

MAJOR ACCIDENT PREVENTION POLICY DOCUMENT

(pursuant to Art. 14 and Annex B, paragraph 1 of Legislative Decree 105/2015)

Lainate establishment

The Management of CAVENAGHI S.p.A., aware of the risks associated with the hazardous substances present at its Lainate establishment, assumes the prevention of major accidents and the protection of human health, worker safety, the population, and the environment as priority objectives integrated into the overall management of its business activities.

The Management is committed to providing the human, technological, and financial resources necessary for the implementation of this Policy and for the continual improvement of its Safety Management System (SGS), embracing the inspiring principle of European Directive 2012/18, according to which the safe operation of an installation depends on the overall management criteria adopted.

GENERAL PRINCIPLES (OUR PHILOSOPHY)

The priority objective of CAVENAGHI S.p.A. is therefore to balance the safeguarding of the health and safety of people (employees and residents living near the plant) and the environment with its corporate goals, through actions aimed at preventing the risks of major accidents.

The Major Accident Prevention Policy is inspired by the following fundamental principles of action, which guide the strategic and operational decisions of CAVENAGHI S.p.A.:

- ✓ **Integrated prevention:** considering safety right from the design phase of every plant or process, or upon the introduction of a substance.
- ✓ **Shared responsibility:** as safety is not an isolated task, but an individual and collective responsibility of every worker.
- ✓ **Transparency:** maintaining an open and transparent channel of communication with the Authorities, the population, neighboring companies, and workers.

OBJECTIVES (OUR GOALS)

To give concrete substance to the principles set out above, the following general objectives are established:

- **Risk Minimization and Management:** eliminating possible causes that can lead to releases, fires, or explosions, ensuring that the risk of major accidents—defined as the combination of probability and severity of effects—is compatible with current regulations and the current state of knowledge and technology.
Systematic Risk Approach: ensuring that technical, organizational, and managerial decisions that can affect the safety level are made through a systematic approach to risk management, aimed at identifying, assessing, and controlling major accident hazards throughout all phases of the life cycle of plants, processes, and business activities.
- **Legislative Compliance:** compliance with current relevant laws and national and international standards, and timely adaptation to new ones.
- **Continuous Improvement:** progressive reduction in the number of near-misses, operational anomalies, and non-conformities through corrective/improvement actions, constantly demonstrating the commitment to ensuring an increasingly higher level of protection for human health, worker safety, the population, and the environment.
- **Growth of Safety Culture:** through training and the promotion of hazard reporting by personnel.

COMMITMENTS FOR THE PREVENTION OF MAJOR ACCIDENT RISKS

To achieve the objectives described, CAVENAGHI S.p.A. is committed to:

- Identifying current risks and constantly redefining objectives and tools for the continuous improvement of safety, periodically verifying their implementation status.
- Organizing human resources in terms of skills, decision-making autonomy, and responsibility.
- Disseminating, promoting, and sharing the Prevention Policy and safety objectives, involving all workers at all levels.
- Ensuring the necessary resources for technical, organizational, and managerial interventions aimed at the continuous improvement of safety, compatibly with the company's financial viability.
- Informing, educating, and training all employees regarding the potential risks associated with the activity.
- Ensuring that third-party personnel adopt behaviors and procedures within the plant that are consistent with the Prevention Policy, guaranteeing them adequate information on the specific risks of the plant and strictly monitoring their operations.
- Designing and operating the plants in a manner compatible with the protection of safety, health, and the environment.
- Monitoring safety performance to progressively raise company standards and monitor the implementation of this Policy.
- Cooperating with public Authorities on any issues that may arise regarding major accident risks and for the management of emergency procedures.

IMPLEMENTATION TOOLS: STRUCTURE OF THE SAFETY MANAGEMENT SYSTEM (SGS)

To put its principles into practice, the Operator implements a Safety Management System (SGS) structured according to the principles of Annex III of Directive 2012/18/EU, transposed in Annex 3 of Legislative Decree 105/2015.

1. **Organization and Personnel:** definition of organizational charts, job descriptions, and responsibilities; training and information activities; collection, archiving, and distribution of legal provisions; management of documentation, procedures, legal requirements,

and relations with Public Administrations; regulation of access and circulation of vehicles and people, surveillance services, and safety rules; control over procurement and contracts; signage management; management of PPE (Personal Protective Equipment) and CPE (Collective Protective Equipment).

2. **Identification and Evaluation of Major Hazards:** identification of major accident hazards, assessing the probability of occurrence and the severity of potential consequences under normal and abnormal conditions; collection, archiving, and distribution of technical documentation.
3. **Operational Control:** adoption of operating instructions, procedures, and manuals for the safe operation of installations, including preventive maintenance and the management of modifications to installations or organization; definition and use of Batch Sheets; use of department logs; management of maintenance and work on plants through Work Requests and Work Permits; control of equipment and installations subject to statutory inspections; periodic control and testing of safety-critical elements, firefighting, and emergency equipment.
4. **Modifications and Design:** design activities (new plants, expansions, and interventions); modification management; management of modification works, third-party companies, and construction sites; controls, testing, and commissioning.
5. **Emergency Planning:** updating the IEP - Internal Emergency Plan; training of emergency team members; organizing periodic drills to test the response readiness of all personnel; management of emergency equipment/materials, including first aid kits/packs.
6. **Performance Monitoring, Audit, and Review:** periodic assessment by Management of the overall effectiveness of the SMS through performance monitoring—by investigating and analyzing accidents, incidents, near-misses, anomalies, and non-conformities; internal audits; operational controls; checks on the implementation of procedures—as well as the performance indicators adopted. This is also done by reviewing the achievement of set objectives, the adequacy of available resources, the evolution of the regulatory and technological context, and any opportunities for improvement. The results of the monitoring and review activities form the basis for defining corrective and preventive actions, and therefore for updating the safety objectives and the SGS Improvement Plan, in a process of continuous improvement.

INTEGRATION OF THE SAFETY MANAGEMENT SYSTEM (SGS) WITH OTHER COMPANY MANAGEMENT SYSTEMS

Starting from September 1995, CAVENAGHI S.p.A. obtained the Quality Management System (SGQ) certification from Certiquality, currently compliant with the UNI EN ISO 9001:2015 standard, and since March 2007, the Environmental Management System (SGA) certification, currently compliant with the UNI EN ISO 14001:2015 environmental standard.

Wherever possible, a process of integrating the different corporate systems - SGQ, SGA, and SGS - into what is the Integrated Management System (SGI) is being pursued, resulting in a rationalization of procedures and documentation in general, as well as operations.

SAFETY MANAGEMENT SYSTEM IMPROVEMENT PLAN

An improvement plan for the prevention of major accident risks has been drawn up and approved by the Operator. This plan details the activities and investments planned for safety improvement over the next two years and is included in the improvement plan of the corporate Integrated Management System (SGI). The improvement plan is attached to this document and forms an integral part of it, but is not made public.

DISSEMINATION AND REVIEW

The Major Accident Prevention Policy is disseminated to all company personnel, displayed in the workplaces, and made available on the Company's website. It is reviewed at least every two years or in the event of a modification with significant repercussions on major-accident hazards, to verify its relevance and adequacy, in consultation with the Workers' Safety Representative (RLS).

Lainate, May 29, 2026

THE OPERATOR
DR. MASSIMO BALCONI

