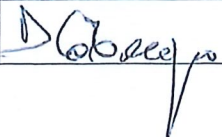
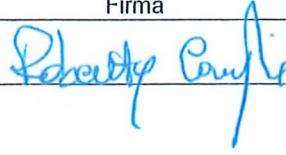
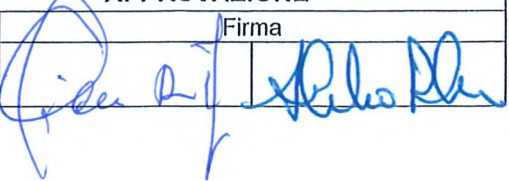


CORNAGLIA®

SAFETY AND ENVIRONMENT MANUAL

MSMSE

MANAGEMENT SYSTEM MANUAL SAFETY AND ENVIRONMENT

REVISIONI				
N. Rev.	DESCRIZIONE	Data	Rif. PARAGR.	Rif. PAGINA
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02	Update to UNI EN ISO 14001:2015	15/11/2017	Tutti	Tutte
03	Corporate change with MIA S.p.A. and implementation to UNI EN ISO 45001:2018	18/03/2019	Tutti	Tutte
04	Change of Leadership (High Management)	20/02/2020	2.1	18
05	Incorporation of Plart Design S.r.l. and relocation of the Centro Ricerca	22/03/2021	Tutti	Tutte
06	Change of Managing Director and Health and Safety Policy	21/04/2023	2.1-2.2	p.22;23
REDAZIONE		VERIFICA		APPROVAZIONE
Sigla	Firma	Sigla	Firma	Sigla
SSA		SLE		ADI
				

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1. General information and background of the organisation

1.1 Presentation of the organisation (Cornaglia Group)

The following is the history of the Cornaglia Group, whose origins date back to 12 November 1916, the year in which "Officine Metallurgiche G. Cornaglia" was founded:

- 1916 Birth of the first sheet metal working plant in Turin.
- 1961 Relocation to the new plant in Beinasco (TO).
- 1964 Launch of LIT (Lavanderia Industriale Torino), a Group company that provides industrial washing of garments and linen in Turin.
- 1967 The COR.TUBI brand is born for car and truck exhaust systems.
- 1976 New COR.TUBI plant in Valfenera (AT).
- 1983 New COR.TUBI plant in Atessa (CH).
- 1985 Acquisition of ALCOM S.p.A.
- 1987 New CORNAGLIA SUD plant at Atessa (CH).
- 1990 Acquisition of NALIN S.p.A.
- 1992 Magneti Marelli buys 30% of the Cornaglia Group.
- 1995 Pecoplast was established in Salerno, which later moved to Fisciano (SA) as Cornaglia Plastics Division.
- 1996 ISO 9002 CERTIFICATION.
- 1996 Reacquisition of the Magneti Marelli share.
- 1998 ISO 9001 CERTIFICATION.
- 1998 New Cornaglia plant in Bielsko Biala, Poland.
- 1998 LIT moves to its current plant in Casalgrasso (CN).
- 2000 Acquisition of Cowell in Romania for the production of exhaust systems for Renault/Dacia.
- 2000 AVSQ94 CERTIFICATION.
- 2001 New Cornaglia Plastics Division plant in Villarbasse (TO).
- 2002 ISO/TS 16949 CERTIFICATION.
- 2003 ISO 14001 CERTIFICATION.
- 2007 Creation of COR-FILTERS, from the acquisition of Federal Mogul, a plant located in Casarza Ligure (GE) for the production of air filters.
- 2010 Birth of LCAT, joint venture in India (Pune) between LUMAX and CORNAGLIA, air intake and exhaust systems.
- 2011 Creation of CORNAGLIA Turkey, air intake and rotational moulding systems.
- 2011 Creation of JBM COR-TUBI, joint venture in India between JBM and CORNAGLIA, exhaust systems for industrial vehicles and tractors.

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- 2012 LIT acquires the Busano (TO) plant - formerly Itallav.
- 2013 Birth of ABCOR, joint venture in USA and Canada between ABC and CORNAGLIA, air filters.
- 2013 Birth of TCOR System, industrial vehicle exhaust systems for USA.
- 2015 New CORNAGLIA SUD plant in Airola (BN), where the Atessa and Fisciano plants are moved.
- 2015 NG COR is born, joint venture in Brazil between NGC and CORNAGLIA, air intake systems and tanks.
- 2016 CORNAGLIA celebrates its 100 years of history.
- 2017 Born COR-SA, joint venture between Sabelt and CORNAGLIA, plant in Alpignano (TO) for the production of components for car seats.
- 2019 COR 2050 S.r.l. is absorbed by MIA S.p.A., the holding company of the Cornaglia Group, which provides services to the entire Group.
- 2020 A new headquarters is opened in Grugliasco (TO), where the Centro Ricerche, centralised purchasing and sales management offices are relocated.
- 2021 The Group's furniture division is transferred to Plart Design, the Research Centre laboratories are relocated to Villarbasse and the Brassicarda and Atessa sites are closed.

The Cornaglia Group currently develops advanced technological solutions for the automotive, light transport, industrial vehicles and agricultural and construction machinery sectors.

The Group consists of the following companies:

Cornaglia S.p.A., an abbreviation of Officine Metallurgiche G. Cornaglia S.p.A., produces sheet metal components, intake systems and plastic components, exhaust systems;

COR-Filters S.r.l., produces air, oil and fuel filters;

Cornaglia Sud S.r.l., produces plastic components;

Plart Design S.r.l., specialises in product development in the field of design and lighting;

and **MIA S.p.A.**, a service company that deals, for the entire Group, with administrative management, personnel management, management control, active and passive invoicing, IT services, prevention and protection service, and management of environmental and safety systems.

There are seven plants in Italy:

- Beinasco (TO): Cornaglia S.p.A. - Headquarters - Production of moulded parts (oil sumps, tanks, sheet metal); moulded parts for chassis and bodywork + MIA S.p.A. - Branch office.
- Villarbasse (TO): Cornaglia S.p.A. - Branch - Production of suction systems, moulding and blow moulding of plastic parts, rotational moulding of plastic parts. + MIA S.p.A. - Headquarters.
- Valfenera (AT): Cornaglia S.p.A. - Branch office - Exhaust systems for industrial vehicles and Centro Ricerca laboratories.

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- Grugliasco (TO): Cornaglia S.p.A. – Sede distaccata - Centro Ricerche e Sviluppo, Direzione commerciale e acquisti.
- Casarza Ligure (GE): COR-Filters S.r.l. – Sede centrale - Produzione filtri aria, olio e carburante per il settore automotive.
- Airola (BN): Cornaglia Sud S.r.l. – Sede centrale - Produzione sistemi di aspirazione, stampaggio iniezione e soffiaggio di particolari in plastica.
- Villanova (AT): Plart Design S.r.l. – Sede centrale – Produzione e commercializzazione di componenti d'arredo e illuminazione principalmente in materiale plastico

The Safety and Environmental Management System (acronym SEMS) described here applies to all companies and sites mentioned above.

There are also Cornaglia plants abroad, located in:

- Bielsko Biala (POLAND): Production of sheet metal components, suction systems and plastic tanks. Pitești (ROMANIA): Manufacturing exhaust systems.
- Pune (INDIA): Production of sheet metal components and exhaust systems.
- Bursa (TURKEY): Production of suction systems and plastic tanks.
- Nova Scotia (CANADA): Production of air, oil and fuel filters.
- São José dos Pinhais (BRASIL): Production of suction systems and plastic tanks.



Figure 1 – Cornaglia sites in the world

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1.2 Definition of the context in which the organisation operates

The Cornaglia Group currently employs a total of about 1,000 people with headquarters in Beinasco (TO) and a turnover of about 200 million euros.

The main customers of the Cornaglia Group in the automotive sector are:

- STELLANTIS (FCA / PEUGEOT)
- VOLKSWAGEN
- RENAULT / DACIA
- MITSUBISHI
- MASERATI
- MAGNETI MARELLI
- ZEUNA
- LEAR
- CNH INDUSTRY
- SEVEL
- FERRARI
- SAMSUNG
- CUMMINS
- SCANIA
- EBERSPACHER
- VOLVO
- MC LAREN
- SIAC
- FAI-KOMATZU
- CATERPILLAR
- J.C.B.
- JOHN DEERE
- LINDE
- PIAGGIO

The Cornaglia Group is divided into the following business areas:

- Sheet metal components division: for the production of oil sumps, tanks and moulded parts for chassis and bodywork.
- Intake systems and plastic components division: for the production of complete intake systems for industrial and commercial vehicles, large tanks, spoilers and sunroofs, passenger compartment components.
- Exhaust systems division: for the production of complete exhaust systems (catalytic converter) for cars, industrial and commercial vehicles.
- Research and Development Centre: develops and designs products for all other company divisions.
- Furniture Division: for the production of products in the field of lighting and plastic furniture.

The external and internal factors that may be relevant to the company's aims and strategic guidelines and that affect the Cornaglia Group's ability to achieve the results expected for its Management System (including environmental conditions that affect or may affect the Organisation), are determined, monitored and examined during the Management Review, involving all the relevant company figures.

Table 1 shows, depending on the **business context** (size of the context and internal/external factors), the **relevant stakeholders** and specifically which of these requirements become compliance obligations.

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CONTESTO					PARTI INTERESSATE							
DIMENSIONI DEL CONTESTO	FATTORI DEL CONTESTO	OBB. DI CONF.	INTERNO	ESTERNO	AD - CDA	ORGANISMO DI VIGILANZA	SOCIETA' DEL GRUPPO	DIPENDENTI	COLLETTIVITÀ	FORNITORI	CLIENTI	ENTI DI CONTROLLO
AMBIENTALE/ TERRITORIALE	CONDIZIONI AMBIENTALI "STANDARD" (QUALITA' DELL'ARIA, DEL SUOLO, DELL'ACQUA - BIODIVERSITA' – LOCALIZZAZIONE – CONDIZIONI CLIMATICHE) E IN EMERGENZA (TERREMOTI, ESONDAZIONI, ECC.)	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	DISPONIBILITA' DI RISORSE (IDRICHE – ENERGETICHE ECC.)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	IMPATTO AMBIENTALE DELL'ORGANIZZAZIONE		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	IMPATTO AMBIENTALE NS. FORNITORI			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ECONOMICO/ FINANZIARIO	COSTO COMPONENTI PRODOTTI		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	
	RISORSE FINANZIARIE (DISPONIBILITA' RISORSE PER INVESTIMENTI – ACCESSO AL CREDITO)		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>					
	SOLVIBILITA' CLIENTI			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	
	COSTI MATERIE PRIME E SERVIZI			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		
	FATTURATO AZIENDALE E INDICI DI REDDITIVITA'		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
SOCIALE/CULTURALE	REPUTAZIONE			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
	VALORI E CULTURA AZIENDALE		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
AMBIENTE DI LAVORO	ORGANIZZAZIONE DEI PROCESSI		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
	CONTINUITA' OCCUPAZIONALE		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
	IGIENE, SALUTE E SICUREZZA SUL LUOGO DI LAVORO (D.LGS. 81/08)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	CRESCITA PROFESSIONALE RISORSE UMANE		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
TECNOLOGICO/ SUPPLY CHAIN	SUPPLY CHAIN		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
	DISPONIBILITA' E ACCESSIBILITA' RISORSE TECNOLOGICHE AZIENDALI		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
MARKETING E COMPETITIVITA'	QUALITA' PRODOTTO		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
	RICONOSCIMENTO CERTIFICAZIONI AZIENDALI			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
	ANDAMENTO MERCATI E PRESENZA COMPETITORS			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>							
	ASPETTATIVE DEI CLIENTI			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
	ATTIVITA' DI COMUNICAZIONE E MARKETING		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>	
NORMATIVO/ ISTITUZIONALE	QUADRO LEGISLATIVO E REGOLAMENTARE DI RIFERIMENTO – VIOLAZIONI O SANZIONI – CONTENZIOSI IN ESSERE O PREGRESSI	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	LIVELLO DI VALORIZZAZIONE DELLE INIZIATIVE PER IL MIGLIORAMENTO SICUREZZA E AMBIENTE	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	TEMPISTICHE PROCEDIMENTI PER IL RILASCIO DI PERMESSI/AUTORIZZAZIONI	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	LINEE GUIDA, CODICI VOLONTARI...		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Table 1 – Contextual Factors and Interested Parties

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Information from interested parties is monitored and reviewed to ensure compliance with applicable requirements in the manner/responsibility described in Procedure PSA-03.

Management of safety and environmental communications.

This procedure defines how to:

- Worker participation through:
 - involvement in hazard identification, risk assessment and definition of controls
 - involvement in the investigation of hazardous incidents
 - involvement in the development and review of Safety and Environment policies and objectives

Consultation where there are changes that may affect safety at work or environmental protection (introduction of new/modified equipment, use of new materials/chemicals, reorganisations, new work processes or procedures) workers' safety representatives .

The organisation ensures that, when necessary, external stakeholders are consulted on relevant occupational safety or environmental protection issues.

In particular, the organisational structure, through the company figure of the **Safety Officer** allows, in addition to verification, the implementation and understanding of operational control procedures through interviews with workers.

1.3 Purpose and scope of the Safety and Environment Management System (SEMS)

This Manual describes the Safety and Environment Management System (SEMS) with which to coordinate and keep under control the environmental impacts and the risks for the safety and health of workers deriving from the activities, processes and products of the Cornaglia Group Plants.

The SEMS described in this Manual covers all administrative, commercial, logistic, industrialisation, design, production, procurement, personnel management and quality assurance activities that have a direct or indirect impact on the environment and on workers' health and safety. To these must be added activities indirectly linked to the production flow, such as machinery maintenance activities and the management of suppliers of products/services that may have an impact on the environment and/or the health and safety of workers.

The System is structured at Corporate level, managed centrally by the Safety and Environment department and locally by the representatives of the individual sites that make up the Corporate.

Within the Corporate Management Review, the Cornaglia Group defines year by year, according to the Environmental and Safety Policy, the location and the conditions in which it operates, both the degree of application of the system to be achieved by each site and to which new sites the certification should be extended. This Manual is valid only for all the Italian sites of the Cornaglia Group listed above, excluding foreign ones.

The field of application of the Safety and Environment Management System implemented by the Cornaglia Group is differentiated in the various plants as reported below:

- Villarbasse (Cornaglia SpA) and Airola (Cornaglia Sud Srl)

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**DESIGN AND PRODUCTION OF PLASTIC COMPONENTS THROUGH INJECTION,
ROTATIONAL AND BLOW MOULDING PROCESSES, FOR THE AUTOMOTIVE SECTOR
AND FURNITURE COMPONENTS**

- Casarza Ligure (Cor-Filters Srl)

**DESIGN AND MANUFACTURE OF FILTERS FOR ENGINES AND INDUSTRIAL
APPLICATIONS**

- Valfenera (Cornaglia SpA)

**INDUSTRIALISATION AND MANUFACTURE OF CONVENTIONAL EXHAUST SYSTEMS,
CATALYTIC CONVERTERS AND ASSOCIATED PARTICLE FILTERS FOR THE AUTOMOTIVE
MARKET**

- Beinasco (Cornaglia SpA)

**STAMPING, ASSEMBLY AND PAINTING OF SHEET METAL COMPONENTS FOR THE
AUTOMOTIVE SECTOR**

- Grugliasco and Villarbasse (Cornaglia SpA)

**RESEARCH, DESIGN AND DEVELOPMENT OF SYSTEMS, COMPONENTS AND
ACCESSORIES FOR THE AUTOMOTIVE MARKET**

- Villanova d'Asti (Plart Design Srl)

**DESIGN, PREPARATION, ALSO BY REUSE, AND STORAGE OF PLASTIC FURNITURE
COMPONENTS**

- Villarbasse and Beinasco (MIA SpA)

**ADMINISTRATIVE AND PERSONNEL MANAGEMENT SERVICES, MANAGEMENT CONTROL,
ACTIVE AND PASSIVE INVOICING, INFORMATION SYSTEMS, PREVENTION AND
PROTECTION SERVICE, MANAGEMENT OF ENVIRONMENTAL AND SAFETY SYSTEMS**

In defining the scope of its SEMS, the Cornaglia Group has taken into consideration the internal and external contextual factors described in the previous paragraph, the requirements of the relevant Stakeholders in the previous paragraph, the compliance obligations, the organisational units, functions and physical boundaries, the activities, products and services, the risks and complexities of the operations, the authority and ability of the organisation to exercise control and influence.

The above scope is maintained as documented information and is available to interested parties.

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1.4 Safety and Environment Management System (SEMS)

In order to achieve the expected results, including the increase of environmental performance and the improvement of safety in the workplace, the Cornaglia Group Management System has been designed, is kept active, systematically updated and improved (including the necessary processes and their interactions), consistently with the requirements of UNI EN ISO 14001:2015, UNI ISO 45001:2018, of SGSL INAIL Guidelines and the applicable mandatory and voluntary requirements.

In designing and maintaining its Management System, the Organisation takes into account the knowledge derived from understanding the context and the needs/expectations of the interested parties.

The Management System processes and their application throughout the organisation are determined, and in particular:

- necessary inputs and expected outputs;
- sequence and interaction;
- criteria and methods required to ensure effective operation and control of processes;
- availability of necessary resources;
- responsibilities and authorities;
- risks and opportunities in accordance with the requirements of section 3.1 of this Manual;
- ways of evaluating processes and implementing any changes necessary to ensure that the expected results are achieved;
- actions to improve the processes and the Management System.

Documented information is maintained to support the operation of the processes and is kept to demonstrate that they are being carried out as planned.

The processes managed by the Management System are:

- | | |
|---|------------|
| • Leadership process | PRIMARY |
| • Production process and service delivery | PRIMARY |
| • Procurement process | PRIMARY |
| • Machinery and plant maintenance process | PRIMARY |
| • Safety and environment service process | PRIMARY |
| • Sales process | SUPPORTING |
| • Human resources management process | SUPPORTING |
| • Administrative management process | SUPPORTING |
| • IT management process | SUPPORTING |
| • IMPROVEMENT Process | |
| ○ <i>Sub-process: Context analysis</i> | |

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- *Sub-process: Audit management*
- *Sub-process: Non-Conformity Management, Corrective Actions, Preventive Actions*
- *Sub-process: Customer satisfaction assessment*

The flow of the standard points of the Groppo Cornaglia SEMS with their correlations is schematised in Figure 2 below:

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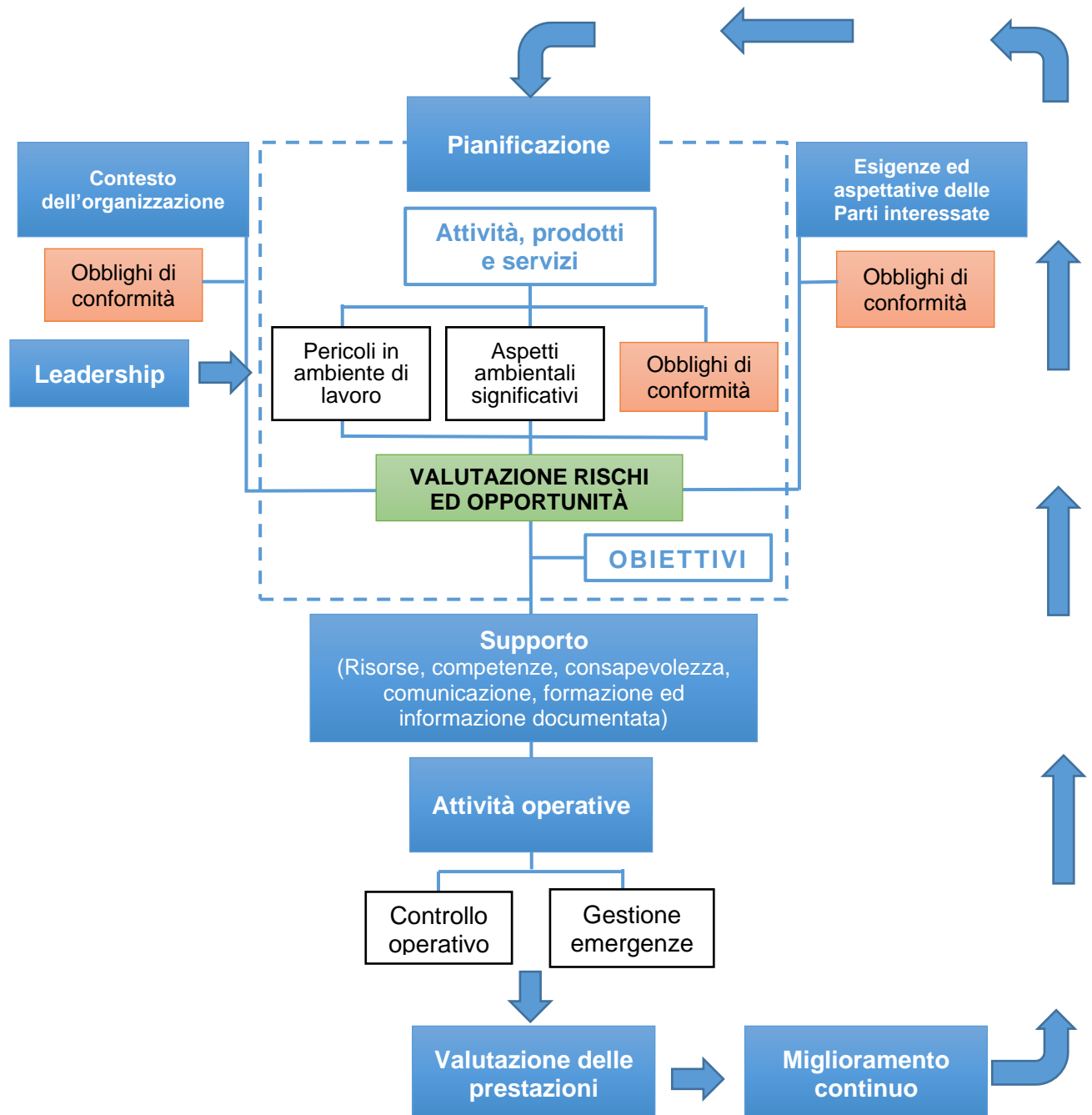


Figure 2 – Overview of SEMS flows

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1.5 Regulatory references

Nella preparazione del presente Manuale di Gestione Sicurezza e Ambiente sono stati considerati i requisiti espressi dai seguenti documenti normativi:

UNI EN ISO 9001: 2015	Quality management systems - Requirements
UNI EN ISO 9004: 2009	Quality management systems - Guidelines for performance improvement
UNI EN ISO 9000: 2015	Quality management systems - Fundamentals and terminology
UNI EN ISO 14001: 2015	Environmental management systems - Requirements and guidance for use
BS OHSAS 18001: 2007	<i>Occupational Health and Safety Assessment Series</i>
BS OHSAS 18002: 2008	Occupational Health and Safety Management Systems - Guidelines for the implementation of the OHSAS 18001 standard
UNI ISO 45001:2018	Occupational health and safety management systems - Requirements and guidance for use
UNI INAIL ISPEL	SEMS guidelines, manual and operating guide
UNI EN ISO 19011	Guidelines for audits of quality and/or environmental management systems
UNI EN 30012	Metrological confirmation system for measuring instruments
UNI CEI EN 45014	General criteria for the declaration of conformity issued by the supplier.
ISO/IEC 17025	General requirements for the competence of testing and calibration laboratories
UNI ISO/TS 16949:2009	Quality management systems - Particular requirements for the application of ISO 9001 for series production and spare parts in the automotive industry

Main references in force and binding for the Company

- D.Lgs 81/2008 – Testo Unico Sicurezza
- D.Lgs. 152/2006 – Norme in materia ambientale (Testo Unico)

In case of conflict in the interpretation of the applicable standards and documents of the Cornaglia Group Safety and Environmental Management System, the following priority criterion applies:

- Mandatory legislation (conformity obligations)
- Unified and harmonised national and international standards
- Cornaglia Group Safety and Environment Management Manual

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- **Safety and Environment System Procedures**

The Safety and Environment Management System Manual of the Cornaglia Group is issued in Italian and this version is adopted as a reference in case of conflict/dispute.

1.6 Definitions

The definitions used for the drafting of this Safety and Environmental Management Manual and the supporting procedures are those referred to in point 3 of the standard UNI EN ISO 14001:2015, standards ISO14050:2010 e UNI ISO 45001:2018.

Training

Training means the practical application of activities and provisions involving the protection of safety and health at work and the environment through practical tests in conjunction with experienced and competent personnel.

Environment

Context in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interrelations.

Note: In this case, the context extends from within the organization to the global system.

Environmental aspects

Elements of an organization's activity, product, or service that can interact with the environment.

Note: A significant environmental aspect is an environmental aspect that has, or may have, a significant environmental impact.

Auditor

Person competent to carry out an audit.

Internal audit

Systematic, independent and documented process to obtain audit evidence and evaluate it objectively, to determine the extent to which the Safety and Environment Management System meets the criteria established by the organisation and whether these provisions are suitable for achieving the objectives.

Corrective action

Action to eliminate the cause of a detected non-compliance.

Life cycle

Consecutive and interconnected phases of a system of products (or services) from the acquisition of raw materials or the generation of natural resources, to final disposal.

Proficiency

Competence expresses an individual's personal ability to perform a certain function or task, and is a combination of basic education, specific training, work experience.

Operational control

Planning of all monitoring, control, surveillance and regulatory activities to ensure compliance with

legislation, safety and environmental policy, objectives and targets

Employer

Holder of the employment relationship with the Worker or in any case the person who, depending on the type or organization of the enterprise, has the responsibility of the enterprise itself or the production unit

Document

Information with their means of support.

Note: The medium can be paper, magnetic tape, electronic or optical disc, photograph, reference sample or a combination thereof

Objective evidence

Information, records, statements of verifiable facts.

Formation

Training means the transmission not only of notions but also of principles of behaviour, of the ability to develop and formulate positive attitudes towards safety and the environment.

Management of a document

Unless otherwise specified, managing a document includes editing, issuing, distributing, storing, updating, and destroying the document.

Hazard identification

Process of recognition of the existence of a hazard and definition of its characteristics.

Environmental impact

Any environmental change, whether negative or beneficial, caused wholly or partially by the environmental aspects of an organization.

Note: any environmental impact can be considered under standard conditions (conditions of normal operation of the plant and activity), under abnormal conditions (in case of incorrect application of procedures and instructions or during the start-up and shut-down of the installations) in emergency conditions (in case of accidents or malfunctions of the installations).

Accident

An event that leads to an injury or that had the potential to lead to an injury.

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Note: an accident that does not have consequences of illness, injury, damage or other losses is also called "near injury" ("near-miss", or "missed shot by a hair"); the term accident includes "near injury".

Environmental indicators

Physical, absolute or specific, and measurable parameters that characterize the company's environmental performance.

Information

Information means the communication process carried out by means of signs and signs, signs in the departments, synoptic panels, safety data sheets, written material distributed or available to workers and interested parties.

Documented information

Information that must be kept under control and maintained by the organization and the medium that contains it.

Accident

An unintended event that causes death, illness (ill health), injury, damage or other loss.

Operational instruction

Detailed and documented indication for the execution of a single task; it defines how to do the task to which it refers.

Labourer

The person who works for an employer.

Continuous improvement

Recurrent process of increasing and improving the overall environmental performance and safety at work to which the Management System Sicurezza e Ambiente tents, consistent with the organization's Security and Environment policy.

Note: this process does not necessarily have to be applied simultaneously in all areas.

Module

Document of management, planning and registration of Safety and Environment that provides objective evidence of the implementation of the Integrated Management System Safety and Environment.

Non-compliance

Failure to comply with one or more characteristics of labour standards, practices, procedures, regulations, or the implementation of the Integrated Safety and Environment Management System that could lead, directly or indirectly, to injury or disease, damage to property, to the working and external environment, or a combination thereof.

Safety and environmental objective

Ultimate overall aim of safety and environment, consistent with the company policy that, Cornaglia aims to pursue and achieve; where possible is quantified.

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Compliance obligations (Legal and other requirements)

The legal requirements that the organization must meet and other requirements that it must or has chosen to meet.

Organizing

Group, company, company, enterprise, entity or institution, or parts or combinations thereof, whether public or private, whether or not associated, whether or not it has its own functional or administrative structure. That is, people or groups of people having their own functions with responsibilities, authority, and interrelations to achieve their goals.

Note: In organizations consisting of multiple business units, a single business unit can be defined as an organization.

Interested party

An individual or group or organisation that may influence or be affected by the environmental and occupational safety and health performance of the organisation (for example: customers, communities, suppliers, entities, investors, employees, etc.).

Hazard (hazard)

Source or situation with potential harm in terms of injury or disease (ill-health), damage to property, damage to the working and outdoor environment, or a combination thereof.

Security and Environment Policy

Cornaglia declaration of its intentions, principles and overall directives regarding its environmental and safety performance of workers, as formally expressed by senior management. The Security and Environment Policy provides a framework for the **activities and for** the definition of objectives and targets in the field of Safety and Environment.

Safety Officer

The person who supervises the activities of the employees, who is responsible for the security measures, demands their respect and reports any deficiencies to the Employer.

Performance (performance)

Measurable results of the Safety and Environment Management System, resulting from the control exercised by the organization on its environmental aspects and risks to safety and health at work

Note: Results can be measured against the Safety and Environment policy, objectives, targets, and other performance requirements of the organization.

Pollution prevention

Use of processes, practices, techniques, materials, products, services or energy sources to avoid, reduce or control (separately or in combination) the generation,

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emission or discharge of any type of pollutant or waste, in order to reduce the negative environment.

Note: Pollution prevention may include reduction or elimination at source, changes in process, product or service, efficient use of resources, replacement of materials or energy sources, reuse, recovery, recycling, remediation and treatment.

Procedure

Specified and documented way to carry out an activity or process: it defines itself as "who does" "what" and "when does". Procedures can be documented or not, they can be schematized by a flowchart or described in text form.

Recording

A document showing the results achieved or providing evidence of the activities carried out.

Register of environmental aspects

A document in which the environmental impacts from its own activities, services and products that the organisation can control and those on which it can exert an influence are recorded and assessed. The register may initially be drawn up on the basis of data from the environmental review and subsequently be updated through regular checks on environmental aspects/impacts. The register shall contain all the information necessary to identify environmental aspects and impacts.

Management review

Periodic verification and evaluation of the suitability, adequacy and effectiveness of the Safety and Environment Management System by the Company Management.

Risk

Combination of the probability and consequences of the occurrence of a given dangerous event

Tolerable risk

Risk that has been reduced to a tolerable level for the organization with regard to legal obligations and the integrated Security and Environment policy of the same.

Risks and opportunities

Potential negative effects (threats) and potential positive effects (opportunities).

Sensitization

Awareness-raising means activities aimed at raising the awareness of the worker or interested party about:

- The importance of compliance with company policy,
- The consequences, real or potential, beneficial or negative, that work activities and behavior can determine,
- The meaning of one's role and responsibility,
- The consequences of deviation from the procedures identified,

regarding the areas of Safety and Environment. Awareness-raising can be achieved through training, information and training.

Safety at work

Absence of the unacceptable risk of injury (ISO/ IEC guide 2). Absence of conditions and factors affecting the welfare of employees, temporary workers, temporary staff, visitors, contractors and any other person at the workplace.

Safety and Environment Management System

The part of the general management system of an organisation that includes the organisational structure, planning activities, responsibilities, practices, procedures, processes and resources to develop, implement, achieve, review and maintain the organization's Safety and Environment policy, manage its environmental aspects and risks, achieve its objectives.

Environmental goal

Detailed performance requirement, where possible quantified, applicable to a part or the whole of the organisation, resulting from the environmental and health at work objectives to be set and achieved in order to achieve these objectives.

Risk assessment

Overall risk assessment and decision-making process whether or not the risk is tolerable.

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1.7 Acronyms and abbreviations

Si riportano di seguito le sigli utilizzate all'interno del SEMS del Gruppo Cornaglia:

Sigla	Descrizione
AAI	Analisi Ambientale Iniziale <i>Initial Environmental Analysis</i>
ACQ	Acquisti <i>Purchasing Department</i>
ADI	Alta Direzione (Legale rappresentante / Datore di lavoro) <i>Managing Directors' Responsibility</i>
AMM	Amministrazione, finanza e controllo <i>Administration, finance and control</i>
COM	Commerciale <i>Sales</i>
CSA	Comitato Sicurezza e Ambiente <i>Safety and Environment Committee</i>
DST	Direzione di Stabilimento <i>Plant Management</i>
DVR	Documento di Valutazione dei Rischi <i>Risk assessment document</i>
FAB	Fabbricazione (resp. produzione) <i>Production manager</i>
LOG	Logistica <i>Logistics</i>
MAN	Manutenzione <i>Maintenance</i>
MGSA	Manuale di Gestione Sicurezza e Ambiente <i>Safety and Environment Management Manual</i>
ODV	Organismo di Vigilanza ex D.Lgs. 321/2001 <i>Supervisory Board pursuant to ex D.Lgs. 321/2001</i>
PCO	Tabella di Controllo Operativo <i>Operational Control</i>
PER	Gestione del Personale, paghe e contributi <i>Personnel management, payroll and contributions</i>
PRE	Preposto
PRG	Progettazione <i>Engineering</i>
GQL	Qualità <i>Quality</i>
SGSA	Sistema di Gestione Sicurezza e Ambiente <i>Safety and Environment Management System</i>
SLE	Servizio Legale <i>Legal department</i>
SSA	Servizio Sicurezza e Ambiente (RSPP/ASPP) <i>Safety and Environment Service</i>

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1.8 List of procedures Safety and Environmental Management System

The following is a list of Safety and Environment Procedures (PSA-Procedure Sicurezza e Ambiente):

Document identification	Title
PSA-01	Identification and assessment of environmental aspects
PSA-02	Managing safety and environmental compliance obligations
PSA-03	Management of safety and environmental communications
PSA-04	Management of non-conformities and corrective and preventive actions
PSA-05	Context and stakeholder needs/expectations analysis
PSA-06	Emergency management
PSA-07	Assessment of occupational safety and health risks
PSA-08	Safety and environmental audits
PSA-09	Plan of operational controls, surveillance and measurements
PSA-10	Health, safety and environment objectives and programmes
PSA-11	Management of substances and preparations
PSA-12	Documented information management of Safety and Environment Management System
PSA-13	Environmental and safety suppliers
PSA-14	Waste management

Reference documents: :

Initial ambental analysis (AAI- Analisi ambientale iniziale)

Risk Assessment Document (DVR- Documento di valutazione dei rischi)

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2. Leadership, Policy, Roles and Responsibilities

2.1 Leadership and commitment

For the purposes of the environmental and safety management system, the Cornaglia Group's top management is represented by the two Managing Directors (Amministratori Delegati- ADI), who also have full powers within the company structure in terms of environmental and workplace safety functions.

The distribution of ADI responsibilities in Cornaglia Group plants is shown below:

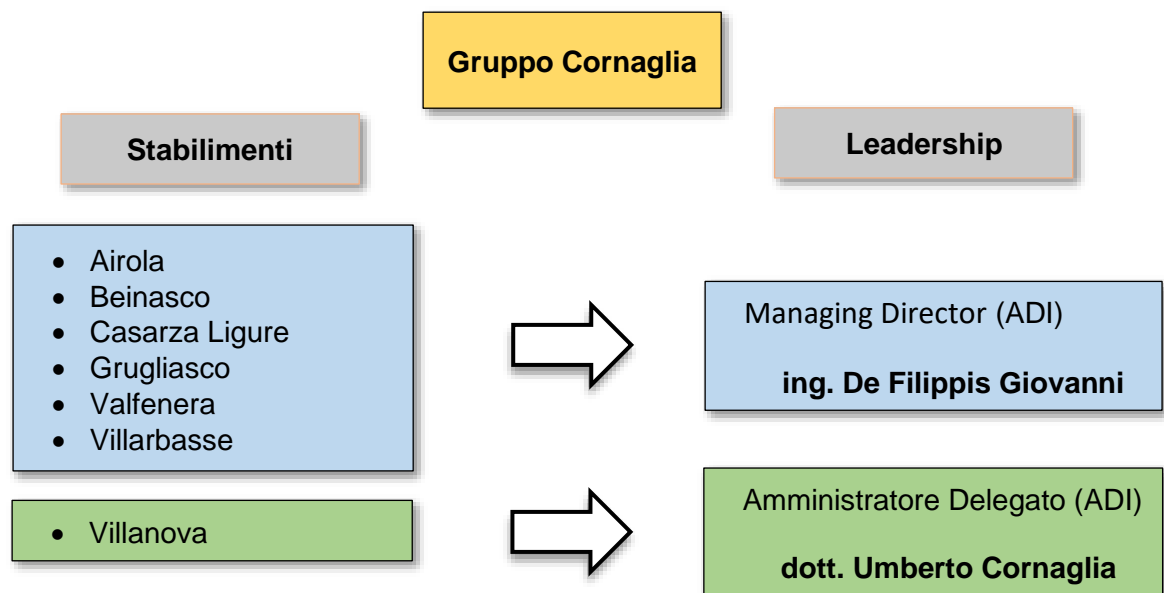


Figure 3 – Managing Directors' Responsibility Scheme (ADI) in Cornaglia Group plants

ADI provides leadership and commitment to the Safety and Environment Management System:

- taking into account the effectiveness of the safety and environmental management system;
- ensuring that safety and environmental policies and objectives are established, and that they are compatible with the organisation's strategic interests and context;
- ensuring that the requirements of the safety and environmental management system are integrated into the organisation's business processes;
- ensuring the availability of the necessary resources for the safety and environmental management system;
- communicating the importance of an effective safety and environmental management system, and of compliance with the requirements of the system
- ensuring that the management system achieves the expected outcomes;
- guiding and supporting people to contribute to the effectiveness of the HSMS;
- promoting continuous improvement;
- providing support to all relevant management roles to demonstrate their leadership and how it applies to their areas of responsibility.

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The Managing Directors' Responsibility (ADI), which reports to the Employer pursuant to Legislative Decree 81/2008 and to the Plant Manager pursuant to Legislative Decree 152/2006, is represented by the Managing Director of the Cornaglia Group, except for the Villanova plant where it is represented by the Managing Director, as identified in Figure 3.

ADI appoints a representative, with the function of Safety and Environmental Management System Manager, who is part of the management structure of the organization and in a staff position, to whom it entrusts the responsibility and the role of:

- ensure that the Safety and Environment Management System is defined, applied and maintained in accordance with UNI EN ISO 14001 and UNI ISO 45001;
- report to the Managing Directors' Responsibility on the performance of the system.

The person in charge of the Safety and Environment Management System is the RSPP of the Cornaglia Group, appointed by the Employer after checking his professional skills and requirements.

2.2 Environmental and Safety Policy

ADI has established, implements and maintains an Environmental and Safety Policy that:

- is appropriate to the aims and context of the organisation (including the nature, scale and environmental impacts of its activities/products/services, and the nature and scale of risks) and supports its strategic direction;
- provides a framework for setting and reviewing the organisation's objectives;
- includes a commitment to environmental protection (including pollution prevention) and other specific commitments relevant to the context of the organisation;
- includes a commitment to comply with applicable requirements, its own compliance obligations and other requirements to which the organisation subscribes;
- includes a commitment to prevent occupational accidents and illnesses;
- includes a commitment to continual improvement of the Management System to enhance its performance;

The Policy is available and maintained as documented information, it is communicated, understood and applied within the Organisation by all those who work under its control, and is made available to interested parties in the following ways:

- Displayed inside the company facilities so that external visitors can also view it
- Shared on the company network
- Published on the company website
- Explained during meetings and trainings to ensure complete understanding
- Sent by fax/e-mail to Suppliers as part of the qualification process.

During the Annual Management Review, ADI reviews the content and assesses its suitability and adherence to the needs of the organisation.

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Annex 1: Environmental and Safety Policy



CORNAGLIA GROUP HEALTH AND SAFETY POLICY

For over 100 years CORNAGLIA has been committed to minimizing, as far as technically and economically sustainable, the environmental impacts associated with its activities and the risks to the health and safety of its workers. With the same commitment and attention, CORNAGLIA Group, which includes the companies Cornaglia S.p.A., Cor-Filters S.r.l., Cornaglia Sud S.r.l., Plart Design S.r.l. and the holding MIA S.p.A. decided to develop and apply a safety and environmental management system compliant with UNI ISO 45001 and UNI EN ISO 14001 standards. The sustainable development, the circular economy and the protection of the health and safety of workers represent, for all companies of CORNAGLIA Group, strategic elements which must be controlled, maintained and improved through a system of environmental and safety management inspired by the following fundamental principles:

- to meet the obligations of compliance with applicable legal requirements and voluntary agreements signed by CORNAGLIA Group;
- to identify the dangers associated with the activities and to assess the risks in advance (workplace ergonomics, risk of electrocution, danger of physical contact, fire accident, handling of chemicals), adopting solutions able to prevent accidents and professional pathologies (personal protective equipment, machine safety, emergency preparedness, fire protection, incident and accident management), and in any case to minimize, as far as technically possible and economically compatible, their possibility of happening;
- to develop the procedures in order to assess the environmental and safety performance, by considering a life cycle perspective, which, by means of appropriate indexes, represent a reference for the control and continuous improvement of the system;
- to design new processes and products reducing the impact on environment and on health, also through the recycling and reuse of materials at the end of their life, and maintaining high quality standards;
- to choose materials and components which, after verifying compliance with current regulations (for example: Reach and Conflict Minerals), are less dangerous for human health and the environment; through responsible chemical management policy, with the aim of reducing hazardous waste;
- reduce the impact on the environment, promoting a decarbonisation policy, with the aim of reducing GHG emissions, improving air and water quality and improving energy efficiency also through the reduction of plant consumption, favoring the use of renewable sources and sustainable resources management of energy and water;

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- to involve market partners and suppliers of products and services, under the control of the CORNAGLIA Group or influenced by it, in order to limit the environmental impact of its products / services throughout the life cycle by sharing Best Practices - Involve market partners and suppliers of products and services, under the control or influence of the CORNAGLIA Group, in order to limit the environmental impact of its products/services along the entire life cycle, through the sharing of Best Practices for the definition and implementation of similar standards to own 1-tier suppliers.
- to raise the awareness of CORNAGLIA Group's employees and all the workers that work on its behalf, so that they are aware of the environmental impacts and dangers to health and safety associated with their activities, and to undertake to operate in compliance with the environmental and safety procedures, contributing to the achievement of CORNAGLIA Group's objectives.

Turin, 21/04/2023

Chief Executive Officers


Managing Director


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2.3 Roles, responsibilities and authority

ADI has clarified and made known the responsibilities, authorities and mutual interrelationships between the different roles in the organisation. A company Organigram has been drawn up for each plant, and the tasks relating to the various company functions have been identified. In particular, the ADI assigns responsibilities and authorities to ensure

- the compliance of the Management System with the international reference standards;
- the monitoring of processes to ensure that the expected outputs are achieved;
- information, in particular to the ADI, on the performance of the Management System and on the opportunities for improvement;
- maintaining the integrity of the Management System when changes to the System are planned/implemented.

The relevant functions in the Safety and Environment Management System is:

Safety and Environment Committee (CSA-Comitato Sicurezza e Ambiente)

The CSA is chaired by the ADI and includes, by right, the Legal Department (SLE), the Safety and Environment Manager and, if necessary, the Personnel Department and the Plant Management (DST).

The CSA reports directly to ADI and has the task of checking the Safety and Environmental Management Manual, reviewing the Safety and Environmental System and planning continuous improvement. The CSA meets monthly and whenever special needs arise.

Legal department (SLE- Servizio Legale)

The SLE reports directly to ADI and is responsible for directing all legal activities within the Cornaglia Group. The SLE coordinates the Safety and Environment Service (SSA-Servizio Sicurezza e Ambiente) and the activities foreseen by the Safety and Environment Management Manual.

The SSA is responsible for issuing and distributing the documentation of the Company's Safety and Environmental System, their application and updating.

Safety and Environment Service (SSA-Servizio Sicurezza e Ambiente)

It is responsible for ensuring compliance with current legislation on safety and the environment. It monitors and periodically checks the impact of the company's activities on the environment and the risks to workers' health and safety. It guarantees the choice of prevention and protection measures for workers in the field of safety through the Prevention and Protection Service (SPP) and environmental protection through the SGSA (Safety and Environmental Management Service).

The SSA is coordinated by the RSPP (Prevention and Protection Service Manager) who, possessing suitable aptitudes and professional skills, is appointed directly by the Employer in order to coordinate the activities of hygiene and safety in the workplace, bringing them into line with the best international standards in compliance with current legislation.

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The RSPP, in collaboration with the Medical Officer (MC) and the Plant Management (DST), draws up and updates the Risk Assessment Document, plans and controls preventive and protective measures against risks during work activities, manages worker training/information on emergency procedures and protection against risks and dangers to health and safety, and proposes the continuous improvement measures provided for in the Safety and Environment Management System (SGSA).

Plant Management (DST-Direzione Stabilimento)

The DST reports directly to ADI and is responsible for all production activities carried out by the plant, having a mandate granted by ADI of the authority for Safety and Environment in the plant under its responsibility.

Competent Doctor (MC-Medico Competente)

The MC is appointed by the ADI and is responsible for:

- make judgements of suitability in relation to the specific task performed by each worker;
- carry out health surveillance;
- keep the health and risk file of each work;
- inform workers of the significance of the health checks carried out;
- visit the workplace twice a year,
- take part in the periodic meeting provided for in Article 35 of Legislative Decree 81/2008 s.m.i.;
- collaborate in the preparation of the first aid service;
- cooperate in health information and training activities.

Safety Officer

Each department manager, in his capacity as supervisor, is responsible for:

- applying, for the areas under his responsibility, the Safety and Environmental Management System outlined herein and disseminating it at all levels,
- supervising the work activity, ensuring the implementation of the directives received,
- monitor the correct implementation by workers of such directives,
- exercise a functional power of initiative
- strive for the continuous improvement of performance in terms of health and safety at work and environmental protection.

Worker

Person who, regardless of the type of contract, carries out a work activity within the organisation. Each worker must

- take care of his own health and safety, as well as that of other people present in the workplace on whom the effects of his actions and/or omissions may fall,
- be aware of the environmental aspects under his control, in accordance with his training and the instructions and means provided by the organisation.

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Workers' Safety Representatives (RLS- Rappresentante dei Lavoratori per la Sicurezza)

The RLS is elected by the workers and has the possibility to:

- access to the workplaces;
- consult in advance and in a timely manner on risk assessment, identification, planning, implementation and verification of prevention.

In addition:

- is consulted on the designation of the persons in charge of the SPP, fire prevention activities, first aid and evacuation;
- is consulted on the organisation of training;
- may receive information and company documentation on risk assessment and prevention measures relating to machinery, plants, organisation and work environments, accidents and occupational diseases, as well as those relating to dangerous substances and preparations;
- may receive information from the supervisory services and make comments ;
- must receive appropriate training;
- promotes the elaboration, identification and implementation of suitable prevention measures to protect the health and physical integrity of workers;
- takes part in the periodic meeting provided for in Article 35 of Legislative Decree 81/2008;
- warns the person in charge of the company about the risks identified in the course of his activity.

The Managing Directors' Responsibility recognises in the Legal Department, through the SSA function, the necessary authority to carry out operationally the activities foreseen by the Safety and Environment Manual in the plants in compliance with UNI EN ISO 14001, UNI ISO 45001 and the Safety and Environment Management System.

In addition, the Managing Directors' Responsibility provides the Legal Department, the Safety and Environment Service and the Plant Management with all the resources necessary to implement, control and improve the Safety and Environmental Management System in terms of human resources, specialist or technological skills, financial resources and organisational infrastructure.

The specific job descriptions of all the Functions of the Organisation are kept and updated by the Human Resources office.

2.4 Worker consultation and participation

The Cornaglia Group encourages the active and continuous participation and consultation of workers in the development and review of practices for the prevention and control of activities concerning safety, health and the environment, as well as in the development of the SGSA and the application of compliance obligations.

Worker consultation and participation processes also include contractors and other stakeholders, e.g. people working in parts of the Cornaglia Group, performing work under the control of the organisation.

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Workers are involved in activities such as:

- Hazard identification and assessment of risks and opportunities;
- Determination of actions to eliminate risks or reduce risks to health, safety and the environment;
- Determining competence requirements and conducting a training needs analysis;
- Determining what needs to be communicated and how it will be done;
- Determination of control measures and their effective implementation and use;
- Analysis of accidents and/or near misses, dangerous actions and dangerous conditions;
- Management of non-conformities and determination of corrective actions.

Consultation and participation of workers is activated in the following cases:

- New or unknown hazards (including those that could be introduced by contractors);
- Company or Group reorganisation;
- New processes, procedures or working models;
- The construction, modification or change in use of buildings and facilities;
- The introduction of new or modified equipment;
- Implementation of new controls or modification to existing controls;
- The use of new chemical substances or preparations, or new materials in general;
- Changes in emergency management;
- Changes to the requirements of compliance obligations.

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3. Planning

3.1 Actions to address risks and opportunities

Managing Directors' Responsibility plans the activities of the Management System, with the support of Safety and Environment Service, Plant Management and the various Managers, considering the external/internal factors relevant to its goals and strategic directions (including environmental conditions influenced or capable of influencing the Organisation), the requirements of the relevant Stakeholders, the environmental and safety conditions, the compliance obligations and the scope of the Management System, and has determined the risks and opportunities that need to be addressed in order to:

- ensure that the Management System can achieve the expected results;
- increase the desired effects;
- prevent/reduce undesirable effects, including the possibility that external environmental conditions influence the organisation;
- achieve continuous improvement.

The analysis of risks and opportunities is in fact considered by the Cornaglia Group as a key element that binds together the different factors that contribute to the development of the Safety and Environment Management System planning. The characterisation of the context, of the needs/expectations of the interested parties, of the (significant) environmental aspects, of the hazards present in the working environment and of the relative compliance obligations, in fact, brings to the attention of the organisation a series of elements to which risks and opportunities may be associated. The risks and opportunities are then assessed by the organisation to define which ones must be addressed to prevent or reduce undesirable effects that may prevent the expected outcomes of the Safety and Environment Management System from being achieved (continuous improvement of environmental and safety performance, maintaining full compliance with conformity obligations, achievement of environmental and safety objectives, etc.).

Based on the assessment of which of the identified risks and opportunities must be addressed to

On the basis of the assessment of which of the identified risks and opportunities need to be addressed to prevent or reduce undesirable effects, ADI defines the actions to be taken which will then be integrated into the Safety and Environment Management System processes (e.g. environmental objectives, resources, training, communication, operational control, emergency preparedness and response, monitoring, etc.).

Based on the assessment of which of the identified risks and opportunities need to be addressed in order to

On the basis of the assessment of which of the identified risks and opportunities need to be addressed to prevent or reduce undesired effects, Managing Directors' Responsibility defines the actions to be taken which will then be integrated into the Safety and Environment Management System processes (e.g. environmental objectives, resources, training, communication, operational control, emergency preparedness and response, monitoring, etc.).

This logical flow is exemplified in Figure 4:

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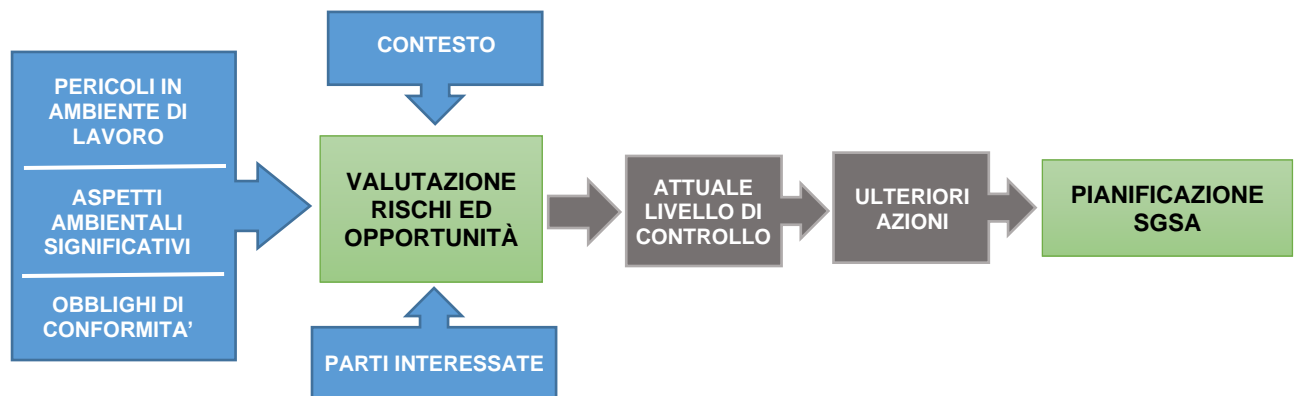


Figure 4 – Risk/opportunity analysis scheme and Safety and Environment Management System (SGSA) planning

The analysis of risks and opportunities arising from the characterisation of the context, stakeholder needs/expectations, (significant) environmental aspects and related compliance obligations, shall lead the organisation to assess whether it is appropriate to plan further actions, in addition to those already in place within the SGSA, to improve the current level of control and thus ensure the progressive achievement of the expected outcomes of the SGSA.

Procedure **PSA-05 "Analysis of the Context and of the Needs/Expectations of the Interested Parties"** illustrates the methods for assessing the Risks and Opportunities linked to the Organisation's Context and to the needs and expectations of the Parties; for the assessment of the environmental aspects and of the safety risks, see the following paragraph.

Within the scope defined for the Management System, the organisation has identified potential emergency situations, including those that may have an impact on the environment and/or on the health and safety of workers.

Documented information is maintained concerning

- risks and opportunities that need to be addressed, also in relation to the Context and Interested Parties;
- process planning activities, to the extent necessary to have confidence that they are carried out as planned.

In planning these actions, ADI takes into account the technological options, financial, operational and organisational requirements of the Cornaglia Group. All'interno del campo di applicazione definito per il Sistema di Gestione, l'Organizzazione ha individuato potenziali situazioni di emergenza, comprese quelle che possono avere un impatto sull'ambiente e/o sulla salute e sicurezza dei lavoratori.

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3.2 Environmental aspects and safety risk assessment

Details of the activities carried out by the Cornaglia Group to assess environmental aspects and risks to workers' health and safety are contained in procedures **PSA-01 "Identification and assessment of environmental aspects"** and **PSA-07 "Assessment of risks to health and safety in the workplace"**. PSA-07 identifies the Risk Assessment Document (DVR- Documento Valutazione dei rischi) prepared in accordance with Articles 28 and 29 of Legislative Decree 81/08.

In particular, the following are identified and assessed by the Cornaglia Group:

1. The organisation's activities/products/services directly associated with environmental aspects or possible hazards to workers' health and safety

For examples

- Atmospheric emissions generated by the rotational moulding furnaces at Villarbasse
- Water discharges generated by the Beinasco purification plant
- Noise emitted by blow moulding machines at Airola and Villarbasse
- Handling of loads in the working activities at Valfenera

In order to identify these aspects and/or potential hazards, the activity carried out is broken down into homogeneous phases (processes) and the actual or potential impact (in case of failure or accident) and the risk for workers' health and safety are analysed for each element. The associated environmental impacts are considered from a product/service life cycle perspective

The Employer carries out the Worker Health and Safety Risk Assessment in cooperation with the Head of Prevention and Protection Service and the Competent Doctor, and after consultation with the Workers' Representative for Safety.

A scale of values is identified for determining significance, with attribution criteria for each environmental aspect or hazard encountered. The environmental impacts and risks assessed are considered significant if:

- they exceed a set threshold,.
- they are subject to compliance obligations.

For all risks considered significant, the Risk Assessment Document indicates the measures adopted to reduce them, chosen according to the hierarchy::

- elimination of the hazard;
- replacement with a lesser hazard in relation to knowledge acquired as a result of technical progress;
- technical measures for collective protection;

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- organisational measures (e.g. limiting the number of exposed persons), ,
- personal protective equipment.

Information regarding environmental aspects is kept accessible through the form MSA-061 "Assessment of environmental aspects" as required by PSA-01.

A copy of the "Risk Assessment Document" can be given to the workers' safety representatives upon their request.

2. The organisation's activities/products/services indirectly associated with significant environmental aspects or possible hazards to workers' health and safety..

For example

Design of new production lines or products

Activities under the organisation's control indirectly associated with significant environmental aspects and/or assessment of hazards to workers' health and safety, including changes in the context and/or needs/expectations of interested parties, are managed through the form MSA-062 "Assessment of changes and new installations".

3. The organisation's influential activities/products/services associated with significant environmental aspects or possible hazards to workers' health and safety

For example

Atmospheric emissions generated by the Villarbasse rotational moulding furnace, potentially affected by maintenance of abatement systems carried out by a third party

Outsourcing activities

Service contracts carried out within the site that may interfere with work activities

The activities/products/services that are not under the direct control of the organisation, that can be influenced and that are significant for their repercussion on the organisation's aspects and/or on the health and safety of the workers are identified by SSA, as indicated in the PSA-01, The interferences are instead managed with the Assessment of Risks from Interference Single Document (DUVRI- Documento Unico di Valutazione dei Rischi Interferenti) prepared by SSA using the form MSA-024 "Contracting or work contract - Information on risks and joint risk assessment".

In all the above cases, abnormal conditions and reasonably foreseeable emergency conditions are also assessed.

3.3 Compliance Obligations

Procedure **PSA-02 "Management of Safety and Environmental Compliance Obligations"** describes the activities carried out by the Cornaglia Group to ensure this standard point.

First of all, it analyses

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- all environmental and occupational health and safety regulatory issues, using existing databases, documents of business associations, bibliographies, texts, etc.;
- all administrative acts on environmental and workers' health and safety matters held by the organisation (authorisations, permits, ordinances, etc.);
- any agreements or commitments voluntarily entered into by each Group company in the environmental or safety field.

Therefore, based on knowledge of the elements of the activity and products that have significant impacts, it is identified which are the laws, standards and other legal documents applicable to the organisation, hereinafter referred to as "compliance obligations".

The SSA shall acquire and archive the texts of these regulations, administrative acts and voluntary

The requirements and fulfilments deriving from these compliance obligations applicable to the activity performed by the organisation as well as to the conformity assessment are then identified. These requirements/fulfilments are recorded in the List of compliance obligations (following form MSA-010-1 as described in PSA-02).

To ensure regulatory updates, subscriptions to legislative databases are made and information received from the Turin Industrial Union and the specialised press is examined.

Any new voluntary environmental and occupational safety agreements or commitments must be promptly communicated by the relevant departments to SSA, using form MSA-062.

Regulatory change involves reviewing and, if necessary, updating the above list.

Product and/or process modification involves review of compliance with applicable requirements in accordance with PSA-02 and identification/research of any other standards that become compliance obligations with subsequent updating of the Compliance Obligation List.

3.4 Environment and Safety Objectives and Targets

On the basis of the environmental policy statement and pollution prevention, respecting the applicable requirements and the concept of continuous improvement and protection of workers' health and safety, the SSA, possibly in cooperation with Technical Services and Maintenance, proposes objectives and targets that must be measurable and periodically reviewed, taking into account technological and operational options and financial and commercial requirements.

The objectives and targets proposed by the SES are submitted to the plant management for definition and approval, as foreseen in the procedure **PSA-010 "Health, safety and environmental objectives and programmes"**.

After approval, the SSA draws up the Safety and Environmental Management Programme, which includes:

- responsibility for implementation
- description of the environmental aspects and risk factors considered
- objectives and targets for each aspect/risk factor considered
- estimated costs

The Safety and Environmental Management Programmes are managed by the Plant Management and periodically analysed in the following points:

- progress
- description of activities carried out

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- results obtained
- date of completion

The Safety and Environmental Management Programme is reviewed by the SLE and Site Management (DST) and approved by ADI in the Safety and Environmental Committee (SES).

The Safety and Environmental Management Programme is reviewed quarterly, when the environmental and safety policy is updated and during the periodic Management Reviews.

The activities planned, but not completed in the manner and within the timeframe envisaged, are the subject of discussion with the bodies involved and the relative Process Owners to identify the causes and update the implementation timeframes. The convening of the meeting to discuss these issues is done by SSA.

3.5 Planning activities

The organisation shall plan

- the actions to address risks and opportunities (which shall be proportionate to the potential impact on the environment and occupational safety), significant environmental aspects, risks present in the work environment and compliance obligations;
- the methods for integrating/implementing the actions into the SGSA processes and for assessing their effectiveness.

In planning these actions, the Cornaglia Group considers its technological options and financial, operational and business requirements.

Every change made to the SGSA must be planned/analysed for the potential consequences it may cause. In any case, ADI guarantees the integrity of the Management System also through the continuous availability of resources and the correct definition of responsibilities and authorities. The methods for managing changes within the Organisation are managed through the MSA-062 module. In particular, before initiating any changes, it identifies hazards/risks associated with the SGSA or the activities performed.

The organisation shall ensure that the results of the assessments are taken into account in the definition of the risk control measures, which shall be carried out according to the following hierarchy (see also section 3.2 of this Manual)

- elimination;
- replacement;
- technical control measures;
- signage, instructions and/or management control measures;
- personal protective equipment.

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4. Implementation and operation

4.1 Organisational Structure

For the purposes of the environmental and safety management system, the Top Management (ADI) of the organisation, Cornaglia Group, is represented by the Managing Director of the Group and the Managing Director for Villanova, who within the corporate structure have full powers in functions relating to the environment and safety at work.

The duties and responsibilities of the ADI include coordinating the activities of the operational departments (DST) and staff departments and defining short, medium and long-term objectives.

Pursuant to Legislative Decree 81/2008 and Legislative Decree 152/2006, the Employer and Plant Operator is represented by the ADI, which has chosen not to delegate these functions.

A proxy could be considered valid subject to the following limits and conditions:

- a) that it results from a written deed bearing a certain date;
- b) that the delegate has all the requirements of professionalism and experience required by the specific nature of the delegated functions
- c) it confers on the delegating party all the powers of organisation, management and control required by the specific nature of the functions delegated; and
- d) it confers on the delegatee the autonomy of expenditure necessary for the performance of the delegated functions;
- e) that the delegation is accepted by the delegate in writing.

The delegated person may in turn, upon agreement with the Employer, delegate specific functions on health and safety at work under the same conditions as above. The delegation of functions referred to in the first sentence does not exclude the delegating party's obligation to supervise the proper performance of the transferred functions. The person to whom the delegation referred to in this paragraph has been conferred may not, in turn, delegate the delegated functions.

In any case, the Employer may not delegate the activities of risk assessment and appointment of the person in charge of the prevention and protection service, as well as the identification of major accident hazards and the adoption of appropriate safety measures.

The ADI appoints a representative, with the simultaneous function of Environmental and Safety Management System Manager, who is part of the organisation's management structure and in a staff position at the Group, to whom it entrusts the responsibility and role of

- ensuring that the SGAS is defined, applied and maintained in compliance with UNI EN ISO 14001 and UNI ISO 45001 standards;
- reporting to the DIR on system performance.

The person in charge of the Environmental and Safety Management System coincides with the RSPP appointed by the Employer after checking his professional skills and requirements.

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ADI assigns, in the various documents of the system, the responsibilities of the other functions of the organisation for the activities inherent to the SGSA.

In order to implement and control the Cornaglia Group SGSA, ADI provides the following resources

- the Management Representative and SGAS Manager is assisted by the SSA operational unit representing the Prevention and Protection Service with the task, pursuant to Article 33 of Legislative Decree 81/08, of identifying risk factors, assessing risks, identifying preventive and protective measures to ensure the safety and healthiness of workplaces, drawing up safety procedures and proposing information and training programmes for workers;
- within each production area, the persons in charge are identified, with the task of ensuring that workers comply with legal obligations and the provisions of the Organisation, as well as the use of PPE; to promptly report to the Employer or the manager any deficiencies in the means and work equipment and PPE, as well as any other dangerous condition occurring during work;
- a specific (annual) budget is set up, resulting from the approval of the improvement programme, containing the planned actions and the consequent human and economic resources for their implementation;
- additional funds are allocated in the budget (in addition to the approved improvement programme budget) containing the expenses necessary for the functioning of the SGSA such as, if necessary
 - external specialist expertise (e.g. for audits of the EMS);
 - purchase of specific technologies (e.g. management software, testing, databases, etc.);
 - specialised training (not foreseen on the environmental and safety programme).

The communication of what is contained in this section takes place in the manner established in chapter 4.3 of this Manual.

The review of the structure and responsibilities takes place annually during the management review (see chapter 6.1 of this Manual).

If the need for changes arises as a result of the review or as a result of other needs of the organisation (e.g. staff turnover), this is done in the same way as described above.

4.2 Competence, training and awareness

All people working for the Cornaglia Group or on its behalf (new hires, existing employees, contractors and any other parties involved), who may cause impacts on the environment or risks in the workplace or failure to comply with compliance obligations, are subject to specific training and subsequent competence assessment. Through this activity, the level of awareness is raised, with particular reference to the following aspects:

- compliance with environmental and health and safety policy,
- knowledge of the Safety and Environment Management System,
- knowledge of the consequences of their individual activities on the environment and the workplace,
- knowledge of the benefits of improving individual performance on the environment and in the workplace,
- roles and responsibilities, especially in emergency conditions,

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- knowledge of the consequences in case of deviations from company procedures, SGSA requirements and/or compliance obligations.

The operating methods for managing training in the Cornaglia Group are described in Corporate Procedure **P003 - "Staff training"**, under PER, which also describes how appropriate documented information is kept as evidence of skills/awareness.

4.3 Internal and External Communications

Procedure **PSA-03 "Management of safety and environmental communications"** describes the activities carried out by the Cornaglia Group to guarantee this standard point.

ADI, through SLE and the SSA function, disseminates the objectives and targets achieved and to be pursued within the Safety and Environment Management System, in the form of documented information through

- posting notices on notice board,
- distribution of booklets to personnel,
- awareness/information meetings.

In this way, the aim is to maintain widespread and continuously updated information on environmental and safety issues, contributing to increasing and consolidating the general awareness of personnel.

Staff are:

- represented by the RLS on health and safety issues,
- informed of the names of their representatives and the workers in charge of managing the Safety and Environment System,
- involved, through their representatives, in the development and review of risk management policies and procedures,
- consulted through periodic meetings of their representatives on health and safety in the workplace.

As far as environmental aspects and possible risks of emergencies are concerned, these are reported by company personnel by filling in internal communication forms. In the event of a risk being detected, plant personnel are informed of this possibility by means of official notices displayed on notice boards. Subsequent management of any non-conformities takes place in accordance with procedure **PSA-04 "Management of non-conformities and corrective and preventive actions"**.

The types of external communications can be traced back to:

- environmental complaints from external sources: environmental and/or safety complaints are managed by filling in the Safety and Environment Complaints form;
- disclosure of the Cornaglia Group Safety and Environment Management System: the Policy, the programme and the goals pursued and/or achieved in terms of safety and environment are available at SSA and can be made known to customers and/or interested third parties upon their

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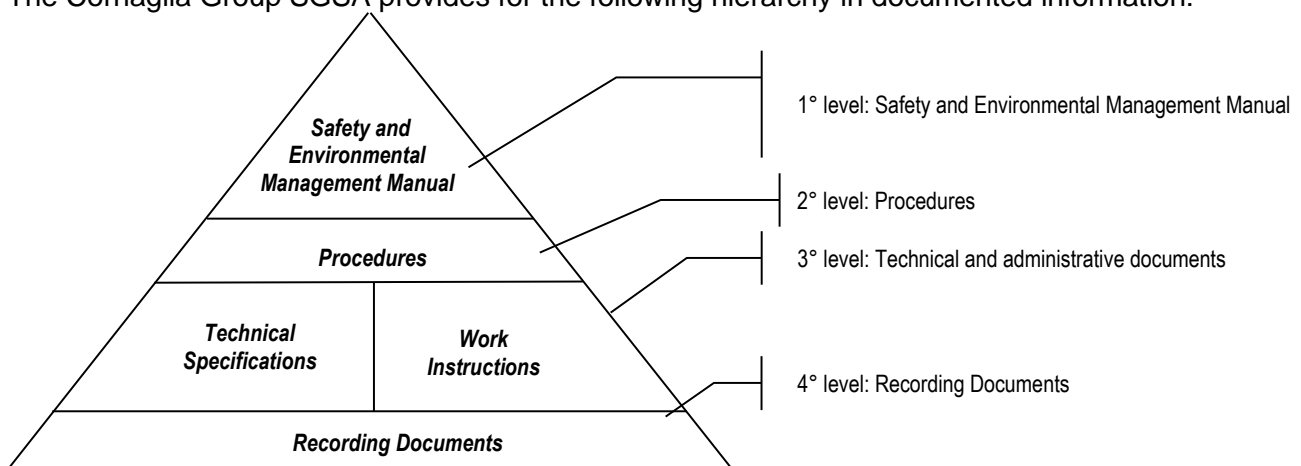
explicit request. The dissemination of the Cornaglia Group commitment and of the safety and environmental prescriptions to be complied with is also made available to its suppliers, if necessary, through specific documents drawn up by SSA;

- correspondence regarding safety and the environment: this correspondence is received from entities external to the Cornaglia Group. Details on how and when to reply are reported in the procedure PSA-03 "Management of communications on safety and environment".

At present, the Cornaglia Group does not intend to disclose, unless explicitly requested, its aspects and related impacts resulting from its activities. However, internal communication within the Group is free.

4.4 SGSA Documented Information

The Cornaglia Group SGSA provides for the following hierarchy in documented information:



- The ***Safety and Environmental Management Manual*** describes the Safety and Environmental Management System and the way in which the individual environmental impacts/risks are controlled. This document is an informative/reporting document and is addressed to both the company's internal and external parties (customers and/or control bodies).
- The ***Integrated Quality Assurance and Safety and Environmental Management Procedures*** are informative/organisational documents. They describe the performance of activities and define responsibilities. Procedures are internal company documents and support the MGSA.
- ***Technical Specifications*** are information/description documents. They define in detail how the activities described in the Procedures are carried out. Technical Specifications are internal company documents and support the Procedures.

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- **Work Instructions** are working documents at operational level. They define in detail the rules for carrying out the activities of the operational processes. Work Instructions are internal company documents and support the Procedures.
- **Recording Documents** are documents at the information/point level. They are the ones on which records of the activities carried out within the Safety and Environment Management System are made.

All documentation is drawn up in compliance with the criteria of ISO TS 16949, ISO 9001, UNI EN ISO 14001 and UNI ISO 45001, for more details see procedure **PSA-12 "SGSA documented information management"**.

4.5 Creation, updating and control of documentation

Documentation of both internal and external origin is managed according to the methods described in procedure **PSA-12 "SGSA documented information management"** and in the Cornaglia Group Quality System procedures themselves.

The first draft of the Safety and Environmental Management Manual (MGSA) is prepared by the SSA in compliance with the requirements of ISO TS 16949, ISO 9001, UNI EN ISO 14001 and UNI ISO 45001. The draft MGSA in preparation takes into account existing Procedures and the functional and organisational needs of the Cornaglia Group.

This draft is sent to the relevant Departments and Functions for comments and observations to be submitted to the CSA. After discussion with the CSA, the MGSA is drafted in final form. The MGSA is signed by the SSA as drafting, by the SLE, representing the CSA, as verification. The ADI gives the final signature for approval and authorisation to issue the document.

The MGSA is distributed to internal functions and external bodies under the responsibility of the SSA.

The evidence of the revision status is reported on the first page of the chapters of the MGSA where the signatures of drafting, verification and approval of the MGSA by the competent Functions are placed.

In the event of substantial organisational changes, the MGSA is reissued in the next edition and the revision index is reset to zero.

Manual, Procedures and Instructions are distributed in controlled form generally in paper form; they are also distributed by computer (software data in electronic form are managed with the appropriate access keys by those responsible for them). Other documents may be distributed in electronic form.

4.6 Operational Control

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The purpose of this chapter is to define the criteria for the proper management of all activities that may generate environmental impacts and/or health and safety risks, in accordance with the SES Policy, Cornaglia Group objectives and targets, site-specific objectives and/or compliance obligations.

Operational control is applied to all operational and management activities, carried out directly and those entrusted to contractors, which may have a significant environmental impact or constitute an actual or potential health or safety risk, with particular attention to interference risks.

The SSA, also taking into account the guidelines and procedures, the Best Practices, the collaboration of any external consultants, supports the various Function Managers and Technicians in defining and applying appropriate methods of carrying out the various activities (both routine and non-routine activities), giving priority to the criteria of prevention of problems.

In particular, procedures are prepared and implemented to:

- regulate the performance of activities relevant to Environment and Safety, including maintenance;
- define and describe in a detailed, clear and complete manner the operating methods to be implemented in the context of each procedure;
- prevent any situation in which the absence of specific procedures could lead to inadequacy, non-compliance and/or danger, deviations from the applicable requirements or from the policy and objectives;
- also define and describe the requirements and rules valid for suppliers and contractors, taking care to bring to their attention the procedures concerning them.

The SSA also monitors the changes introduced in the SGSA through special procedures with which it defines activities to plan and monitor the processes of:

- design, industrialisation, purchase, installation, commissioning of new vehicles, plants, infrastructures;
- introduction of new substances and preparations;
- significant changes in processes and working methods.

Operational control documentation consists of numerous instructions, manuals, information and training files. Some of these are applicable at all Cornaglia Group sites, some are modified to suit the needs of each site, and some are site-specific.

Planned changes are kept under control, and the consequences of unintended changes are reviewed by taking action to mitigate any negative effects.

Similarly, the Cornaglia Group ensures that outsourced processes are kept under control or influence. Consistent with a life cycle perspective, the Organisation:

- establishes controls to ensure that its environmental and safety requirements are addressed in the design and development processes for the product/service, taking into account each stage of the life cycle;
- determines its own environmental and safety requirements in the procurement of products/services;
- communicates its relevant environmental and safety requirements to external suppliers, including contractors;
- considers the need to provide information on potential significant environmental impacts associated with the transport/delivery/use/end-of-life treatment/final disposal of its products/services.

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Documented information relating to operational control is reviewed if evidence emerges to demonstrate its inadequacy.

4.7 Emergency Preparedness and Response

Procedure **PSA-06 "Emergency Management"** describes the activities carried out by Cornaglia Group to manage the preparation and response to potential emergency situations.

Any possible emergency situation of environmental or health and safety nature in the workplace is analysed through the evaluation of environmental aspects and risk assessment, developed by the SSA in collaboration with the Managers of the concerned areas, according to the procedures PSA-01, PSA-05 and PSA-07, also taking into account the Context in which the Organization operates and the needs/expectations of the concerned Parties.

These analyses result in Emergency Plans that are drafted by the SSA, approved by the DST and disseminated to staff through information activities. The Emergency Plans also consider the possible effects of nearby facilities and interactions with them.

The plans are revised by the SSA, in agreement with the functions concerned, in the case of:

- Changes in the production process
- Changes in plant and buildings
- Changes in environmental technology
- Any accidents or emergencies that have occurred
- Results of drills carried out.

The Emergency Plans are periodically implemented (even in the absence of specific situations) in order to verify their effectiveness.

5. Monitoring, corrective action and performance evaluation

5.1 Monitoring and measurements

The purpose of this chapter is to define the criteria adopted to carry out the surveillance and, where deemed necessary, the measurements of parameters and characteristics related to the activity of the Cornaglia Group relevant to Environment and Safety, including the surveillance of mandatory compliance obligations. The SSA is responsible for organising surveillance operations. Operational surveillance activities and related records will be carried out by the personnel identified in the procedures and in the Surveillance Plan.

The methods for periodic monitoring of environmental impacts and risks are formalised in the Operational Control, Surveillance and Measurement Plan according to procedure **PSA-09 "Operational Control, Surveillance and Measurement Plan"**.

The Plan of Operational Controls, Surveillance and Measurements is kept up-to-date by the SSA, in collaboration with the Site Safety and Environment Manager (who is responsible for the schedule), when there are substantial changes to activities, products, business processes and new requirements.

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This table is distributed by the SSA to the bodies concerned who will record the outcome of the activities carried out according to the methods described in the table.

The SSA verifies at least quarterly the maintenance of compliance obligations through the programme in access "Cornaglia Deadlines", the Plan of Operational Controls, Surveillance and Measurements (with annexed Schedule) and records the results on the Plan itself.

During the audits, the SSA verifies compliance with the legal requirements applicable to the specific environmental aspects of the site and/or area and during the periodic Management Reviews it verifies operational compliance.

The satisfaction of other stakeholders (e.g. employees, suppliers, competent authorities) is also assessed using dedicated methodologies:

Suppliers - analysis of disputes

Competent authorities - analysis of disputes

Employees - dedicated questionnaires

Community - analysis of reports received.

Customer and Stakeholder satisfaction data are reviewed during the Management Review in order to define methods to increase the levels of satisfaction.

5.2 Analysis and evaluation of conformity

The purpose of this chapter is to define the methods for detecting non-conformities (NC) in the field of safety and the environment and for formalising the relative corrective and preventive actions, as foreseen by procedure **PSA-04 "Management of non-conformities and corrective and preventive actions"**.

The NC on safety and environment can be detected by the SSA and/or all the personnel of the Company Functions and can be reported by filling out the forms MSA-065_01 "Environmental reporting" and MSA-065_02 "Reporting safety SEWO" and by filling out the form MSA-040_01 "Emat - Smat" during the inspections carried out by the SSA in the production departments or periodically performed by the persons in charge in the departments to which they belong as provided for by the instruction ISTR015SA "Self-controls of departments".

Some elements that could lead to Non-Compliant situations are:

- Non-fulfilment of mandatory compliance obligations;
- Non-fulfilment of the requirements of the Safety and Environment Management System;
- Changes to the context in which the organisation operates;
- Potential situations that may produce safety risks and environmental impacts;
- Internal and external reports and communications from interested parties;
- Results of internal safety and environmental audits;
- Plant maintenance activities;
- Results of environmental monitoring (e.g. chemical analysis);
- Results of health surveillance and accident records.

The SSA reports the identified Non-Conformities in the MSA-014 "SSA Register" and, after assessing the seriousness of the problem, identifies the short and long term Corrective Actions in collaboration with the interested bodies and the plant management involved. These corrective actions are also reported directly on forms MSA-065_01 and MSA-065_02, specifying those responsible for

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implementation and the expected date of implementation, and a copy is sent to the relevant bodies and plant management involved.

All NC reporting forms are collected and filed by SSA, which also has the task of verifying that the Corrective Actions have been completed successfully and on time, and subsequently verifies the effectiveness of the actions carried out.

The closure of the Non-Conformities is recorded on the MSA-014 register and in the case of the forms MSA-065_01 and MSA-065_02 is attested by the signature on the form of the SSA, the DST and the persons responsible for the implementation.

In the hypothesis of recurrent NC, the SSA provides for the analysis of the causes, both technical and managerial, which have produced them in order to issue a suitable request for corrective and preventive actions.

5.3 Analysis and evaluation of compliance

All safety and environmental records are kept for the period determined by the competent Functions. The way in which these records are managed is as previously described in chapter 4.4 of this Manual.

5.4 SES audits

The Safety and Environmental Management System is periodically audited by the SSA, through qualified personnel, for the applicable parts of the System.

It is normally SSA to plan the audits through the form MSA-047 "Internal audit plan", to conduct and document the audits through the forms MSA-041-01 "Audit feedback form" and MSA-041-02 "Internal audit report", for one or more of the following reasons

- verification of the Safety and Environment Management System,
- verification of the effectiveness of the Corrective and Preventive Actions undertaken,
- verification of the correct management of environmental aspects and significant risk factors identified,
- verification of the company areas that have a significant environmental impact,
- verification of the legislative compliance of the site/production unit.

For conducting environmental audits, checklists customised to the area to be audited are used (MSA-041-01). At the end of the audit, an inspection report is drawn up by the SSA (MSA-041-02).

The planning of Internal Inspections is carried out taking into account the results of previous visits, the results of the Management Review, relevant changes to the company's product process, if the trend of performance indicators suggests the need.

The methods for planning, preparing and carrying out environmental audits are described in procedure **PSA-08 "Safety and environmental audits"**.

6 Management review

6.1 Management review

The purpose of this chapter is to define how the periodic Management Reviews are conducted.

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The responsibility for conducting the overall management review of all sites lies with the ADI in the Safety and Environment Committee (SES). As described in chapter 2.1, there are two ADIs in the organisation but it has been decided to carry out only one Corporate Management Review from 2020. The Safety and Environmental Management System is reviewed annually (or more frequently if deemed necessary) to ensure its compliance, adequacy and effectiveness over time according to UNI EN ISO 14001 and UNI ISO 45001.

In the review meetings, the SSA reports to the ADI, DST, SLE and Plant Managers on the following main issues:

- general considerations on the status of the Safety and Environment Management System,
- results of internal/external audits;
- results of audits carried out by Clients/External Bodies;
- assessment of compliance with requirements;
- review of any complaints or communications from interested third parties (private citizens, A.S.L., Supervisory Authorities, ...), the Competent Doctor and Workers' Safety Representatives;
- review of non-conformities, accidents and injuries;
- status of corrective and preventive actions;
- degree of achievement of objectives and targets through environmental indicators;
- changes in legislation/processes/technologies/substances;
- changes in Environmental Aspects, Context and Stakeholders' needs/expectations;
- adequacy of the Safety and Environmental Management System in relation to changes;
- improvement decisions/changes in policy/changes in the investment budget;
- progress of previous reviews.

In these meetings, DST, in cooperation with SSA, defines the priority activities aimed at the continuous improvement of the site's Safety and Environmental Management system performance.

In particular, the topics treated as input in the Management Reviews are:

1. Result of the actions deriving from the previous Review;
2. Any changes in the Management System and in the Environmental and Safety Policy (in relevant internal and external factors, stakeholders' needs and expectations, including compliance obligations, significant environmental aspects, risks and opportunities);
3. Degree of achievement of environmental and safety objectives, opportunities for continuous improvement;
4. Analysis of accidents occurred and trend of environmental indices;
5. The organisation's performance: preventive actions, non-conformities and corrective actions, monitoring and measurements, compliance obligations, audits;
6. Adequacy of resources, relevant communications from interested parties;

The output of the Reviews will include conclusions on the adequacy and effectiveness of the System, new safety/environmental objectives related to opportunities for continuous improvement and rescheduling of unmet objectives, opportunities to improve integration of the system with other business processes, any changes to the Management System and/or resources, and strategic decisions for the organisation.

Records of review minutes are kept by SSA.

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7 Improvement

7.1 Non-conformities, corrective and preventive actions

The Cornaglia Group identifies improvement opportunities considering the results obtained from the analysis of environmental performance, safety risk assessment, conformity assessment, internal audits and Management Reviews. The organisation implements any action necessary to achieve the expected results of its Safety and Environmental Management System. These actions include

- the correction, prevention or reduction of undesirable effects;
- improving the performance and effectiveness of the HSMS.

The concept of preventive action is based on understanding the organisation and its context (Chap. 1.2), in actions to address risks and opportunities (Chap. 3.1), and was previously dealt with in Chapter 5.2 as foreseen in procedure **PSA-04 "Management of non-conformities and corrective and preventive actions"**.

7.2 Continuous improvement

The Cornaglia Group continuously improves the suitability, adequacy and effectiveness of its SGSA taking into account the results of the analysis/evaluation, and the outputs of the Management Reviews to determine if there are needs/opportunities for improvement.

All records concerning the performance of the processes, the assessment of their effectiveness in terms of achieving objectives, and the analysis/assessment of risks and opportunities, are reviewed by ADI with the aim of promoting continuous improvement in the suitability, adequacy and effectiveness of its Management System. The evidence of this assessment and any proposals for improvement are recorded in the Management Review Minutes.

When improvement measures are decided upon, they are usually specified:

- general objective;
- actions to be undertaken;
- operational arrangements for each individual action;
- responsibility for the implementation of each action;
- arrangements, timing and responsibility for verification.

It is the responsibility of the manager of each individual area

- to present the decisions taken and the activities for which he/she is responsible to the respective collaborators, defining operational methods and responsibilities;
- monitoring the progress of improvement activities and promptly informing the SSA of any difficulties, delays, etc. in their implementation
- check that the set objectives are achieved efficiently and consistently with the company's reality and within the set timeframe.

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It is the responsibility of the ADI, in conjunction with the managers concerned, to carry out reviews of the progress of improvement activities at set intervals. These assessments are recorded and kept by the SSA.