



POLICY ON QUALITY, HEALTH, ENVIRONMENT, ENERGY, SAFETY AT WORK AND MAJOR ACCIDENT PREVENTION

COGNE ACCIAI SPECIALI SPA, manufacturer of stainless steels, valve steels, tool steels, high alloy steels and construction steels with high quality characteristics, undertakes to manufacture and regularly supply to its Customers materials compliant with the agreed specifications working in full compliance with the regulations concerning health and safety protection at work, major accident prevention, environmental protection and the efficiency of energy performance.

COGNE ACCIAI SPECIALI SPA considers the health and safety of all its workers and of the neighbouring population, the environmental protection, the sustainable energy management and the satisfaction of its customers an absolute priority that is integrated in all its activities.

COGNE ACCIAI SPECIALI SPA undertakes to:

- comply with applicable legal requirements, including (Italian) Legislative Decree D.Lgs. 81/08 and subsequent amendments and additions and D.Lgs. 105/15 and subsequent amendments and additions, and with all the quality, health, safety and environment requirements to which it adheres (UNI EN ISO 9001:2015, IATF 16949:2016, AS/EN 9100:2016, UNI ISO 45001:2018, UNI EN ISO 50001:2018, UNI EN ISO 14001:2015, UNI EN ISO/IEC 17025:2018 and ASME NCA-3800-4200/WA 3800);
- continue activities for implementation and integration of management systems (quality, health, environment, energy, major accident and fire prevention), systematically applying the risk-based approach to prevent unwanted situations or events.

Accidents, including major ones and accidents of environmental importance, fires, occupational accidents and diseases can and must be prevented.

COGNE ACCIAI SPECIALI SPA regularly reinforces and consolidates the knowledge and competences of its personnel through constant training and improvement of professional and managerial abilities and adherence to the ethical principles of its ethical code. Involvement and training of employees are essential. Specific courses about safety, energy optimization and environment, and information sessions are organised for all employees with the involvement of contractors' personnel.

The objectives of the Quality, Health, Safety, Energy and Environment policy regard:

- continual health, safety, energy and environmental improvement through the monitoring of specific defined indicators to measure its development and to increase its performances;
- continual improvement in the ability of analysis, prevention of and reaction to accidents according to (Italian) Legislative Decree D.Lgs. 81/2008, UNI ISO 45001:2018, to major accidents according to D.Lgs. 105/15 and to environmental reports according to UNI EN ISO 14001:2015, and the maintenance and updating of suitable management systems;
- continual improvement of the health and safety of operators and environmental performance through investments dedicated to projects aimed to implement healthier, safer and more environmentally sustainable production processes;
- full compliance with the requirements undersigned and issued by COGNE ACCIAI SPECIALI SPA, including the internal procedure system, in addition to compliance with the current regulatory machinery;
- continual check of the Emergency Internal Plan and constant training of the members of the Internal Team in charge of emergencies by means of proper training according to Legislative Decree 81/08 and to Legislative Decree 105/15;
- the comprehension, awareness and competence of those working inside the Company's factories, whether or not they are employees;
- continual improvement in the quality of service to the customer and constant search for innovative solutions, which will enable quality levels to be improved at competitive costs;
- the reduction of energy consumption through the design, modification or construction and management of the buildings, production lines and service systems of the site, implementing the best technologies available on the market, with the aim of continuously improving energy performance;
- the identification and continuous updating of significant energy performance indicators with the aim of analyzing their trends;
- the introduction of appropriate control and audit methodologies on the Energy Management System in line with the UNI EN ISO 50001: 2018 regulatory framework to which Cogne Acciai Speciali S.p.A. has decided to comply.

The achievement of the aforementioned goals occurs also through the involvement of the local workers and their delegates.

The Policy on Quality, Health, Environment, Energy, Safety at work and major accident prevention is applied through:

- identification and compliance with applicable mandatory requirements;
- involvement of the supply chain, constantly monitored and supported in their development;
- a constant analysis of the company context, internal and external factors and the interested parties that may impact on the regularity of the company's activity;
- periodic analysis of the activities actually carried out in order to identify all the potential risks (risk-based approach) and implement suitable technical, organisational and procedural protection measures;
- constant attention to technological evolution and to the evolution of the organisation, with the objective of ensuring healthy and safe workplaces, adequate protective devices, efficient energy transformation processes necessary for the performance of production activities as well as to successfully reduce environmental impacts;
- continual education and training of employees to increase their knowledge, awareness and competences about the quality of system and product and the evaluation of generic and specific risks, including prevention and protection measures adopted for safety;
- involvement and support to the managerial and not staff so that it contributes to the effectiveness of the whole organization and the various management systems applicable;
- effective intervention action of the emergency team for response to emergencies, also environmental, and firefighting;
- effective allocation of necessary resources for the planning and tangible implementation of programmes for achieving defined objectives;
- expansion and updating of factory control and safety systems implemented for the purposes of fire prevention and major accident prevention;
- periodic review by the company's top management of the adequacy and effectiveness of the company's quality, health, safety, energy and environment management system, also according to D.Lgs. 105/15.

The principles, methods and tools identified in this policy are subjected to a periodic review in order to ensure their effectiveness and adequacy.

Aosta, 2 January 2023

Manager pursuant to D.Lgs.105/15

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General Manager

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