

INTEGRATED MANAGEMENT SYSTEM

QUALITY - SAFETY

ATTACHMENT 1

MAJOR ACCIDENT PREVENTION POLICY

The Board of Directors of Promox SpA, as far as it is responsible and in relation to the subjectability criteria pursuant to Legislative Decree 105/15, undertakes to pursue safety in every decision-making process, in the production cycles, in the operational phase of the processes , including handling, handling and storage of hazardous substances.

The strategic objective of this commitment is to protect the health of workers, safeguard the environment, prevent the risks of major accidents and contain their potential effects.

In this context, the Company undertakes to maintain, apply and implement a Management System for the prevention of major accidents in the Promox plant in Leggiuno; after evaluating the production and management cycles, this structured system corresponds to the law and safety criteria of the processes, with reference to the following fundamental concepts:

- consider risk prevention as a strategic element in company programs;
- scrupulously comply, in substance and in principles, with the applicable laws and regulations relating to the prevention of major accidents;
- ensure the protection of man and the environment with the adoption of appropriate organisational, technical and management systems which also allow the achievement of quality and profitability objectives.

The Company therefore undertakes to:

- Reduce the risk of accidents, near misses and injuries recorded in accordance with the procedures.
- Keep specific safety studies updated (e.g. HAZOP, What-it) for the most critical processes (synthesis processes), aimed at reducing the level of risk,
- Improve the training of the human element of the company structure and of third parties who, even occasionally, operate within the company, verifying the results of the operations carried out, in compliance with the obligations established by Legislative Decree 81/08.
- Increase the involvement of all personnel, using the tool of training and change management in a timely and effective manner, also in the context of organizational changes.

This policy is communicated to all employees and made known, in the appropriate forms, to the external companies operating in the Promox factories in Leggiuno.

It is available to the public and to anyone who requests it.

Promox SpA The Chairman of the Board

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Leggiuno, 15 May 2021

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