

MAJOR ACCIDENT PREVENTION POLICY

INDEX:

- 1 REFERENCES
- 2 PREMISE
- 3 PURPOSE
- 4 RESPONSIBILITY'
- 5 OPERATING MODES
- 6 STORAGE

- ATTACHMENT 1 MAJOR ACCIDENT PREVENTION POLICY
- ANNEX 2 DESCRIPTION OF THE SAFETY MANAGEMENT SYSTEM
- ANNEX 3 MAJOR ACCIDENT PREVENTION POLICY DOCUMENT
- ANNEX 4 IMPLEMENTATION PROGRAM AND IMPROVEMENT PLAN

11	05/15/2021	Biennial update		
10	05/15/2019	Update following SGS commission prescriptions/recommendations		
9	12/15/2018	Biennial update		
8	12/15/2016	Biennial update		
7	12/15/2014	Biennial update		
6	12/12/2012	Biennial update		
5	12/19/2010	Biennial update		
4	12/19/2008	Biennial update		
3	12/20/2006	Biennial update		
2	12/20/2004	Replacement of AU with CdA		
1	12/20/2002	Small formal changes		
0	04/04/2000	1st Issue		
REV. No.	DATE	REASON FOR REVISION	ISSUED BY TO SAY	APPROVED BY PRESIDENT

Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	1Of13

MAJOR ACCIDENT PREVENTION POLICY

1. REFERENCES

Legislative Decree No. 105 of 26 June 2015 "Regulations concerning the risks of major accidents" Implementation of EC Directive 96/82 (SEVESO II); Annex III: Plant Management and Organization System for the purpose of preventing major accidents, and Annex B (art. 14) Guidelines for the implementation of the Safety Management System for the prevention of major accidents.

A copy of the relevant legislation is attached below

Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	2Of13

MAJOR ACCIDENT PREVENTION POLICY

2. PREMISE

The company has been active since 1985 for the production of organic peroxides for the polymerization of resins and for disinfection. It has two production facilities in the territory of Leggiuno (VA) identifiable at street numbers 21 and 22a, where substances classified as dangerous are stored and processed pursuant to Legislative Decree No. 105/2015 of 26 June 2015.

Part of the settlement at number 21 also lies within the Municipality of Sangiano and borders the Municipality of Monvalle.

The company's activity is configured as a "lower threshold establishment" and, therefore, is subject to the obligations of art. 13 of Legislative Decree 105/2015.

The Manager has drawn up the "Notification and information form on the risks of major accidents for citizens and workers" required by the aforementioned art. 13 of Legislative Decree 105/2015, according to the contents indicated in Annex 5.

This Form, which includes the activities present in the two settlements, was sent to the competent authorities on 28 April 2016.

3. PURPOSE

The purpose of this procedure is to define the responsibilities and operating methods of the functions which, within the company, have the task of establishing and disseminating the major accident prevention policy.

4. RESPONSIBILITY'

Manager

The BoD has appointed the Chairman of the Board of Directors as "System Manager" and "Employer", respectively pursuant to Legislative Decrees 105/15 and 81/2008

The President guarantees the necessary conditions for the implementation of the Safety Management System (SGS), active in the production facilities of Promox SpA in Leggiuno; this in accordance with the relevant accident risk prevention policy document.

The Board of Directors, in the person of the chairman, adopts the Major Accident Prevention Policy.

Chief Executive Officer (AD)

AD implements the major accident prevention policy within its sector of competence.

Adopts and ensures the full implementation of SGS for the prevention of major accidents through the control of the application of management procedures and operating instructions.

In the absence of the RLS, he illustrates the structure and concepts of SGS to his collaborators; verifies their knowledge and practical application.

Plant Management (DIRE)

The DIRE function, independently of other responsibilities, also performs the role of representative of the Management for the Management of the Quality System and for the Safety Management System (SGS). For this role he also makes use of the collaboration of the other functions of the organization (ASQL, AMMI, etc).

Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	3Of13

MAJOR ACCIDENT PREVENTION POLICY

Prevention and Protection Service Manager (RSPP)

Prepares and proposes to the Board of Directors of Promox SpA the Policy Document for the Prevention of Major Accidents, complete with the related procedures and the SGS implementation programme, in accordance with current legislation.

Workers' safety representative

Despite repeated requests, no employee declared himself available to hold this position and therefore it was not possible to proceed with the election.

The Policy Document will therefore be made known to all collaborators by AD.

5. OPERATING MODES

Major accident prevention policy document of the Promox plants in Leggiuno:

Promox SpA adopts its own Policy for the Prevention of Major Accidents (Annex 1), taking into account the national and regional legislation applicable to the production reality.

In line with this Policy, the Company may undertake any further voluntary commitments in the field of quality, environment and safety.

The major accident prevention policy document (Annex 3) complies with the legal requirements defined in Legislative Decree 105/15 (art. 14) and in Annex B to the decree itself.

This Document was adopted by the BoD by the Director of the Promox plant in Leggiuno.

It will be reviewed by RSPP on the occasion of each modification pursuant to art. 18 of Legislative Decree 105/2015 and in any case at least every two years. During the review, the results achieved and those of the planned audits will be evaluated.

Dissemination of the Major Accident Prevention Policy:

The Major Accident Prevention Policy will be disseminated with appropriate means of communication to:

- all employees, without distinction
- all external subjects who operate within the Establishment

The Major Accident Prevention Policy is also available to the Authorities, the public and anyone who requests it.

The "Safety and quality objectives plan" is reviewed annually and is an integral part of this document

6. STORAGE

The maintenance of the major accident prevention policy is the responsibility of the Administration (AMMI) in compliance with the related management procedure.

Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	4Of13

MAJOR ACCIDENT PREVENTION POLICY

ANNEXES TO THE PROCEDURE:


Annex 1 "Major Accident Prevention Policy"

Annex 2 "Description of the Safety Management System"

Annex 3 "Major Accident Prevention Policy Document"

Annex 4 "Implementation Program 1 - Improvement Plan"

Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	5Of13

	INTEGRATED MANAGEMENT SYSTEM QUALITY - SAFETY
	ATTACHMENT 1
<u>MAJOR ACCIDENT PREVENTION POLICY</u>	

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.

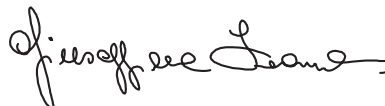
The Company therefore undertakes to:

- 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



Leggiuno, 15 May 2021

Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	6Of13

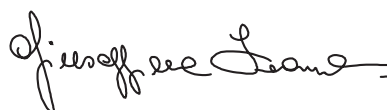
DESCRIPTION OF THE SAFETY MANAGEMENT SYSTEM

At present, a Safety Management System (SGS) is active, in implementation of the requirements of art. 14 of Legislative Decree No. 105/2015, the contents of which listed below are developed in detail in the SMS Manual.

SAFETY MANAGEMENT SYSTEM (ref to the paragraphs of the SMS Manual)	
7	Organization and staff
	Definition of resource responsibilities and activity planning
	Education, information and training activities
	Human factors plant operator interfaces
8	Identification and assessment of relevant hazards
	Identification of the dangerousness of substances and processes, and definition of safety criteria and requirements
	Identification of possible incidental events and safety analysis
	Planning of plant and management adjustments for risk reduction and updating
9	Operational Control
	Identification of plants and equipment subject to verification plans
	Documentation management
	Operating procedures and instructions in normal, abnormal and emergency conditions
	Maintenance procedures
	Procurement of goods and services
10	Change management
	Technical-plant engineering, procedural and organizational modifications
	Documentation update
11	Emergency planning
	Internal Emergency Plan
12	Performance check
	Performance evaluation
	Analysis of accidents and near misses
13	Check and review
	Inspection checks
	Review of the security policy and SMS


The BoD of Promox SpA therefore undertakes to keep the System active and to implement it for the continuous improvement of its performance.

Promox SpA
the Chairman of the Board



Leggiuno, 15 May 2021

Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	7Of13

	INTEGRATED MANAGEMENT SYSTEM QUALITY - SAFETY
REVISION No. 11	ANNEX 3
<u>AGE PREVENTION POLICY DOCUMENT</u> <u>MAJOR INCIDENTS</u>	

In order to pursue the general objectives of the major accident risk prevention policy, the Board of Directors of Promox SpA undertakes to develop and implement the following conditions for the adoption and implementation of the Safety Management System for the prevention of risks of major accidents, in compliance with the Company's common policy, according to the attached program (Annex 4).

□ **Organization and staff**

- ensure the responsibility of management at all levels in the policy, in the general objectives of prevention of major accidents and in the implementation program of the interventions envisaged by the Safety Management System;
- allocate the resources necessary to pursue the objectives of improving the overall risk profile, defined in the planning phase;
- promote staff awareness and involvement through appropriate communication and training programmes;
- ensure that personnel are adequately trained to prevent anomalous behavior capable of causing major accidents;
- promote the adoption of correct safety-oriented behavior by workers, suppliers and external companies working on the site.

□ **Identification and assessment of relevant hazards**

- prior to the adoption of new processes, technologies, activities and services, evaluate the significant intrinsic or induced dangers in order to ensure control and minimize their effects;
- adopt the most appropriate techniques among those available in the field of risk analysis in the design phase of production and organizational processes, to identify and analyze the relevant hazards;
- create systems and processes that allow for the elimination or reduction of relevant hazards, making informed and documented choices, through a cost-benefit analysis decision-making process.


□ **Operational control**

- draw up and update procedures and work instructions for the correct conduct of the activities carried out;
- implement appropriate methods of verification, control and audit of safety management in the management of plants and processes and in the application of work procedures and instructions;
- involve and motivate all personnel for the inspection and control of the plants, within the scope of their responsibilities and mutual interactions.

□ **Change management**

- develop suitable criteria and procedures for identifying the level of criticality of the changes and for analyzing the corresponding implications on safety;
- make all personnel responsible not to make changes to systems or components, even small ones, unless previously authorized and adequately documented;

Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	8Of13

	INTEGRATED MANAGEMENT SYSTEM QUALITY - SAFETY
REVISION No. 11	ANNEX 3
<u>AGE PREVENTION POLICY DOCUMENT</u> <u>MAJOR INCIDENTS</u>	

- involve the personnel responsible for adequate updating, control and traceability of the documentation concerning the state of the plant.

□ **Emergency planning**

- make the application of the Internal Emergency Plan effective through training, training and simulations and exercises of the relevant accident scenarios;
- pursue collaboration with the local authorities and coordination with the relevant institutions, evaluating the requests and needs of the community on the issues of accident prevention and control.

□ **Performance checks**

- define the objectives of the Safety Management System and pursue consistent corrective actions to achieve them, as regards the risks of major accidents;
- define and analyze near misses as a tool to increase knowledge, correct any deficiencies in the safety system and pursue continuous improvement of safety conditions;
- inform, educate and train personnel to increase their knowledge and awareness of the risks in order to avoid errors that can be the initiating causes of accidents and adopt suitable actions and behaviors to minimize their effects.

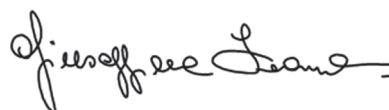
□ **Checks and verifications**

- implement appropriate and rigorous methods of verification and control of critical plant components;
- plan and schedule audits and inspections of the Safety Management System and evaluate the results;
- disseminate the results among the stakeholders and workers;
- sensitize the staff to fulfill the actions and behaviors described in the procedures and work instructions.

This document must integrate the personnel information and training activities and be distributed to all the responsible figures of the Promox SpA plant in Leggiuno and be brought to the attention, in the appropriate forms, of the interested suppliers and external companies operating on the site. It is available to anyone who requests it.

Promox SpA
The Chairman of the Board

Leggiuno, 15 May 2021



Original signed document in archive		REVISION No. 11
Unsigned copy as printed by computer system	Page	9Of13

IMPLEMENTATION SCHEDULE E
IMPROVEMENT PLAN

The Safety Management System improvement program is defined on an annual basis during the review of the SMS itself. It contains: any interventions envisaged in the DVR (Legislative Decree: 81/08 and subsequent amendments) and by the analysis of the risks of a major accident (Legislative Decree 105/15 and subsequent amendments), the interventions approved during the review and/or deriving from plant, procedural, organizational changes and from the various audits and inspections to which the company is subjected.
The Document illustrating the program is an integral part of the SMS and can be consulted in the archive.

No	Objective	Scope	manager	Work start date	Presumed completion date	Indicator	Opening document	Intermediate docs	Closing document	Date	Monitoring	Result
01	Implementation/improvement of the external lighting of the buildings via Diaz 22A	Improved safety during handling operations and surveillance of external areas	TO SAY	06/2019	09/2019	Number of accidents and near misses	---	---	---	16/12/2020		100%
02	Upgrading of the packaging area in via Diaz 22A	Reduction and containment of the risk of release of dangerous substances	TO SAY	06/2017	12/2020	Number of containment leaks due to critical component failures	---	---	---	12/27/2022		80%
03	Updating of the management system for the peracid production plant in via Diaz 22A with automation	Reduction of the possibility of errors in the loading and processing phases	TO SAY	12/2017	12/2020	Number of accidents and near misses	---	---	---	12/27/2022		90%
04	Replacement of the osmotic water production plant in via Diaz 22 A	Improvement of the degree of purity and stability of the PF and greater efficiency of the system	TO SAY	03/2019	06/2019	Number of accidents and near misses	---	---	---	06/10/2020		100%
05	Compressor replacement at via Diaz 21	Greater guarantee of pneumatically controlled safety and fire-fighting systems	TO SAY	03/2019	06/2019	Number of containment leaks due to critical component failures	---	---	---	06/10/2020		100%
06	IBC filling plant for acids in via Diaz 22A	Improvement of the degree of safety and efficiency	TO SAY	05/2019	06/2019	Number of containment leaks due to critical component failures	---	---	---	06/10/2020		100%
07	Drum filling system in via Diaz 22A (flexible pipes)	Better guarantee of resistance and safety	TO SAY	06/2019	06/2019	Number of containment leaks due to critical	---	---	---	06/10/2020		100%

IMPLEMENTATION SCHEDULE E
IMPROVEMENT PLAN

No	Objective	Scope	manager	Work start date	Presumed completion date	Indicator	Opening document	Intermediate docs	Closing document	Date	Monitoring Result
08	Insertion of radar-type level gauges at via Diaz 21 on the storage tanks	Reduction of the risk of error in level measurement and possibility of remote control of the signal and continuous control	TO SAY	09/2019	12/2019	component failures Number of containment leaks due to critical component failures	---	---	---	16/12/2020	100%
09	Replacement of the compressed air production plant in via Diaz 22A	Greater guarantee of pneumatically controlled safety and fire-fighting systems	TO SAY	07/2019	09/2019	Number of containment leaks due to critical component failures	---	---	---	06/10/2020	100%
10	Training of all department operators in relation to fire prevention with achievement of technical suitability	Improved training of workers to conduct emergency response	TO SAY	03/2019	09/2019	Operators Trained as scheduled	---	---	---	06/10/2020	100%
11	Implementation of communication system between via Diaz 22A and via Diaz 21	Reduction of the risk of lack of communication between the 2 plants, particularly in the emergency phase	TO SAY	06/2019	09/2019	Number of accidents and near misses	---	---	---	06/10/2020	100%
12	Implementation of an alternative emergency communication system between the 2 plants via walkie talkie	Efficiency reduction in emergency management due to lack of communication	TO SAY	10/2019	11/2019	Number of accidents and near misses	---	---	---	06/10/2020	100%
13	Replacement of plastic tanks at the production plant in via Diaz 21	Reduction of the risk of release of dangerous substances	TO SAY	07/2019	09/2019	Number of containment leaks due to critical component failures	---	---	---	06/10/2020	100%
14	Acoustic/luminous siren/flashing warning of power failure at the plant in via Diaz 22A	Reduction of the risk of loss of control of the emergency situation and taking charge of the management	TO SAY	07/2019	09/2019	Number of accidents and near misses	---	---	---	06/10/2020	100%
15	Acoustic/luminous warning via siren/flashing light for lack	Reduction of the risk of loss of control of the emergency situation	TO SAY	07/2019	09/2019	Number of accidents	---	---	---	06/10/2020	100%

IMPLEMENTATION SCHEDULE E
IMPROVEMENT PLAN

No	Objective	Scope	manager	Work start date	Presumed completion date	Indicator	Opening document	Intermediate docs	Closing document	Date	Monitoring	Result
16	of power supply at the factory in via Diaz 21	and taking charge of the management	TO SAY	12/2019	01/2020	and near misses	---	---	---	06/10/2020		100%
17	UPS replacement in via Diaz 21	Reduction of the risk of loss of control of the management of the production process	TO SAY	12/2019	06/2020	Number of containment leaks due to critical component failures	---	---	---	06/10/2020		100%
18	Construction of IBC storage shed on waterproofed floor	Reduction of the risk of spreading on a permeable surface and increase of the possibility of containing the spread.	TO SAY	03/2020	04/2020	Number of containment leaks due to critical component failures	---	---	---	07/2020		100%
19	Replacement of the sampling device at the Leggiuno reactors 1	Reduced risk of injury and spillage	TO SAY	10/2019	01/2020	Number of containment leaks due to critical component failures	---	---	---	01/2020		100%
20	Installation of new production module at Leggiuno 2	Reduction of the risk of release of dangerous substances	TO SAY	03/2020	08/2020	Number of containment leaks due to critical component failures	---	---	---	12/27/2022		40%
21	Replacing the internal bulbs Leggiuno 1	Improved the possibility of detecting any leakage leaks	TO SAY	03/2020	12/2020	Number of accidents and near misses	---	---	---	07/12/2021		100%
22	Implementation of a fire tank level control system with automatic replenishment	Reduced risk of reduced extinguishing capacity	TO SAY	03/2020	09/2020	Number of accidents and near misses	---	---	---	12/27/2022		100%
23	Return to local control room E (Leggiuno 2 control room) of Enel presence, Enel power anomalies in	Increase in the possibility of detecting power anomalies in	TO SAY	07/2020	12/2020	Number of accidents	---	---	---	12/27/2022		100%

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INTEGRATED MANAGEMENT SYSTEM
QUALITY - SAFETY

ANNEX 4

IMPLEMENTATION SCHEDULE E
IMPROVEMENT PLAN

No	Objective	Scope	manager	Work start date	Presumed completion date	Indicator	Opening document	Intermediate docs	Closing document	Date	Monitoring Result
24	absence, generator set start-up and generator set anomalies	emergency systems and plant control	TO SAY	03/2021	07/2021	and near misses	---	---	---	07/12/2021	100%
25	Cleaning of supply ducts to the containment tanks and first rainfall	Reduction of the risk of reduced collection and containment capacity with risk of spillage on non-sealed areas	TO SAY	05/2021	06/2021	Number of accidents and near misses	---	---	---	12/27/2022	80%
26	Alternate system units increment by emergency communication between the 2 plants by walkie talkie	Reduction of the risk of inefficiency in emergency management due to lack of communication	TO SAY	06/2021	12/2021	Operators Trained as scheduled	---	---	---	12/27/2022	100%
27	Training of new figures in charge of emergency with management of technical achievement of interventions suitability	Increased professionalism in the conduct of emergency interventions	TO SAY	06/2021	07/2021	Number of accidents and near misses	---	---	---	07/12/2021	100%
28	Establishment of a dedicated number for internal emergency calls only with the installation of a dedicated set on Peracetico production reactors	Reduced risk of loss of reaction control due to incorrect temperature sensing	TO SAY	07/2021	12/2021	Number of accidents and near misses	---	---	---	12/27/2022	100%
29	Installation of double PT100 on Peracetico production system on peracetic tankers	Reduced risk of losing foot valve control on tankers	TO SAY	07/2021	09/2021	Number of accidents and near misses	---	---	---	07/12/2021	100%
30	Replacement of vapor detection sensors at the finished products warehouse in Leggliuno 2	Reduction of the risk of non-detection and detection with consequent failure to alert the emergency	TO SAY	07/2021	12/2021	Number of accidents and near misses	---	---	---	07/12/2021	100%
31	Interventions to improve emergency management	Reduction of the number of workers required to manage each hydrant	TO SAY	---	---		RR_34/2021				

Original signed document in archive

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REVISION No. 11

Page
13Of13