



HEALTH & SAFETY POLICY

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1. Purpose of the Policy

The purpose of this policy is to provide guidance to SICIT Group S.p.A. ("SICIT") and its controlled and affiliate companies (all together "SICIT Group"), directors, officers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives, to ensure compliance with applicable Health & Safety Laws and regulation.

Protecting people's health, safety and welfare are core values of the SICIT Group in conducting and developing its activities.

We are committed to working with and encouraging our business partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

The long-term goal is to aim annulment, as far as reasonably possible, the number of accidents at work and their impact on the work environment, leveraging technological investments, new policies active for the human factor and on the training and information of workers.

2. Scope

This policy applies as a minimum set of rules to all SICIT Group companies.

Locally each company should adopt more stringent rules and procedures, as needed and in accordance with local laws and regulations.

While conducting its management and coordination activities, SICIT Group respects management autonomy of each affiliate within its Group, while managing and controlling the overall business, as per legitimate interests of majority and minority shareholders, considering confidentiality requirements and local applicable laws.

3. Our approach towards health & safety

We base our business activities on the respect of the values set out in our Ethics Code, in the belief that business conduct cannot disregard ethics and the continuous improvement in occupational health and safety and welfare related aspects. We are committed to maintaining the highest possible ethical standards and to complying with all applicable laws in all countries in which we do business.

SICIT safeguards and promotes the value of its human resources, considered fundamental for the pursuit of corporate targets, committing itself to avoid discrimination of any kind and ensuring equal opportunities of professional growth, offering working conditions that are respectful of individual dignity and safe and healthy working environments.

We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the values that permeate our actions, by promoting them in the communities where we operate.

SICIT adopts a preventive approach by actively involving all stakeholders and a scrupulous assessment of health and safety risks. To this end, SICIT Group companies must identify Health & Safety risks by departments and work activities as well as the related prevention and protection measures adopted.

We respect and protect the fundamental health and safety values laid down by the laws and regulations of each country where we operate.

4. General principles

As a general rule, SICIT Group aims to provide and maintain a healthy, safe working environment and to minimize the risks to employees, contractors, visitors and others who may be affected by the activities of the company, while fulfilling consumer and customer expectations of high quality, safe products.

SICIT Group set up specific bodies to ensure the correct and adequate performance of activities aimed at eliminating or minimizing risks, to guarantee the correct flow of information between employer and worker on workplace risks.

The commitment to providing a healthy and safe working environment supports the following health and safety principles.

4.1 Health and safety regulations and best practices

SICIT Group companies must ensure the full compliance with applicable national and local laws, regulations, and codes of best practice regarding occupational health and safety.

SICIT Group companies are required to establish and revise occupational health and safety programs in accordance with the OHSAS 18001 standards and other international benchmarks for health and safety applicable to our business.

4.2 Process safety

SICIT's global process safety standards provide the framework for the safe planning, construction and operation of the plants as well as the protection of people and the environment. Our experts have developed a plan for every plant that considers the key aspects of safety and health protection – from concept to startup – and stipulates specific protection measures.

To maintain the highest level of safety at plants, across their entire life cycle, SICIT Group reviews the implementation of the protection plan in all facilities at regular intervals, in regard to risk potential, on-time performance of the required safety inspections and any resulting safety-related measures.

SICIT Group companies regularly update its plants' safety concepts in line with changing technologies as necessary and continue to improve process safety by investigating every single incident in detail, analyzing its root causes and using the findings to derive suitable preventive measures.

SICIT develops specific systems, practices and procedures to prevent accidents and, if they occur, to manage them responsibly and carefully investigate the causes with the aim of introducing measures to prevent them recurring.

4.3 Emergency response

SICIT Group companies arrange rigorously for incidents and crisis. In the event of an incident, local emergency response plans and crisis management mechanisms will be triggered, depending on the scope of the incident.

SICIT believes that qualified professionals, advanced technical equipment and science-based, effective emergency response plans are key to optimizing our emergency preparedness and improving our emergency response capabilities.

4.4 Occupational Health and Safety

The safety of our employees, contractors, neighbors and the public are a SICIT top priority. For this reason, SICIT sets goals for occupational safety and regularly monitors progress toward our goals with a set of comprehensive preventive measures.

SICIT health management serves to promote and maintain the health and productivity of our employees. Our worldwide standards for occupational health are specified in a directive that is implemented by a global network of experts. This is supported by numerous emergency drills and health promotion measures.

SICIT measure performance in health protection, using indeces, aims at monitoring recognized occupational diseases, medical emergency preparedness, first aid, preventive medicine and health promotion.

We raise employee awareness of health topics through offers tailored toward specific target groups. The SICIT health checks form the foundation of our health promotion program and are offered to employees at regular intervals.

To prevent work-related injuries, SICIT promotes:

- risk-conscious behavior and safe working practices for every individual through incident analysis and regular exchange of experiential knowledge;
- identification of health and safety risks in the workplace and commitment to control and mitigate such risks to achieve continual improvement in our health and safety performance;
- employees responsibility for their own safety and actions by providing personnel with training on health and safety issues and by making employees aware of their rights and responsibilities under applicable policies and procedures;
- check, at each modification of the programs production and / or organizational methods, that the new working methods are carried out safely;
- a reliable reporting on health and safety events such as accidents, near misses cases, remediation actions, etc. to measure performances and reduce risks;
- a sharing health and safety knowledge and good practice across the Group. These include information and training efforts, specifically aimed at promoting, compliance with legal requirements and ensuring that this policy is followed at all levels in the Group.

SICIT Group S.p.A.

Chairman

Giuseppe Valter Peretti