

COMPANY POLICY (Quality, Environment, Safety)

rev. 02 dated 15/02/2021

The Management of the Lucefin Group promotes the commitment of all its Companies to respect the principles expressed in its Company Policy.

The integration of the documentation of the Management Systems (Quality, Environment, Safety) and the other company organisational models, regulates the processes carried out inside the company, in a planned and documented manner, aimed at achieving the following objectives:

Regulatory compliance.

Compliance with the laws and regulations in force in the countries in which the Group operates. In particular via the systematic monitoring of the obligations to be respected and the timely adoption of legislative changes and other requirements that the organization accepts.

Professionalism and reliability.

Ability to strengthen its image and reputation on the market, enhancing the centrality of the person (of the employee) and the company's commitment to the creation of its professional value. Pursuing customer satisfaction by regularly supplying products in compliance with implicit and explicit contractual requirements through:

- ✓ The review of all contractual requirements;
- ✓ optimal production planning and systematic preventive maintenance of production lines and other equipment and the versatility of both machinery and operators;
- ✓ the systematic inspection of materials/services supplied during the various stages of production
- ✓ the promotion, within the company, of everyone's awareness regarding their role and responsibility in order to achieve Customer satisfaction and the established Quality Objectives.

Flexibility, innovation and transparency.

Prompt response to market needs, defined as the ability to meet the needs of an increasingly changing market and to support customers (and other stakeholders) in order to find appropriate and functional solutions to new demands, including through:

- ✓ the technological innovation of production lines, aimed at identifying sustainable and more efficient solutions, also in connection with the prevention of environmental impacts and of the operators' health and safety.
- ✓ the achievement/maintenance of a professionalism always adequate to the technological and regulatory evolution of the reference markets.

Environmental protection.

The avoidance of environmental impacts through monitoring and action on specific aspects.

- ✓ Monitor environmental impacts in order to reduce pollution in all operations, including the entire product life cycle.
- ✓ Pursue business efficiency in order to contain and eliminate environmental impacts related to business activities.
- ✓ Improve waste management (i.e. diversification, decrease, privileging recycling as opposed to disposal);
- ✓ Increase awareness and environmental awareness of all company personnel and their suppliers through constant training, information and communication activities;
- ✓ Maintain and promote an open dialogue with all interested parties (local communities, supervisory bodies, staff, etc.).

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Società assoggettata a direzione e coordinamento da parte di BBH 1 snc di Buzzi Giorgio&C.



Protection of health and safety in the workplace.

Promotion of prevention and protection measures to protect workers. In particular with a focus on:

- ✓ Considering Health and Safety aspects as essential when defining new activities or revising existing ones;
- ✓ Taking the necessary steps to prevent accidents and occupational diseases in the workplace;
- ✓ Involving and consulting staff on issues relating to Health and Safety in the workplace, including through the Workers' Safety Representatives;
- ✓ Promoting activities to disseminate the culture of prevention and protection, so that all workers are aware of and prepared to perform their duties in safety;
- ✓ Maintaining a transparent relationship and collaboration with the public authorities and/or relevant control bodies.
- ✓ Scheduling periodic inspections to assess the performance and effectiveness of improvement programmes relating to Health and Safety in the workplace.

The Lucefin Group establishes actions necessary to pursue Continuous Improvement in alignment with the planned sustainable objectives through systematic activities of analysis and evaluation. In particular the themes investigated concern:

- ✓ Process risks and opportunities.
- ✓ Risks of criminal activities.
- ✓ Environmental performances: monitoring of the trend.
- ✓ Workplace Health and Safety performance.
- ✓ Stakeholders' needs.

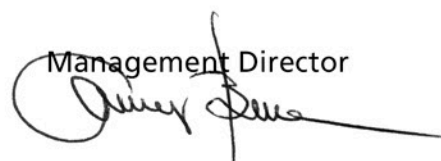
During the Management Review, and in other planned activities of comparison, the Management:

- ✓ Checks the adequacy and effectiveness of the Company Policy through the degree of application of the systems.
- ✓ Examines the evolution of the objectives defined in the company's project plans, in terms of results and resources.
- ✓ Considers changes in the organisational context, both internal and external, and the needs of Stakeholders.
- ✓ Assesses the adherence of indicators that measure the performance of corporate processes.

In the performance of their work duties, each employee shall promote the dissemination of and compliance with the above principles.

The Management ensures that all Process Managers are provided with the necessary resources to achieve this Policy.

This Policy is circulated to all the Interested parties, by publishing relevant details on the company website (www.Lucefin.com).

Management Director


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