



MSGI HSE SYSTEM MANAGEMENT MANUAL

according to standards

UNI EN ISO 14001:2015

UNI ISO 45001:2018

Rev. 21 of 11/04/2024



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20	29/09/2022	Update to eliminate references QUALITY - PED - ATEX	RSGSA	Employer
21	11/04/2024	Implementation of amendment 1 of 23/02/2024 of the UNI ISO 14001 and 45001 Standards	RSGSA	Employer



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0. PROCESS APPROACH AND RISK ASSESSMENT

Biffi Italia (hereinafter "the Company") has updated, redesigned and implemented its Integrated Management System, in compliance with the new standards mentioned on the cover and in the EHS PROCEDURES.

0.1. Generality

In redesigning and improving its Integrated Management System, the Company considered:

- Its ability to regularly provide products and services that meet applicable mandatory requirements;
- Its ability to prevent work-related injuries and illnesses to workers, provide safe and healthy workplaces and protect the environment by preventing or mitigating negative environmental impacts;
- The risks and opportunities associated with the internal and external context;
- The needs and expectations of stakeholders;
- The type of product and service offered;
- The complexity of the processes and their interactions;
- Staff skills;
- Its size and organizational structure.

0.2. Principles of the Integrated Management System

The Company's Integrated Management System is based on the following principles:

- Prevent or mitigate environmental impacts;
- Eliminate hazards and minimize risks;
- Leadership;
- Active participation of people;
- Process approach;
- Continuous improvement;
- Evidence-based decision-making;
- Relationship management.

0.3. Process approach

0.3.1. Generality

The Company has established a documented and active IMS, to ensure that environmental and health and safety aspects are always kept under control both from a legislative and operational point of view and to achieve continuous business improvement.

To correctly apply the System, the Company has:

- prepared an MSGI recalling the procedures of the SGI;
- identified the processes necessary for the SGI;
- established the sequences and interactions between the processes and through appropriate procedures the criteria and methods to ensure the effectiveness of their operation;
- implemented the SGI by applying documented procedures and instructions;
- Defined work instructions

- defined the necessary resources;
- measured, monitored, analyzed processes and implemented the necessary actions to achieve the expected results and continuous improvement.

Business processes have been analyzed from the point of view of safety in Chapter 1 of the DVR while environmental aspects are found in the environmental analysis. These documents are kept constantly updated, to allow us to operate with a view to process optimization, continuous improvement, risk management, monitoring of the entire process and identification of development and improvement opportunities.

0.3.2. PDCA

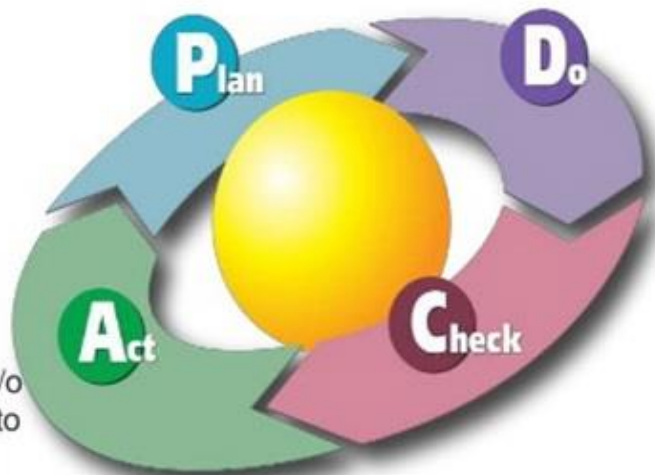
In the management of the SGI and particularly strategic processes, also in a Kaizen perspective (continuous improvement), the PDCA methodology, also known as "Deming Wheel", is used, which follows the following scheme:

P - Plan. Pianificazione.

D - Do. Esecuzione del programma, dapprima in contesti circoscritti.

C - Check. Test e controllo, studio e raccolta dei risultati e dei riscontri.

A - Act. Azione per rendere definitivo e/o migliorare il processo (estendere quanto testato dapprima in contesti circoscritti all'intera organizzazione).



0.3.3. RISK ASSESSMENT – Risk Based Thinking

The Company's SGI plans to identify and manage risks and opportunities related to processes, to identify and evaluate hazards that may affect health and safety and environmental conditions and the risks deriving from them, and to define the most appropriate preventive and protective measures, in order to eliminate or minimize risks.

0.3.4. RISK ASSESSMENT – Environment

The Company has chosen to use a methodology similar to GxP (Severity x Probability) for the definition and treatment of risk, defining a series of criteria for the severity of the probable risks identified, measured with a numerical value, illustrated in DR 208-Environment.

The resulting risk value is calculated using the product of the severity of the defined criteria, obtaining an R value.

If the resulting value of R is higher than the value established in DR 208-Environment, then the management defined for the potential risk is activated. Once enabled, the new condition is monitored, and the policy definition is updated.

0.3.5. Design risk analysis

Each product (valve actuator for the oil industry) is sold to the customer with a special use and maintenance manual. The manual indicates the environmental and safety risks potentially linked to the use of the machine. The risk related to actuators has been included in DR DR-64 Environmental Aspects Actuators.

0.3.6. RISK ASSESSMENT – Health and Safety

The DDL, and with the assistance of the RSPP, the collaboration of the MC and the prior consultation of the RLS, established and drafted the documents for the identification of hazards, for risk assessment and for the implementation of the necessary prevention, protection and control measures. In the analysis, the following were considered:

- ordinary and extraordinary activities;
- activities of staff who have access to the workplace (including suppliers and visitors);
- means and systems in the workplace supplied by BIFFI ITALIA or by third parties;
- product design.

The Company ensures that the results of these assessments and the effects of these controls are taken into account when defining health and safety objectives.

The Company documents and keeps this information up to date.

The methodology used for hazard identification and risk assessment shall ensure that the assessment:

- is defined with respect to purpose, nature and timing to ensure that it is preventive rather than reactive;
- provides the classification of risks and the identification of those to be eliminated or controlled, in the measures defined by the objectives and the business management programme;
- is consistent with existing work experience and risk control skills;
- provides insights into determining the requirements of vehicles and facilities, identifying training needs and/or developing operational controls;
- monitor the necessary actions to ensure the effectiveness and timeliness of their implementation.

All activities carried out in the settlement and those that the Company carries out directly outside the settlement (e.g. transport, customer service), as well as activities carried out by third parties in the company settlement and which may interfere with its activities (contractors) are analysed to identify the hazards present as well as the organisational and operational aspects that may significantly affect Occupational Health and Safety (in real or potential terms).

The analysis is coordinated by the RSPP, in collaboration with SPP and the entire company structure (managers, supervisors, workers), with the competent doctor and with external companies operating in the establishment or to which the staff of the BIFFI ITALIA Company goes.

Only and exclusively with regard to Title IV (temporary or mobile construction sites) of Legislative Decree 81/08, the Company has appointed, through a contract, an external specialized study to cover the figures of:

- Responsible for the works;

- Coordinator in the field of safety and health during the realization of the works;
- Safety and health coordinator during the design of the works.

As specified above, the risk assessment is preceded by the consultation, by the employer or by a person delegated by him, of the workers' safety representatives (RLS). Work processes are broken down into elementary phases, dangerous sources and situations are identified and risks assessed.

We also consider the occasional activities carried out in the settlement and external ones, as far as possible, over which the Company may have influence.

Periodic reports issued by the Works Manager allow Biffi Italia S.r.l. to maintain control over these activities.

The update of the risk assessment is carried out annually during the review and following possible events or situations that make it necessary (in this case within 30 days from the introduction of the change as required by Legislative Decree 81/2008).

In particular, the assessment shall be updated as a result of:

- changes in laws or regulations or voluntary agreements;
- modification of the elements of the activity carried out and / or products / services;
- results of audits and, where appropriate, policy changes;
- designs for new products or designs for new/modified machinery or plants or changes to the production layout or modifications of substances/preparations used. These projects involve prior consultation of the RSGSA/RQ, the RSP and the RLS.

For a better understanding please refer to **DR 208** Risk Management.

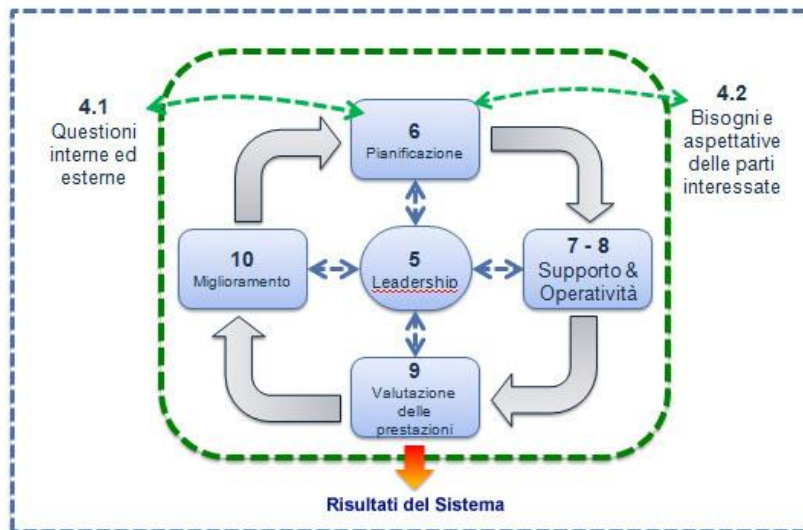
1. PURPOSE AND SCOPE OF THE GMS

The Company, with the desire to carry out its activities in the best way and in order to improve the environment in which it operates, has decided to adopt an Integrated Management System for the Environment and Safety in compliance with the UNI EN ISO 14001: 2015 and UNI ISO 45001: 2018 standards.

The SGI adopted by the Company establishes the management requirements that allow to formulate the company policy and establish objectives that allow to obtain the continuous improvement of business performance, as well as objectives that allow the organization to identify, manage business risks and improve its performance.

The IMS establishes, documents, implements, maintains and continuously improves the company management system, in accordance with the requirements of International Standards

The following diagram presents the fundamental processes on which the UNI EN ISO 14001: 2015 and UNI ISO 45001: 2018 standards are based:



This Manual and the IMS described in it apply to the activities of:

Design, production, sale and after-sales service of electric, pneumatic, hydraulic, gas-hydraulic and submarine actuators and related control systems

complying with the contractual requirements and the applicable mandatory ones.

This Manual has been created with a view to providing interested parties (internal and external to the Company) with a clear yet synthetic image of the company's approach to management for safety, the environment illustrating the salient aspects and the elements necessary to allow the reader to understand the ways in which the company has implemented and translated into operational terms the requirements of the ISO 14001 and ISO 45001 standards.

This document is one of the cornerstones, together with the Integrated Policy, of the commitment made towards all stakeholders (stakeholders).

The structure of this handbook is based on the voluntary rules applied.

These activities are carried out at the Fiorenzuola d'Arda site in the Province of Piacenza (Strada Biffi, 165).

2. NORMATIVE REFERENCES

The Company has developed its own integrated management system in agreement with:

- UNI ISO 14001: 2015 – Environmental management systems: requirements and guidance for use"
- UNI ISO 45001: 2018 standard – Management systems for health and safety at work – Requirements and guidance for use
- Amendment 1 of 23/02/2024 relating to the update of the UNI ISO reference standards for the UNI EN ISO 14001:2015 and UNI ISO 45001:2018 standards

The mandatory requirements related to environmental and safety aspects can be found in specific documents managed at the Environment and Safety Office.

3. TERMS, DEFINITIONS

For further information on EHS, please refer to the procedure of the HSE **PGI 08** management system relating to "Document Management".

Below are the identification codes of the functional bodies:

Acronym	Function
ACQ	Shopping
AF	After Sales
AGQ	Quality Management System Officer
AM	Atex Manager
AMM	Administration
ASGSA	Environmental Management System Officer, Safety
EC	Emergency Coordinator
.COM	Commercial
DDL	Employer
DS/RD	Plant Manager / Management Representative
EHS	Environment and Safety Office
ENG	Technical Office
HR	Human resources
.LOG	Logistics
MC	Competent doctor
MKT	Marketing
NC	Non-compliance
PMG	Product Manager
PMO	Project Management
PPP	Production Planning
PRD	Production
QA	Quality Office
RQ	Quality Management System Manager
RLS	Workers' Safety Representative
RSGSA	Responsible for the Environment and Safety Management System
RSP	Head of the Prevention and Protection Service
SAL	Sales
SIG	Integrated Management System
SPP	Prevention and Protection Service

The following abbreviations are recurrent in the text:

SIG	Integrated Management System
MSGI	Integrated Management System Manual
PGI	Integrated Management Procedure
IOA	Environmental Operating Instructions
I-SPP	Safety Operating Instructions
SW	Standard Work
DR	Registration documents

ISO 14001:2015 and ISO 45001:2018

The terms and definitions used are those defined by ISO 14001:2015 and ISO 45001:2018.

Outsource: *Entering into an agreement by which an external organization performs part of a function or process of the organization.*

Top management: *a person or group of people who, at the highest level, lead and control an organization.*

Environment: the context in which an organization operates, including air, water, soil, natural resources, flora, fauna, humans and their interrelationships.

Contractor: *external organization that provides services to the organization in accordance with agreed specifications, terms and conditions.*

Environmental Aspect – element of an organization's activity, product or service that can interact with the environment.

Audit: systematic, independent and documented process for obtaining audit evidence and assessing it objectively, in order to establish the extent to which audit criteria are met.

Corrective action: action to eliminate the cause of a detected non-compliance or other detected undesirable situations and to prevent their recurrence.

Life cycle: consecutive and interconnected phases of a product system, from the acquisition of raw materials or the generation of natural resources to final disposal.

Competence: ability to apply knowledge and skills to achieve the expected results.

Environmental condition: state or characteristic of the environment as determined at a set time in time.

Compliance: Fulfillment of a requirement.

Consultation: *seeking opinions before taking decisions.*

Effectiveness: *degree of implementation of planned activities and achievement of planned results.*

Environmental impact: modification of the environment, negative or beneficial, caused in whole or in part by the environmental aspects of an organization.

Accident: An event resulting from work or originating in the course of a job and which could cause or cause injury and illness.

Indicator: A measurable representation of the condition or status of operations, management, or conditions.

Documented information: *information that must be kept under control and maintained by an organization and the medium that contains it.*

Worker: *a person who performs work or work activities under the control of the organization;*

Injury and illness: negative effects on a person's physical, mental or cognitive condition.

Place of work: *place under the control of the organization, where a person needs to be or go for work reasons.*

Continuous Improvement: recurring activity to increase performance.

Measurement: The process of determining a value.

Monitoring: determination of the status of a system, a process, an activity;

Non-conformity: failure to meet a requirement

Compliance obligations: *The legal requirements that an organization must meet* and other requirements that an organization must or has chosen to meet.

Environmental objective: objective decided by the organization consistent with its environmental policy.

OSH target: target set by the organization to achieve specific results in line with OSH policy-

Objective: *result to be achieved.*

OSH opportunities, circumstances or sets of circumstances that may lead to improved OSH performance.

Organization: A person or group of persons with their own functions with responsibilities, authority and relationships to achieve their objectives.

Stakeholder : Person or organization that may have influence or may be influenced by a decision or activity (including Top Management);

participation: *involvement in decision-making;*

Performance: measurable results;

Hazard: source or situation with the potential for damage, in terms of injury or damage to health, damage to property, damage to the working environment or a combination of these.

Policy: the general orientations and guidelines of an organization expressed, formally expressed by the Top Management.

Environmental policy: *guidelines and guidelines of an organisation relating to environmental performance, as formally expressed by its top management.*

OSH policy: *Policy to prevent work-related injuries and illnesses for workers and to provide safe and healthy workplaces.*

Performance: measurable results-

OSH services: *performance relating to the effectiveness of injury and disease prevention for workers and the provision of safe and healthy workplaces.*

Environmental performance: *performance related to the management of environmental aspects.*

Pollution prevention: use of processes, practices, techniques, materials, products, services or energy sources to avoid, reduce or control the production, emission or discharge of any type of pollutant or waste, in order to reduce negative environmental impacts.

How to: *A specified way to perform a task or process.*

Process: the set of related or interacting activities that transform input elements into outputs.

Legal and other requirements: *legal requirements that an organization must meet and other requirements that an organization must or has chosen to meet.*

Requirement: *requirement or expectation that can be explicit, generally implicit. Or mandatory.*

Risks and opportunities: potential negative effects and potential positive effects.

OSHischium: a combination of the likelihood of one or more hazardous events or exposures occurring in relation to work and the severity of injuries and illnesses that may be caused by the event or exposures.



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Risk: Effect of uncertainty on objectives (expected results). The risk can be positive or negative;
Management system: set of related or interacting elements of an organization aimed at establishing policies, objectives and processes to achieve those objectives.

Environmental management system : part of the management system used to manage environmental aspects, fulfil compliance obligations and address risks and opportunities;

Management system for health and safety at work; OSH management system: management system or part of a management system used to achieve OSH policy.

4. ORGANIZATION CONTEXT

The specific data of the Company are as follows:

Name:	BIFFI ITALIA S.r.l.
Year of foundation:	1955
Main markets:	Foreign 80%, National 20%
Production:	Actuators and Control Systems
Share capital:	Euro 1.820.000
REA:	PC – 121628
VAT number and tax code:	01018580330
Employees	327 of which 294 Biffi employees and 33 temporary workers
classification ATECORI 2007	Code: 26.51.29 – production of other measure and regulation equipment, design instruments, electricity, gas, water and other liquids meters, precision analytical balances (disconnected parts and accessories included) Importance: P - primary Company Register Code: 28.14 – production of other taps and valves Importance: S - secondary Company Register Code: 28.12.00 – production of fluid-dynamic equipments (Scope: classification declared for IVA)

4.1. Relevant internal and external factors

The Company's activities can be carried out both in Italy and abroad.

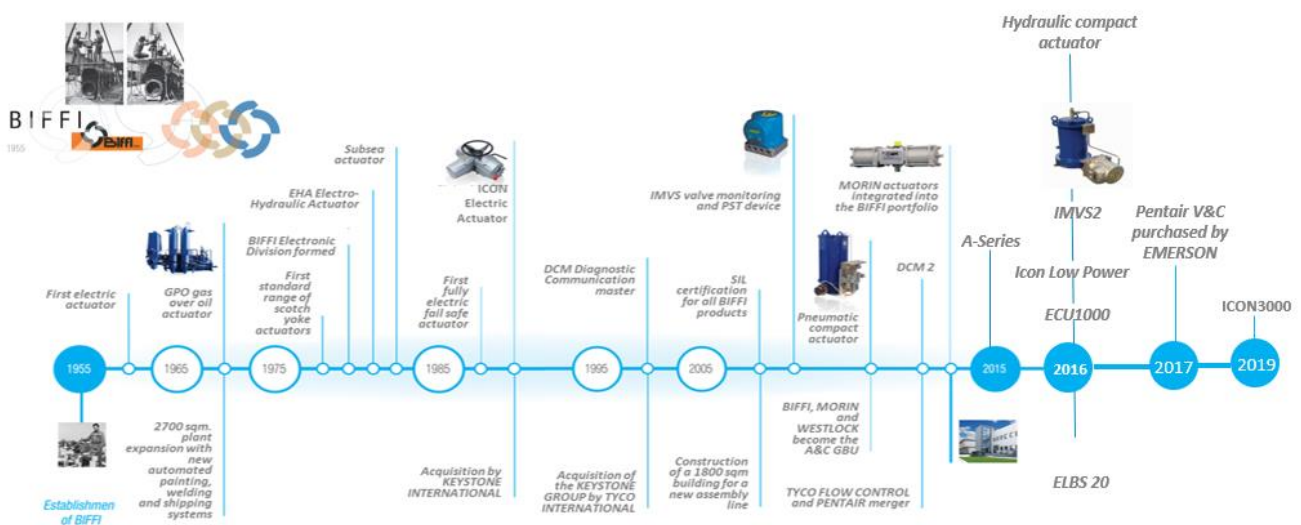
Biffi Italia S.r.l. is located at the exit of Fiorenzuola d'Arda on the road leading to Castell'Arquato, designs and manufactures electric, pneumatic, gas-hydraulic and submarine actuators necessary for the operation of various types of valves (butterfly, ball, etc.) for oil plants, gas pipelines, power and hydraulic power plants, chemical plants, aqueducts located all over the world and related control systems.

Biffi is an industry leader in the manufacture and design of customized actuators designed according to the requests and needs of various customers distributed throughout the international territory.

It was founded in 1955 as a family business by the Magni brothers who, strongly believing in their ideas and projects, created a company with solid foundations and a team of experienced, motivated and creative people so as to become attractive for several multinationals who later bought it.

The diagram below represents the various changes of ownership of the Company:

- it was owned by the Magni family until 1989;
- in 1989 it was sold to the American multinational Keystone International Inc.;
- in 1997 it was sold to the American multinational Tyco Flow Control division;
- from 01 October 2012 it became part of the Pentair Group Actuation & Controls division;
- since April 2017 it has become part of the Emerson group together with the entire valves and control and actuation and control segment of Pentair. Biffi has become part of the Actuation and Technologies division;
- since 2019 Biffi produces actuators under the Emerson, Bettis and Fisher brands.



After a first expansion in 1969, which involved moving to the current location, the premises were substantially enlarged in 1978.

A new building of 2,715 m² was built in 1996 to house an automated painting plant. In 2007 building 2 was expanded with a part of the shed that was used for the assembly and testing of large gas-hydraulic actuators and part to the new Shipping Department with the relative Administrative Billing Offices. Every year some production departments have been reorganized by applying Lean methodologies. In 2014 a new 3-storey building was built for Management, Marketing, Sales, PMO, Reception, etc. offices and the canteen was renovated.

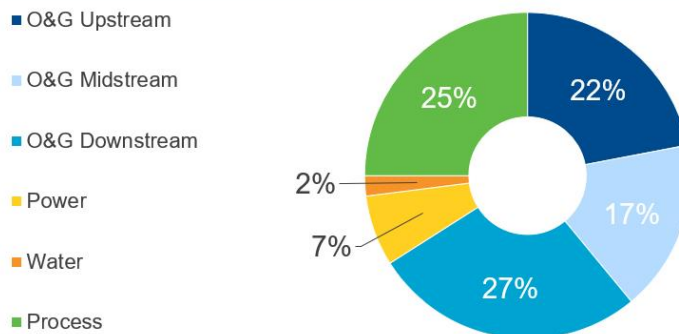
As of November 2023, the new photovoltaic system of about 900 Kwatt of power built on the new canopies of the employee parking lot (300 parking spaces) came into operation.

The company now has a total area of 63,988 m².

The Company has a modern plant equipped with cutting-edge equipment, where the Industrial and Application Engineering departments use a fully automated computer system for design, and the engineers of the Research and Development department constantly develop technical innovations that are such as to allow the Company to be a leading player for the sector thanks to the application and development of the latest technologies. The Company's Technical and Commercial Offices are always available to satisfy any customer request.

The Company's reference market is represented by the sectors listed below.

SALES BY INDUSTRY



The production cycle (active on average for 250 days / year) is organized through "Value Streams" and counts the following main operational phases:

- Acquisition of raw material;
- Warehouse;
- Production planning;
- Carpentry;
- Machining;
- Slobber;
- Washing;
- Primer painting;
- Assembly;
- Intermediate testing;
- Final painting;
- Finish;
- Final testing;
- Touches;
- Packaging;
- Shipping;

- Technical assistance at customer companies

The steps are extensively described in the Risk Assessment Document.

On the basis of these considerations, it can be considered that the internal and external factors taken into account are the following:

External factors:

- a) Cultural, social, legal, financial, technological, economic and market factors and environmental.
- b) Influence of new competitors, contractors and all kinds of suppliers.
- c) New technologies, laws and new knowledge about products and processes and their effect on occupational safety and health and environment.
- d) Relevant factors and trends related to the specific industry or sector.
- e) Relations with stakeholders and their perceptions.
- f) Influence of climate change on products and processes.

Internal factors:

- a) Governance, organization, roles and responsibilities.
- b) Policies, objectives and strategies.
- c) Resources, knowledge and skills (e.g. capital, time, human resources, processes and technologies).
- d) Introduction of new products and services.
- e) Relationships with the workforce, suppliers and contractors and outsourced suppliers.
- f) Working hours and conditions.

4.2. Stakeholder needs and expectations

Public Administration (Municipality / ASL / Local Authorities / Customs / INAIL / ARPA / VV.FF. / etc.): expect that rules, regulations and directives in force are met and respected, in legal, fiscal, environmental and safety and prevention terms.

Territory and Neighbourhood: they want the potential sources of pollution produced by the company (emissions into the atmosphere, noise pollution, etc.) to be minimized and not to affect the comfort and well-being linked to the quality of life.

Shareholders/owners: they want to maximize the business with a view to continuous sustainable development and improvement to achieve the performances defined in the budget and in the short, medium and long-term objectives. That is why, first of all, they decided to implement the SGI. Their interest in the SGI is related to the company's ability to meet the requirements and avoid fines or discover possibilities to save costs thanks to the improvements obtained through the SGI, proper planning and continuous improvement that allow, among other things, the fight and contrast of emergencies (environmental, health, natural disasters, safety, etc.).



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Customers: they want the delivery of products made by the Company not to be delayed due to defects, planning errors or unforeseen events such as natural disasters or accidents at work.

They want a sustainable product that meets safety standards and has a low environmental impact, based on the best available technologies.

Suppliers/partners: they want an adequate remuneration for the product/service provided, to be paid on time, to be able to carry out their product/service in a planned way with a delivery time appropriate to the required complexity, in order to limit planning errors or unforeseen events of majeure such as natural disasters or accidents at work, and with a precise and clear definition of agreed requirements and specifications. All this, with a view to partnership, growth and mutual business development in compliance with the legislation and with the lowest possible risk both for the environment and for safety at work.

Contractors: complete compliance with current regulations on Health and Safety in the Workplace and the Environment with a view to pursuing the prevention and protection of the health of workers also of their Company, the reduction and/or elimination of accidents at work, a safe working environment and the reduction of environmental impacts (e.g. containment of energy waste, emission reduction, waste reduction, etc.).

Processing suppliers c / third parties (painters, treatment makers, etc.): complete compliance with current regulations on Health and Safety in the Workplace, Environmental with a view to the pursuit of prevention and protection of the health of workers also of their Company, the reduction and / or elimination of accidents at work, occupational diseases, the environment in order to reduce environmental impacts (e.g. containment of energy waste, emission reduction, waste reduction, etc.).

Employees: Employees want to work in a company where they can be proud of their contribution, grow professionally and work in a planned manner without possible emergencies related to planning problems, delays in supplier deliveries and defectiveness/lack of materials, components and / or products. They want to spend their working hours in a healthy, safe, sustainable and environmentally friendly environment and work in synergy with their colleagues by establishing personal relationships based on respect, transparency and trust, achieving the objectives shared with the company.

Parent company and related Control Bodies: they wish to be sure of the application of the legislative obligations related to the specific country. It provides support on the basis of its own experience and that of the other companies in the group in order to raise awareness of the development and production of increasingly sustainable products by encouraging the use of new technologies with a lower environmental impact and increasingly safer from the point of view of safety. It requires the application of group rules to allow a homogeneous management of common aspects.

Workers' representatives, trade unions and employers' organizations: they wish to have all the information available about the obligations implemented by the company so as to be able to verify and make workers aware of the provisions of the legislation and other requests.

Visitors: they want the workplaces to which they have access, the equipment and in general the working environment guarantee everyone the best possible standard of health and safety and the environment for everyone.

Family members and relatives of workers: they want the workplace, equipment and in general the working environment to guarantee everyone the best possible standard with a view to prevention and continuous protection of workers, satisfaction and fulfillment of the workers themselves.

In addition, they want the potential sources of pollution produced by the company (emissions into the atmosphere, noise pollution, etc.) to be reduced to a minimum and not affect the comfort and well-being related to the quality of life of the workers and their families.

Industry associations, non-governmental organisations (NGOs), the media: they want to be made aware of all the information required in order to monitor the situation and provide up-to-date information to their interlocutors.

SB: compliance with regulations and maintenance of the measures necessary for compliance with Legislative Decree 231/2001.

EHS Certification Body (Tuv): fulfillment of all aspects required for the certification of the Company, complete compliance with current regulations on Health and Safety in the Workplace, maintenance and implementation of processes and procedures for the continuous improvement of certified standards.

Insurance Companies (FM Global): complete compliance with current regulations on fire, viability, anti-seismic, etc., complete compliance with the requirements of the Emerson Parent Company for previous aspects, complete compliance with the requirements and standards for the previous aspects of the Insurance Company itself.

Occupational Physician: complete compliance with current regulations on Health and Safety in the Workplace with a view to pursuing the prevention and protection of workers' health, the reduction and / or elimination of accidents at work, occupational diseases. Relationship of coordination and consultation in order to help ensure a healthy, safe, sustainable and environmentally friendly and to better pursue the health and safety of workers as a common goal

4.3. Scope

BIFFI ITALIA S.r.l. based in Fiorenzuola d'Arda, carries out design, production, sales and **after-sales service of actuators and related control systems** for the Oil & Gas, power, water & process sectors, taking into account the external and internal factors reported in point 4.1 and the requirements of the relevant interested parties reported in point 4.2.

For Health and Safety Management Systems UNI ISO 45001: 2018 the field of application corresponds to that just described.

For the Environmental Management System UNI EN ISO 14001:2015 the scope is as follows:

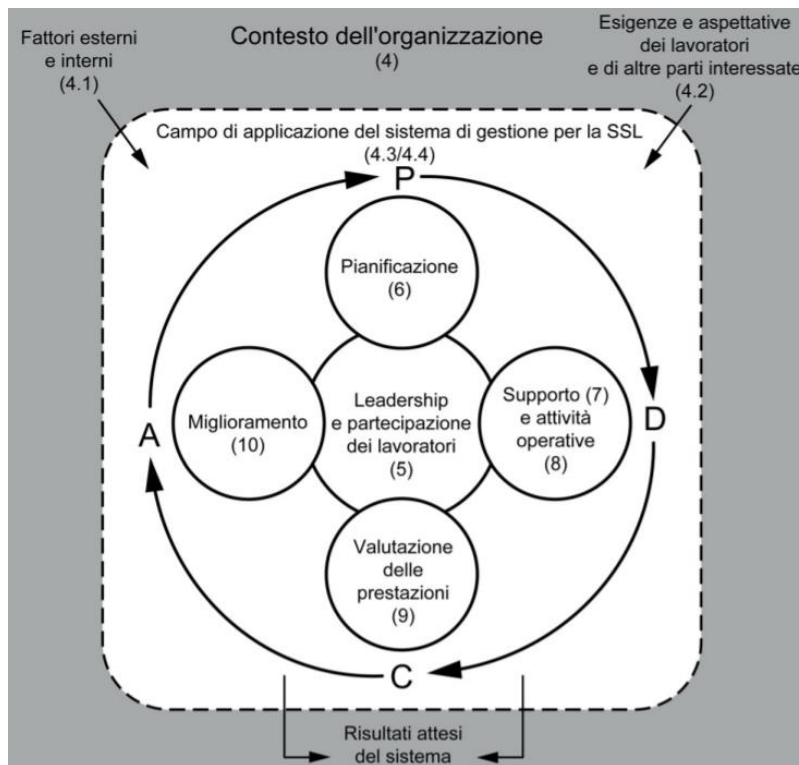
Design, production of actuators and related control systems.

The HSE Management System has been designed to meet all the requirements contained in the UNI EN ISO 14001: 2015 and ISO 45001: 2018 standards.

4.4. HSE Management System Requirements and related processes

The IMS put in place allows to identify the processes that impact on the functionality of the company, to establish the correct flow and their interaction, managing them through appropriate controls and indicators.

The interaction between the support processes for implementation and the support processes for general control and improvement is total, generally concerns all business processes and is set up as illustrated in the following flow.



The mapping of Biffi processes is represented in the **DVR**.

5. LEADERSHIP

The responsibilities associated with the following chapter of the MSGI are inferred from the responsibilities contained in the reference procedures.

The Company has chosen to act according to a working logic based on empowerment, since the management believes that a model based on a lean and horizontal structure is more effective in terms of staff motivation.

In order to ensure the efficient functioning of the IMS, the roles, responsibilities, tasks and mutual relationships of all personnel who direct, carry out and control activities that have an impact on the environment and the health and safety of workers are identified.



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The Management also identifies in the participation of workers a fundamental value for the maintenance of good or organizational or company level.

See the **Company Organization Chart**.

5.1. Leadership and Commitment

The fundamental values on which the work in the Company is based are the following:

- Provision of safe and healthy workplaces and activities to reduce occupational diseases and accidents at work;
- Integrate the requirements of the environmental management system within business processes;
- Loyalty, transparency and respect towards superiors, colleagues and employees, customers and internal and external suppliers;
- Ability to respond always, quickly and comprehensively to superiors, colleagues, employees, customers and internal and external suppliers;
- Operating methods in accordance with the procedures decided and the ability of the Company and individuals to assume their responsibilities;
- Willingness to promote development practices of managers and personnel (continuous training);
- Punctuality and reliability;
- Operating modes aimed at achieving objectives and continuous improvement (see **P-SGQ-01**).

The Company's management has chosen to keep the Integrated Management System active, using the PDCA methodology, and:

- planning activities and changes (Plan);
- introducing changes in limited areas and/or through pilot projects (DO);
- verifying the effectiveness of activities and changes through documented evidence (Check);
- extending successful large-scale activities and changes (Act).

The Management is constantly committed to developing, maintaining and continuously improving:

- its accountability for the effectiveness of the SGI;
- the integration of the SGI into the business and the definition of objectives in line with the company's strategies and its context;
- awareness promotion and risk-based thinking (see **P-SGQ-03**);
- the availability of the necessary technical and human resources;
- communication and dissemination at all levels of the importance of the requirements of the SGI;
- compliance with legislative compliance obligations.

It also undertakes to:

- ensure that the SGI achieves its objectives;
- engage, guide, and support people who contribute to the effectiveness of the SGI;
- provide support to other management roles in demonstrating their leadership.

5.1.1. Generality

With this in mind, the Company has set up a Management Committee (which provides the Company Functions with all the resources necessary for management, execution and verification of work, activating the appropriate communication processes within

the organization), implemented a corporate **War Room**, defined a skill matrix for each department, which is kept updated by HR, and acts to ensure that employees:

- receive timely and continuous information on organizational performance;
- can learn the appropriate knowledge and skills to contribute to organisational objectives;
- can make meaningful decisions based on documented evidence;
- can understand the meaning and impact of activities as a function of the results of the organization.

In addition, the management sets precise goals and sets objectives, committing itself to providing support and security to its collaborators personally involved in facing major organizational challenges such as daily problems, in a climate of openness also favorable to experimentation (KPIs).

5.2. Integrated Management System Policy

Top Management has defined the general principles on which the Integrated Management System Policy (Quality, Health and Safety, Environment) is based in accordance with the requirements set out in the Emerson Corporate Policy, which acts as a driving force for its organization, setting guidelines, objectives and commitments. The policy is appropriate and compatible with the strategic direction.

5.2.1. Policy Definition

Every year the Management, having set specific objectives during the review, assesses whether the contents of the policies are still adequate to achieve these objectives within the established times.

The SGI Policy and its objectives are the result of a careful and objective analysis of the internal situation, the results achieved and future objectives, as well as the external environment and the requests of the interested parties.

5.2.2. Communication of the Policy

The Policy is formalized by the management in the document "**QHSE Policy**", disseminated and illustrated to all Company staff during the company meeting at the beginning of the year, is available to all interested parties, affixed to the company bulletin board, saved in a folder shared with all company staff and published on the company website.

5.3. Roles, responsibilities and authority of the organization

For a system to work, those involved must be fully aware of their role. The Management ensures that the most relevant responsibilities and authorities are defined unequivocally and that everyone involved has a clear role. This is to optimize planning by ensuring that awareness is achievable through communication and training.

Each function head (or area) is responsible for his employees, plans their activities, and has complete visibility on the members of his team in terms of production and performance, through the evidence documented in the management system.

It also provides for the enhancement and professional growth of its collaborators, also on the indications of the Management, in order to pursue the development of knowledge and continuous improvement.

The company roles and main tasks are indicated in the company **organization chart**. In addition, the respective **Skill Matrixes (HR19-4A)** are defined for the functions involved in the product transformation process. The information is available in the Biffi Intranet company portal.

5.3.1. Environment

The DS with the assistance of the RSGSA has identified the significant environmental aspects and impacts, carrying out an Environmental Analysis. The conclusions of this Analysis are documented in specific documents recording the significance of environmental aspects, which constitute a reference point for the structuring of the Integrated Management System and for the definition of Company Objectives relating to the environment.

The Company, in order to control the interactions with the environment of its activities, prepares and maintains a procedure aimed at identifying, examining and evaluating the environmental aspects and effects of its activities.

Reference procedure PGI 16 "Identification and quantification of environmental aspects, hazards and occupational risk assessment".

With a view to continuous improvement, the Company through the Integrated Management System examines, evaluates and disseminates the environmental aspects and impacts concerning changes to processes, existing products and / or the introduction of new processes, products or services with the aim of updating, if necessary, the registration documents of the significance of environmental aspects and takes them into account in the determination of Company Objectives and Programs.

The environmental aspects related to the activities of the Suppliers, on which the Company can exert influence, are evaluated through specific questionnaires and on the basis of analysis of the same, through audits.

The environmental aspects related to the activities of the Contractors, on which the Company can exert influence, are monitored through specific cards that are delivered and analyzed in advance of the intervention that these companies must carry out in accordance with the **PGI 14-02** procedure "Discipline of contract works".

5.3.2. Safety

The **PGI16 procedure (Identification and Quantification of Environmental Aspects, Hazards and Occupational Risk Assessment)** describes the execution of risk assessment, also for the purpose of complying with Legislative Decree 81/2008. The planned evaluations are carried out by the RSPG involving the department managers and consulting the workers' safety representatives (RLS).

The prevention and protection measures and the conclusions of the evaluation proposed by the RSPG are approved by the Management; they shall subsequently be communicated to the functions responsible for their implementation.

5.4. Consultation and participation of workers

The company has integrated the consultation and participation tool into its decision-making processes.

5.4.1. Consultation

The workers elected workers' safety representatives (RLS) who are consulted regularly and where provided for on S&SL initiatives. In any case, the consultation of workers on all aspects essential to ensure the continuous improvement of the management system is guaranteed.

5.4.2. Worker participation

The Management intends to promote worker participation by encouraging internal communication with its senior managers and providing information about the nominal organization chart and ensuring availability for communication.

5.4.3. Sensitization

The Management intends to recruit workers, suppliers, visitors and all interested parties involved who are aware of the dangers to which they are subjected. Workers, suppliers, visitors and all interested parties must be aware of the dangers and must know how to identify those serious and imminent ones.

6. PLANNING (Plan – Do – Check – Act)

The Company has started the process of recognizing the risks and opportunities relevant to the purpose of the management system and defined actions, objectives and plans to address them.

6.1. Actions to address risks and opportunities

In recognising risks and opportunities, the organisation considered context and process inputs and the expectations of internal and external stakeholders, as well as applicable compliance obligations for environmental and occupational health and safety aspects. In addition, it has created, compiles and continuously manages the **DR 208** Risk Management, which provides useful data for the effective management of risks and opportunities in relation to different issues.

The modalities are described in point 0.3.3 of this Manual.

6.2. Objectives for the SGI and planning for their achievement

The specific objectives for the SGI are defined annually, during the review, by the Management and are quantified and measurable through specific indices, which allow to verify the level achieved and identify areas for improvement.

The objectives take into account the SGI Policy, the needs of the company and the context in which the Company operates, and are defined for the entire company organization and assigned to the various managers, as part of the relevant activities.

Safety and environmental planning is documented and responsive to the operational needs of the company to meet established requirements regarding environment and health and safety.

The Manual, Procedures, Instructions, data and reports are an integral part of the SGI planning and constitute the set of activities and plans that develop the processes to be carried out, the attribution of responsibilities and improvement activities, for the implementation of the IMS.

If in the presence of a specific contractual request and / or a product there are no documents already prepared, a specific plan would be issued, in compliance with all the requirements of the System, indicating the necessary additional requirements related to the planning of activities related to the specific product.

The reference procedure is **PG I-04**.

6.3. Change planning

To ensure that the changes that are necessary for the management system are planned, the possible consequences are considered and the availability of resources and the definition of roles and responsibilities are ensured, the proposals for changes to the management system are collected in the improvement plan, recorded in the Management review and managed as **a PDCA** project.

In the event that extraordinary changes to the management system are necessary (such as in the case of acquisitions of companies, introduction of new products or services, listing on the stock exchange, etc.), a specific PDCA project is implemented.

7. SUPPORT

The adequate resources to keep the IMS active and effective and allow its continuous improvement, have been determined and made available by the Management on the basis of what has been examined in the Management review and planned in the improvement plan, also for the possible management of specific contracts and / or projects, both in terms of human resources, and in logistical and / or procedural terms.

7.1. Resources

The Management undertakes to identify the resources necessary to maintain the effectiveness of the SGI and increase the satisfaction of interested parties in compliance with the requirements.

During the review phase, the Directorate assesses what resources are needed to achieve the objectives, and works towards their acquisition.

The staff is considered a very important resource, given the close connection between the quality of the system and the professionalism of the staff.

In this sense, staff motivation and individual awareness are an absolute priority for the Management both for the achievement of the objectives set and for the continuous improvement of the system's performance. Training and continuous updating are considered essential foundations to ensure the growth and motivation of staff.

The protection of the working environment, the natural environment, the prevention of accidents and the safety of workers during the performance of their activities are guaranteed by a periodic review of the obligations dictated by the rules adopted.

The Company pays particular attention to the management of resources and the working environment through:

- Assignment of clear and well-defined tasks;
- Involvement of staff in all company activities;
- Plant management and maintenance;
- Definition of safety and fire plans;
- Definition of emergency procedures
- Safety training of employees on the use of personal protective equipment;
- Identification and use of appropriate measures to encourage staff and involve them in improvement;
- Involvement of all staff so that they are aware of the importance of their activities and their contribution to achieving the objectives set by the Management.

With this in mind, it has defined and maintained the necessary infrastructure and working environment, to ensure the conformity of the product with the requirements.

The ordinary maintenance of infrastructures is intended to keep them efficient and avoid service interruptions due to breakages, or anomalies.



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If an infrastructure needs extraordinary interventions (due to failure, anomaly, lack of reliability, etc.) the manager contacts the Management and the internal maintenance service, indicating the need for action to solve the problem.

The definition of the periodicity of intervention, the methods of execution and verification of maintenance interventions for both infrastructures and work environments are the responsibility of the Management and the maintenance service.

The workplaces have been analysed in detail in the Environmental Analysis (for environmental aspects) and in the Company Risk Assessment Document (for aspects relating to health and safety at work).

It should also be noted that BIFFI ITALIA is attentive to energy consumption aspects, maintaining the objective of reducing them as a priority.

The Company's staff, working within the integrated management system, is competent and able to fulfill their duties, and is supported by adequate equipment and infrastructure, including the Company's buildings, hardware and software, means of transport.

The Company has determined what type of monitoring and measurement to undertake, proving that they are carried out with correct and reliable equipment, which is regularly calibrated and maintained, with the related documented information preserved. To this end, it organizes and manages the control, maintenance and calibration of monitoring and measurement equipment, for the purpose of objective credibility of the values read and to demonstrate the conformity of the product with the specified requirements.

This is detailed in the **PGI 10 - Monitoring Plan**.

The company planning, in addition to the analysis of availability and needs of materials and labor, includes the management of scheduled maintenance, to ensure that the production cycle, organized on several shifts, is continuous. For scheduled maintenance, and other work tools such as forklifts, means of transport, telecommunications and information system, everything is detailed in the **PGI 14-07** scheduled maintenance procedure.

The work environment is described under "Context of the organization" in this manual, in the Risk Assessment Document and all the factors of effectiveness, efficiency that may affect the Environment and Safety such as protective devices, ergonomics, heat, noise, lighting, hygiene, humidity, vibration, temperature, are monitored and managed by procedures and documented information of Health and Safety at work.

The needs related to organizational knowledge by employees are defined and planned in the company "**Skill matrix**".

The Company has defined responsibilities, criteria and methods for identifying the training and training needs of personnel who perform activities that have an influence on the environment and safety and provides for education and training by recording the execution and qualification of personnel assigned to particular tasks and annually

evaluating the performance of all personnel. Education and training activities are managed in the PGI **06 Staff Training** procedure.

In order to define hierarchical and functional relationships, the Company has an updated **organizational chart**.

7.2. Competence

To determine competency, the relevant criteria are established for each function that affects the IMS, in order to assess existing competency and determine future needs. If the criteria are not met, the Company carries out training plans aimed at filling the skills / knowledge gaps including hiring, training, training and job change programs.

Education and training activities are managed in the **PGI 06** Staff Training procedure.

7.3. Awareness

Staff must be made aware of the importance of their activity, their contribution to achieving the objectives of the SGI and the effectiveness of the management system and the consequent performance of the organization.

For this purpose, training programs and company meetings are periodically used.

7.4. Internal and external communication

For the Company, effective two-way communication is essential to have an efficient and performing management system and must concern what you want to communicate, but also what has been understood, in other words, what has been planned and what has been achieved.

Management, RSGSA and RSPG are committed to the dissemination and involvement of all staff in the management of the service itself, adopting appropriate tools such as:

- Regular meetings and training sessions with staff, recorded
- Disclosure of SGI policies and objectives;
- Disclosure of documentation (Procedures, Instructions, Standard Work);
- Written communications;
- Placing of projects, EHS performance indicators, PDCA plans etc. within the War Room;
- Biffi Magazine.

The management criteria relating to the communication activity are described in **PGI-07 Internal and external communication**.

7.5. Documented information

The Company has expressed the need to maintain or maintain documented information to concretize, clarify and demonstrate the fact that the SGI is up-to-date and effective.

To this end, it has kept active its Integrated Management System Manual and all existing documentation, also integrating it with other documented information, including the data of the management system.

The document structure of the SGI has been conformed to the operational reality of the Company and therefore includes those documents necessary to ensure the effective functioning and control of the processes.

The document structure of the Integrated Management System (IMS) is shown in the following figure:



The documents of the integrated management system are divided into:

- Integrated management policy
- Integrated Management System Manual;
- Procedures (PGI);
- Operating instructions (I-SPP, IOA, SW);
- Forms (Mod.), registrations (DR);
- Documents of external origin (laws, regulations);
- Data and evidence of the management information system.

The documentation is kept under control according to the procedures indicated in **the PGI 08 – Documentation Management** procedure. The documents, approved by the Management, are managed electronically on a company server. The communication to the staff, at the time of publication and / or modification of the documents is made by e-mail.

7.5.1. SGI Manual

The manual is the main document to describe or recall topics such as:

- the Biffi Integrated Policy and Corporate Emerson Policy;
- the organizational structure of the company;
- the responsibilities attributed to the different organizational positions;
- the identification of processes and the description of their interactions;
- the recall of management system procedures;
- any definitions of the specific terms used.

The responsibility for the development of the contents of the SGI Manual belongs to the Management together with the process managers, this to ensure credibility and effectiveness in their application.

RSGSA and RSPP have a fundamental role in the elaboration of the Manual, making use of the collaboration of all the aforementioned functions to ensure that they comply with the requirements of the reference legislation, the contractual aspects and the Company's policy.

Copies of the Handbook may be distributed to all relevant business functions when required.

RSGSA manages the distribution of copies of the Manual or its revised sections.

7.5.2. Documents and data

This section describes the measures that the Company has taken to keep under control the documents and data considered fundamental for the management of the IMS, including, as far as applicable, also documents from outside (standards, mandatory laws, requests for interested parties, etc.).

Before issuance, the documents and/or data of the SGI are verified, approved and signed by authorized personnel, for the purpose of their adequacy, becoming operational following the approval by signature, the Specific Manager and the Management.

Any modification and/or revision to the documentation follows the same procedure as the original issue.

7.5.3. Controlling Documented Information

Documents and records relevant to the IMS, with which it is possible to assess the appropriateness of implementing interventions for improvement, are identified, collected and archived so as to demonstrate the effective application and achievement of the objectives.

The recordings, whether they are general or specific documents, are cataloged in such a way as to be quickly traceable, also allowing the correlation between the registrations themselves and the product and / or activity to which they refer.

All documentation is stored on the company server and / or in the management application system.

The details are defined in Procedure **PGI 08 – Document Management**.

8. OPERATIONAL ACTIVITIES

With regard to safety, please refer to chapter 1 of the DVR while as regards the environment please refer to the environmental analysis.

The organization manages business processes (operations and activities), which present significant environmental aspects and health and safety risks to be kept under control,

so that they are carried out under controlled conditions. This means ensuring that processes are carried out in accordance with:

- the reference standards (whether they are legal or internal rules);
- corporate policy and objectives.

8.1. Operational planning and control

The elements that determine and control the process objectively are:

- documented procedures or instructions, which define the various phases of the production process;
- training of production and control personnel on the process and equipment to be used;
- monitoring and control of process parameters to ensure that the specified requirements are met;
- definition of the conditions to keep under control, in the manner and time defined, the process parameters and the characteristics of the product establishing where and how to carry out the surveys, measurements, etc.;
- identification of limits and/or tolerances within which to maintain process regulation parameters;
- ensuring that corrective actions and related approvals are implemented in the manner and within the defined timeframe;
- methodical updating of any changes to the documentation in close correlation with the evolution of the product and/or technologies;
- issuance of corrective actions whose results, statistically consolidated, allow to implement instructions and / or procedures that improve the reliability of the process and therefore of the product.

With regard to safety, using the information deducible from the initial analysis, the RSPP with the collaboration of the functions responsible for the various processes identifies:

- risks that make it necessary to apply risk control procedures;
- significant environmental aspects that without a control procedure may not be carried out under controlled conditions.

Once the phases or processes to be controlled have been identified, the managers of the same processes, with the collaboration of the RSGSA, carry out specific operating instructions for health and safety and environmental aspects. In this case it is possible to refer to existing operating manuals of machines and plants.

These operating instructions shall also include a description of the actions to be taken in the event of an emergency.

8.1.1. Design

The technical department takes into account all possible factors related to the life cycle of the product, therefore in the design phase of the actuator it considers information on the potential significant environmental impacts related to use, end-of-life treatment and final disposal.

8.1.2. Transport or delivery

Transport and delivery are handled from the warehouse on the basis of the indications received from the planning.

8.1.3. Supplier management (outsourcing)

The purchasing office manages the purchasing activities from suppliers of environmentally important products and/or services (for example: waste managers) and S&SL as defined in the PGI-02 procedure (Supplier Management Procedure) and PGI-16 (Identification and quantification of environmental aspects, hazards and occupational risk assessment).

Suppliers "critical" from an environmental and safety point of view, in particular outsourcing activities (e.g. painting, surface treatments) are qualified and kept under control. The ASGSA/RSPG sends each supplier a questionnaire to verify the main regulatory requirements and the presence of any certifications.

8.1.4. Contractors

The contractors who carry out activities in the production unit are managed according to the **PGI 14-02** procedure - **Contract Work Procedure**, under the responsibility of the acquired office. In the control of these companies, information and instructions of S&SL and environmental relevant to the activities carried out are communicated, in order to ensure that they apply the prevention and protection measures necessary to limit risks and to ensure adequate coordination with other processes carried out.

8.1.5. Waste

The waste generated by office activities is collected by Company employees in a separate way. For this collection, special containers have been made available on the basis of the waste to be contained. These types of waste are collected separately by the employees of the cleaning company at the end of the working day (or as needed) and are delivered to the municipal collection service on the days set by it.

The management and types of waste generated by the Production process and other supporting activities are described in **IOA-GR-01 (Waste Management)**.

8.1.6. Chemical agents (substances and preparations)

The management of hazardous chemical agents is carried out in accordance with **ISPP-47** (Management of dangerous substances and preparations) which provides for the carrying out of an assessment of environmental aspects and risks of health and safety at work, before their use in the company, to the **PGI-14-06 (Acceptance of substances and preparations)**, DR-02 – Substances and Preparations Acceptance Form, to **PGI-14-06-01** – Communication Hazard of Chemical Agents.

When necessary, specific operating instructions for the use of chemicals are prepared by the RSPG, with the assistance of the function managers.

8.1.7. Operation of machines and plants

The equipment, machines and plants present at the company's headquarters are equipped with CE marking and suitable protections to eliminate and reduce the risks of injury that may derive from the use of the same.

There are also non-CE marked machines that are managed in accordance with current regulations.

The choice of equipment/machines/plants present at the workplace was made by the Management according to the specific conditions, environmental risks, as well as the intrinsic risks of the machine.

The installation of the same took place in accordance with the manufacturer's instructions and on all of them suitable ordinary and extraordinary maintenance will be carried out in accordance with all the schedules included in the CLM maintenance software.

The RSPD and the HR Manager guarantee the information, education and training of workers on the use of equipment / machines and plants.

In addition, they will verify that workers comply with the obligations laid down for the use of the machines, making sure that they participate in information, training and training programs in the use of the machines and that they do not remove the protections present on the machines on their own initiative, reporting, if necessary, the presence of malfunctions to the Supervisor.

8.1.8. Maintenance

The Resp. Manutenzione manages and guarantees scheduled and on-call maintenance interventions.

8.1.9. Emissions

With regard to emissions into the atmosphere, please refer to the content of the Authorization - AUA - issued by the Province of competence and to the sampling carried out for the various emission chimneys.

8.1.10. Water resources

The Company's water supply sources are drinking water and a duly authorized private two-column well. More details on water consumption are available in the initial Environmental Analysis and in DR-106 – Energy & Waste.

8.1.11. Wastewater

Biffi has only domestic wastewater, industrial wastewater is collected in dedicated tanks and tanks that are then characterized and disposed of as waste in accordance with current regulations.

The domestic wastewater collection and conveyance system and the monitoring of water discharge data is described in the Initial Environmental Analysis and in DR-106 – Energy & Waste.

8.1.12. Change Management

Each function manager communicates to the RSP/ EHS Manager changes to business processes (or related environmental aspects or risks of S&SL), in order to update the information entered in the initial analysis. In this regard, please refer to the specific procedures.

Every year the RSP verifies the state of adequacy of the assessments, with the collaboration of the RLS.

The RLS, as part of its activity, may request changes or additions to the risk assessment and to the prevention and protection measures envisaged.

8.2. Emergency preparedness and response

With regard to operational and emergency response controls in terms of environment and safety, specific Procedures are used, namely PGI 09 - Operational control and emergency management and PGI 14-01 Emergency and Evacuation Plan, **PGI 14-08** - Personnel Risk Management Procedure on Away, **I-SSP-40** - Safety Operational Plan for the Management of Service activities carried out by technicians at Companies Customers and related Operating Instructions relating to Emergency Management.

9. PERFORMANCE EVALUATION

The company has established rules to plan the monitoring, measurement, analysis and improvement activities necessary to demonstrate product compliance, ensure the compliance of the IMS and continuously improve its effectiveness.

The applicable methods and indicators have been identified for these activities and are examined during the review phase.

9.1. Monitoring, measurement, analysis and evaluation

Monitoring, measurement, analysis and evaluation are necessary to provide evidence of the ability of processes to achieve the objectives set, and of compliance with product delivery specifications and for the continuous improvement process.

Therefore, the following are defined:

- The significant variables of the process (indicators, monitored on DB);
- The definition of the control system (frequency, responsible);
- The values of the reference conditions and acceptance criteria;
- The records and data used to provide evidence of such monitoring activities.

If results are not achieved, the necessary corrective action shall be taken.

The results of the monitoring and measurements are summarised in the Management Review Report (and its annexes), examined in the periodic meetings.

Health and safety and environmental measurements relate to CN, accidents, occupational diseases, accidents and assessment of compliance with requirements, including legislative requirements: please refer to PGI 10 - Monitoring Plan and **PGI-11_Gestione_NC-AC**.

9.1.1. Generality

The Company believes that monitoring the performance of environment and safety is one of the objectives to be achieved and for this reason, it constantly measures and analyzes it.

9.1.2. Conformity assessment

The QA and Management function, as part of the Management Review, define the company indices that, properly calculated and monitored, allow to assess how the company meets its compliance status.

To define the parameters that contribute to the satisfaction of corporate compliance, the following aspects are defined:

- Frequency of evaluation;
- product conformity;
- any action to be taken for adjustments;
- periodically monitor the achievement and maintenance of such adjustments.

The assessment of legislative compliance on environment and safety is ensured in accordance with **PGI 03** - Management of legal requirements.

9.2. Internal audit

The Company carries out scheduled internal audits in order to monitor the IMS, to verify that it is implemented in accordance with the reference standards and company policy, as well as being effectively implemented and kept updated to achieve the objectives defined by the Management.

A program of Audits is planned that takes into account the status and importance of the activities towards the Environment and Company Risks (health and safety at work), as well as the results of previous Audits.

The RSPS plans internal audits according to the criticality of the company areas, the anomalies found in the area, any complaints received from interested parties. All company functions are however audited at least once a year. To conduct the audit, the audit manager can use "Feedback Lists" that allow not to omit any verification point and record the objective evidence found. The duly completed "Feedback List", or the final report, are signed by the participants in the audit (evaluators and evaluated) to accept the results of the audit.

The criteria, extent, frequency and methods of the Audits are established. The results of the audits are documented through special records that are communicated to the audited functions. Appropriate corrective action shall be promptly taken in accordance with **PGI 12** Internal Audits in response to the identified deficiencies.

The implementation and effectiveness of the actions undertaken is ascertained in subsequent audits and duly recorded. The choice of the Evaluators and the conduct of the Audits ensure the objectivity and impartiality of the audit process. Evaluators do not carry out Audits on their work.

9.3. Management review

The Management periodically reviews the IMS to ensure its suitability, adequacy and effectiveness over time.

The following functions participate in the Review:

- Employer
- Operations Manager
- The Head of the S.P.P. – RSGSA – Health Safety and Environment Management Systems Officer
- EHS, Maintenance & Facility Manager – ASGSA – Head of Health and Safety and Environment Management Systems
- RLS
- Competent Doctor
- HR Manager
- ASPP – ASGSA

9.3.1. Generality

The review also assesses the need for changes in the organisation's system, including policy and objectives. The SGI shall, as a rule, be reviewed annually (at the end of the tax year). The periodicity is lower in case of significant changes to the SGI or in case of system inefficiency.

9.3.2. Input to the management review

During the Review, the following elements are examined:

- actions following previous reviews by management;
- changes in internal and external factors, in the needs and expectations of stakeholders, in their significant environmental aspects and in risks and opportunities;
- the degree of achievement of objectives and targets;
- performance monitoring;
- non-conformities including accidents, injuries;
- the status of corrective actions;
- recommendations for improvement;
- the circumstances resulting from changes, including changes to legal requirements and any requirements entered into by the Company;
- the results of internal audits;
- consultation and participation of workers;
- risks and opportunities;
- the adequacy of resources (internal staff, machines and equipment, consultants, etc.) ;
- communications from interested parties;
- opportunities for continuous improvement.

The review shall include verification of the overall effectiveness of the SGI with regard to equipment intended for use in explosive atmospheres.

9.3.3. Management review output

Outputs include decisions on:

- Adequacy, adequacy and effectiveness of the integrated management system;
- Opportunities for continuous improvement;
- Changes to the integrated management system;
- Necessary resources;
- Necessary actions;
- Opportunities to integrate the business management system with other business processes;
- Implication for the strategic directions of the organization.

The object of the Review is formalized in a special **RDIR** document whose contents summarize the participants, the input data considered, the topics covered and the improvement actions decided that this document formalizes.

The review document and the improvement objectives are presented in a meeting between the Management and the functions concerned in order to explain its contents. During this meeting, changes to the objectives may be made provided that they are approved by the Management.

The results of the review are communicated to the workers through their SGMs.

The RDIR Review document is part of the documented evidence and records of the system.

10.IMPROVEMENT

The process of continuous improvement is guaranteed by the review of the Management, which takes place at least annually. The reference procedure is **PGI 13 - Management Review**.

10.1. Generality

The continuous improvement process is based on the improvement objectives assigned to the Company Functions by the Management during the review of the IMS.

10.2. Non-conformities, incidents and corrective and preventive actions

In the event that situations that do not comply with the SGI are detected at any stage of the production process and on the basis of controls, the provisions of the **PGI 11 - Non-Conformity** procedure are implemented.

The company functions, within whose competence the non-compliance is detected, are responsible for:

- define the modalities for resolving the non-compliance;
- verify the implementation of the resolution;
- analyze anomaly data to identify the causes of non-conformities;
- propose possible corrective and preventive actions of more general impact.

The non-conformities detected are kept for statistical purposes to implement corrective and preventive actions aimed at the continuous improvement of company environmental performance.

Corrective actions are taken to eliminate the causes of existing non-conformities, defects or other unwanted situations in order to prevent their recurrence.

The responsibilities and modalities of implementation of corrective actions are described in detail in **PGI 11**.

These procedures shall include:

- the review of non-conformities;
- the search for the causes that led to the non-conformities on the SGI, including through the involvement of workers and stakeholders,
- the definition of the corrective actions necessary to eliminate the causes of non-conformities and appropriate to the importance of the problems and commensurate with the relative risks;
- the implementation of corrective actions;
- the recording of the results and effectiveness of the actions taken and the possible updating of company procedures for changes made to the SGI or risk assessment.
- the review of the results of corrective actions and information to the Management (input for the review of the IMS).

The documentation concerning the corrective actions implemented is kept in accordance with the reference procedure.

10.3. Continuous improvement

The continuous improvement of the Company is born at a strategic and daily level, through the tools highlighted below in the table.

Type of improvement	Service Tools
Strategic	Integrated policy, objectives and process indicators
Daily	Corrective actions, closure of non-conformities, monitoring of process results, personal training, monitoring and measuring satisfaction, suggestions from staff and users, internal inspection visits
Project/Modification Plans	Management of improvement projects based on PDCA methodology (Plan, Do, Check, Act).



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ANNEX 1: Correspondences with UNI EN ISO 9001, UNI EN ISO 14001, ISO 45001:2018 and ISO/IEC 80079-34

ISO/IEC 80079-34 (Chapter 7)		ISO 9001:2015		ISO 14001:2015		ISO 45001:2018		SGI Manual		SGI Procedures
		0	INTRODUCTION	0	INTRODUCTION	0	INTRODUCTION	0	PROCESS APPROACH AND RISK ASSESSMENT	
1	Purpose and scope of the quality management system	1	PURPOSE AND SCOPE OF THE QUALITY MANAGEMENT SYSTEM	1	PURPOSE AND SCOPE	1	PURPOSE AND SCOPE	1	PURPOSE AND SCOPE OF THE II	
2	Regulatory references of the quality management system	2	REGULATORY REFERENCES OF THE QUALITY MANAGEMENT SYSTEM	2	NORMATIVE REFERENCES	2	NORMATIVE REFERENCES	2	NORMATIVE REFERENCES	
3	Terms and definitions used	3	TERMS AND DEFINITIONS	3	TERMS AND DEFINITIONS	3	TERMS AND DEFINITIONS	3	TERMS, DEFINITIONS	
4	Quality Management System	4	ORGANIZATION CONTEXT	4	ORGANIZATION CONTEXT	4	ORGANIZATION CONTEXT	4	ORGANIZATION CONTEXT	
		4.1	Understand the organization and its context	4.1	Understand the organization and its context	4.1	Understand the organization and its context	4.1	Relevant internal and external factors	
		4.2	Understand the needs and expectations of Stakeholders	4.2	Understand the needs and expectations of Stakeholders	4.2	Understand the needs and expectations of	4.2	Stakeholder needs and expectations	



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ISO/IEC 80079-34 (Chapter 7)		ISO 9001:2015		ISO 14001:2015		ISO 45001:2018		SGI Manual		SGI Procedures
							workers and other stakeholders			
		4.3	Determine the scope of the quality management system	4.3	Determine the scope of the environmental management system	4.3	Determine the scope of the OSH management system	4.3	Scope	
4.1	Quality management system structure	4.4	Quality management system and related processes	4.4	Environmental Management System	4.4	OSH Management System	4.4	SGI requirements and related processes	
		5	LEADERSHIP	5	LEADERSHIP	5	LEADERSHIP	5	LEADERSHIP	
5.2	Focused customer care	5.1	Leadership and commitment	5.1	Leadership and commitment	5.1	Leadership and commitment	5.1	Leadership and commitment	
5.3	Quality Policy	5.2	Politics	5.2	Environmental policy	5.2	OSH Policy	5.2	SGI Policy PGI01	PGI-01
5 5.1	Responsibilities of the Management	5.3	Roles, responsibilities and authority in the organization	5.3	Roles, responsibilities and authority in the organization	5.3	Roles, responsibilities and authority in the organization	5.3	Roles, responsibilities and authority of the organization	PGI-05
		-	-	-	-	5.4	Consultation and participation of workers	5.4	Consultation and participation of workers	PGI-07
5.4	Planning	6	PLANNING	6	PLANNING	6	PLANNING	6	PLANNING (plan-do-check-act)	



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ISO/IEC 80079-34 (Chapter 7)		ISO 9001:2015		ISO 14001:2015		ISO 45001:2018		SGI Manual		SGI Procedures
		6.1	Actions to address risks and opportunities	6.1	Actions to address risks and opportunities	6.1	Actions to address risks and opportunities	6.1	Actions to address risks and opportunities	PGI-03
5.4.1	Quality Objectives	6.2	Quality objectives and planning for their achievement	6.2	Environmental objectives and planning for their achievement	6.2	OSH objectives and planning for their achievement	6.2	Objectives for the SGI and planning for their achievement	PGI-10 PGI-30
5.4.2	Quality Management System Planning	6.3	Change planning							
		7	SUPPORT	7	SUPPORT	7	SUPPORT	7	SUPPORT	
6 6.1 6.2 6.3 6.4	Asset Management	7.1	Resources	7.1	Resources	7.1	Resources	7.1	Resources	PGI-04 PGI-06
6.2.2	Skills, training and awareness	7.2	Competence	7.2	Competence	7.2	Competence	7.2	Competence	PGI-06
		7.3	Awareness	7.3	Awareness	7.3	Awareness	7.3	Awareness	PGI-06
5.5.3	Internal communication	7.4	Communication	7.4	Communication	7.4	Communication	7.4	Internal and external communication	PGI-07
4.2	Documentation requirements	7.5	Documented information	7.5	Documented information	7.5	Documented information	7.5	Documented information	PGI-08



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ISO/IEC 80079-34 (Chapter 7)		ISO 9001:2015		ISO 14001:2015		ISO 45001:2018		SGI Manual		SGI Procedures
4.2.1	List of documents that make up the Quality Management System									
4.2.2	Quality Manual									
4.2.3	Keeping documents under control									
4.2.4	Keeping records under control									
7	Realization of the product	8	OPERATIONAL ACTIVITIES	8	OPERATIONAL ACTIVITIES	8	OPERATIONAL ACTIVITIES	8	OPERATIONAL ACTIVITIES	
7.1	Product Realization Planning	8.1	Operational planning and control	8.1	Operational planning and control	8.1	Operational planning and control	8.1	Operational planning and control	PGI-02 PGI-09 PGI-16
				8.2	Emergency preparedness and response	8.2	Emergency preparedness and response	8.2	Emergency preparedness and response	PGI-09 PGI-14
7.2	Customer Processes	8.2	Requirements for products and services					8.3	Requirements for products and services	



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ISO/IEC 80079-34 (Chapter 7)		ISO 9001:2015		ISO 14001:2015		ISO 45001:2018		SGI Manual		SGI Procedures
		8.3	Design and development of products and services					8.4	Design and development of products and services	
7.4	Procurement process	8.4	Control of processes, products and services provided from outside					8.5	Control of processes, products and services provided from outside	
7.5 7.6	Production and service delivery Control of monitoring and measuring devices	8.5	Production and provision of services					8.6	Production and provision of services	
		8.6	Release of products and services					8.7	Release of products and services	
8.3	Keeping the non-compliant product under control	8.7	Checking non-compliant outputs					8.8	Checking non-compliant outputs	
8 8.1	Measurement, analysis and improvement	9	PERFORMANCE EVALUATION	9	PERFORMANCE EVALUATION	9	PERFORMANCE EVALUATION	9	PERFORMANCE EVALUATION	
8.2 8.4	Monitoring and measurement Data analysis	9.1	Monitoring, measurement, analysis and evaluation	9.1	Monitoring, measurement, analysis and evaluation	9.1	Monitoring, measurement, analysis and evaluation	9.1	Monitoring, measurement, analysis and evaluation	PGI-10



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ISO/IEC 80079-34 (Chapter 7)		ISO 9001:2015		ISO 14001:2015		ISO 45001:2018		SGI Manual		SGI Procedures
		9.2	Internal audit	9.2	Internal audit	9.2	Internal audit	9.2	Internal audit	PGI-12
5.6	Review of the organisation	9.3	Management review	9.3	Management review	9.3	Management review	9.3	Management review	PGI-13
8.5	Improvement	10	IMPROVEMENT	10	IMPROVEMENT	10	IMPROVEMENT	10	IMPROVEMENT	
		10.1	Generality	10.1	Generality	10.1	Generality	10.1	Generality	
8.5.2 8.5.3	Corrective Preventive Actions	10.2	Non-conformities and corrective actions	10.2	Accidents, non-conformities and corrective actions	10.2	Non-conformities and corrective actions	10.2	Non-conformities, incidents and corrective actions	PGI-11 PGI-15
8.5.1	Continuous improvement	10.3	Continuous improvement	10.3	Continuous improvement	10.3	Continuous improvement	10.3	Continuous improvement	PGI-15