documenti e registrazioni

Capralba, 09/03/2026

Management System Manager / Company Director
Enrico Maria Campana

