



Designing Energy

INTEGRATED MANAGEMENT SYSTEM

POLICY OF QUALITY, ENVIRONMENT, HEALTH, AND SAFETY



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A. MANAGEMENT'S STATEMENT

The General Directorate, in view of the market's rising demand of established qualitative standards and convinced of the internal improvements achievable by developing a culture of quality, respect of the environment and the requirements of health and safety in the workplace, has implemented and maintains an **Integrated Management System for Quality, Environment, Health and Safety** that meets **ISO 9001, ISO 14001, and ISO 45001 standards**.

The General Directorate emits, adopts, and disseminates at every company level the following document which defines the direction of the commitment of the company, principles of action, and general objectives, based on which quality, environmental, and safety performance on the workplace will be assessed. For APS the observance of contract requirements, respect and safeguarding of the environment and the requirements of safety and health in the workplace, have always been an aspect toward which the General Directorate has paid great attention. The organization is committed to improving its performance in compliance with current legislation and regulations, including any agreement signed with external organizations.

B. OBJECTIVES

The Policy, which is embodied in the improvement Plan, prioritizes the undertakings included in the following list, that constitutes the framework to define goals, milestones, and therefore, the actions to implement the policy:

- ✓ Comply with the provisions and recommendations set forth in the Code of Ethics, Privacy Policy and the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 adopted by the Company.
- ✓ Ensure the continuous improvement of the Company's processes by applying the Quality, Environment, Health, and Safety at workplace System and its performance.
- ✓ Ensure compliance with the requirements set forth in the current legislation and any other requirements endorsed by the Company.
- ✓ Defining, disseminating, and promoting within the Company the goals and continuous improvement of the Quality, Environment, Health, and Safety at workplace and its implementation programs.
- ✓ Share accountability with the entire business organization, involving and consulting workers and, if necessary, safety representatives and union parties.



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- ✓ Favor preventive actions, which must prioritize Health and Safety in the workplace over common and individual protective actions.
 - ✓ Raise awareness, train, and inform workers on Quality, Environment, Health, and Safety aspects in the workplace.
 - ✓ Meet the training needs included in the Company's annual training plan.
 - ✓ Provide workers with the necessary tools to perform work activities.
 - ✓ Identify the needs and expectations of the Client, translate them into requirements and comply with them.
 - ✓ Achieve Client satisfaction through high quality of the manufactured product.
 - ✓ Provide qualification and monitoring of Vendors/Subcontractors of products and/or services.
 - ✓ Use the findings of the evaluation and performance analysis to set improvement actions for the Integrated Management System.
 - ✓ Ensure the consistency of the Company Policy with the findings of the context analysis.
 - ✓ Regularly review the Company Policy and the implemented Management System.
 - ✓ Address efficiently the needs and expectations of the involved parties.
 - ✓ Understand and track the environmental impact produced by the organization, considering ongoing climate change.
 - ✓ Make all business functions accountable by involving and informing their employees and raising awareness among Vendors/Subcontractors for them to develop proper environmental consciousness.
 - ✓ Conduct effective pollution prevention according to the following priority order: prevention, reuse, and recycling.
 - ✓ Optimize waste management by promoting separate waste collection actions under the principle of striving, where possible, for recovery and recycling instead of direct disposal.
 - ✓ Gain in-depth knowledge of the production system and company energy needs through the collection, structured management, monitoring, and analysis (Energy Audits) of energy consumption and related costs.



- ✓ Establish a systematic approach to continuous improvement of energy performance while identifying the main critical issues, defining the improvement plan and priorities for intervention.
- ✓ Control and reduce the environmental impact related to its energy system by undertaking a progressive procurement diversification and preferring, whenever possible, the use of energy from renewable sources.
- ✓ Raise awareness among employees so that APS workers are constantly informed, involved, and aware of the strategic importance that the issue of rational and responsible energy consumption holds for the Company (by changing simple "habits" or misbehaviors and adopting virtuous behaviors aimed at reducing energy waste).

These goals, to be achieved, require the use of an instrument that directs every single business activity, from the easiest to the most complex, to the proper management in compliance with Quality, Environment, Health, and Safety in the workplace. This policy implementation tool is the Integrated Management System. The General Directorate requests the staff, at every level, to responsibly operate in compliance with the legislation and other norms and regulations issued by the business organization. The goals, and related programs, are defined during the framing of the System review and their achievement is tracked over time through process and performance system inspections. The Integrated Management System is outlined in the Integrated Manual, in the procedures and the operating instructions that define the business processes; these documents define how each aspect of the work needs to be carried out, as required by the standards, clarifying what are the connections and the plannings introduced so that APS can provide products/services in accordance with the laws and the requirements of Clients.

C. BASIC PRINCIPLES

1) Job Order management

Participate in tenders by making technical-economic offers that are in line with Client's needs and that reflect technical-organizational and economic-financial abilities of the organization. Verify that there are no deviations between request and offer when entering a procurement contract (if not, provide clarification). Plan and schedule the job order and the interfaces with other operators involved to facilitate its management. Working to ensure that the production process can be carried out technically and economically under controlled conditions and in accordance with the executive project.

2) Prevention

The introduction of new executive processes and products/services (job orders) involves a preventive assessment of workers' environmental, health and safety risks.

The preventive assessment of the job order serves the purpose of minimizing the environmental impacts and safety risks during the production and realization. Change the impact of company products/services and processes on the environment and workplace safety, through:

- Rationalized use of facilities, resources, materials, raw materials, and substances deemed hazardous to the outdoors.
- Search and use the best available techniques at sustainable costs in the implementation phase of the work.
- Development of appropriate controls to monitor negative impacts on the environment.
- Energy saving.

3) Training, culture and behaviour

At APS, according to their own skills, everyone is committed to increasing training, awareness, and people's involvement. Each person is educated and involved to have the abilities and the skills needed to:

- Be aware of his/her responsibilities towards the Quality, Environment, Health, and Safety in the workplace.
- Constantly strive for its protection and that of others.
- Create a connection based on sharing environmental, health and safety goals among colleagues.
- Raise staff awareness of the environmental impact of plastics by promoting waste collection actions with the principle of striving, where possible, for recovery and recycling in lieu of direct disposal.
- Show the environmental aspects, significant impacts and risks associated to their activities.

The induction of new staff occurs in an integrated way, combining adequate training, in accordance with the goals of the Integrated Management System.

4) Communication

APS employees must seek clear internal communication of corporate objectives regarding Quality, Environment, Health, and Safety in the workplace and define communication channels that enable the results obtained to be made available to the public. Effort must continuously be intensified to share experience in the environmental field, communicate with and involve all interested parties.

5) Collaboration with Vendors and Subcontractors

It is necessary, if possible, to share our improvement goals with Vendors and Subcontractors, agree on development programs in terms of production efficiency and improvement, as well as preferring Vendors/Subcontractors that demonstrate that they share this approach. To this end, measures are put in place to ensure that contractors that work in business areas on behalf of the company will implement environmental and Health, and Safety compliance standards equivalent to the ones internal in the company.

6) Continuous improvement

The Integrated Management System, in its broadest sense, provides added value to business performance and job orders. It is necessary to obtain and maintain results through constant efficiency improvements, based on sustainable development of job orders, processes and the Integrated Management System and organized program management.

D. SUPERVISOR OF THE INTEGRATED MANAGEMENT SYSTEM

The General Directorate appoint a resource who has the responsibility to ensure that the requirements of the Integrated Management System and any documents applicable to it (Manual, Procedures, Operating Instructions, etc.) are implemented and maintained, in accordance with applicable regulations and adopted Quality Standards.

E. STAFF

All APS personnel are responsible for complying with and implementing the requirements of the Integrated Management System, within their areas of responsibility.

Dott. Di Domenico Domenico
Sole Director