



HEALTH AND SAFETY POLICY

Issue date: 30/09/2025 – Revision: 01

Company: Prochimica Novarese S.p.A.

Sites: PN1 – Via Marconi 21, Novara – PN2 – Via Marconi 22, Novara – PN3 – Viale dell’Industria 19, Novara – PN4 – Via Verdi 20, Novara – Purchasing Office, Via Palma il Vecchio 111, Bergamo

1. Management commitment

Prochimica Novarese S.p.A. is committed to providing all workers, contractors and visitors with safe and healthy working conditions, preventing work-related injuries and ill health and promoting a proactive safety culture at all sites. Management considers occupational health and safety a strategic priority, on the same level as product quality, environmental protection and business performance. The Company allocates adequate resources (people, time, budget) to implement and continuously improve its health and safety management system.

Senior Management commits to:

- comply with all applicable occupational health and safety laws and other subscribed requirements;
- integrate health and safety considerations into business decisions, investment planning and change management processes;
- lead by example, demonstrating visible commitment to safety in daily activities;
- make this Policy available, communicated and understood by all workers and relevant stakeholders.

2. Fundamental principles

Prochimica bases its occupational health and safety approach on the following principles:

- **Risk-based approach:** systematically identify hazards, assess and control risks in all activities, processes and workplaces through the Risk Assessment Document (DVR) and its updates.
- **Prevention first:** prioritise elimination of hazards and substitution with less dangerous alternatives, before relying on organisational or personal protective measures.
- **Participation and consultation:** involve workers and their representatives in hazard reporting, risk assessment, definition of controls and investigation of incidents and near misses.



- **Competence and awareness:** ensure that all workers receive suitable information, training and instruction on health and safety risks, procedures and emergency measures.
- **Safe workplaces and equipment:** design, operate and maintain buildings, installations, machinery and equipment so that they can be used safely, in line with legal and technical standards.
- **Emergency preparedness:** maintain and periodically test emergency plans (fire, chemical spills, accidents), with drills and coordination with external emergency services where appropriate.
- **Continuous improvement:** monitor performance, investigate incidents and non-conformities, and implement corrective and preventive actions to strengthen the system over time.

3. Health and safety objectives and targets

The Company defines qualitative objectives and quantitative targets for occupational health and safety, aligned with its overall strategy and reviewed at least annually in the Management Review.

Qualitative objectives include, in particular:

- create and maintain a work environment in which all workers feel responsible for their own safety and that of colleagues;
- increase the reporting of near misses and unsafe situations, treating them as opportunities for learning and improvement rather than for blame;
- ensure that all new hires and contractors receive appropriate induction and job-specific safety training before starting activities;
- integrate health and safety criteria into the design and modification of processes, plants and products.

Quantitative targets (baseline 2024, examples to be adapted each year) include:

- increase the total number of hours of training on quality, health, safety and environment compared to the previous year;
- maintain zero workplace accidents with lost time;
- increase the number of reported near misses in the areas of quality, environment and safety, in order to improve hazard identification and preventive measures.

These targets are supported by annual action plans defined by Management and monitored through specific indicators (training hours, number and type of accidents, near misses, safety inspections,



corrective actions). The results and progress against targets are presented and discussed during the Management Review.

4. Implementation and responsibilities

Overall responsibility for occupational health and safety lies with Senior Management, which appoints a Management Representative for the coordination of the health and safety management system. Line managers are responsible for implementing this Policy within their areas, ensuring compliance with procedures and safe working practices.

All workers, regardless of their role, are required to:

- follow safety instructions and use equipment, machinery and personal protective equipment correctly;
- immediately report any hazardous situation, near miss, accident or unsafe behaviour;
- participate in training and actively contribute to improving health and safety in the workplace.

Prochimica expects contractors and visitors to comply with site rules and provides them with appropriate information on hazards and emergency procedures.

5. Communication and review

This Health and Safety Policy is communicated to all employees, displayed at all sites and made available to interested external parties. The Policy is reviewed at least once a year, and whenever significant changes occur in activities, processes, legislation or organisational structure, to ensure it remains appropriate and effective.

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