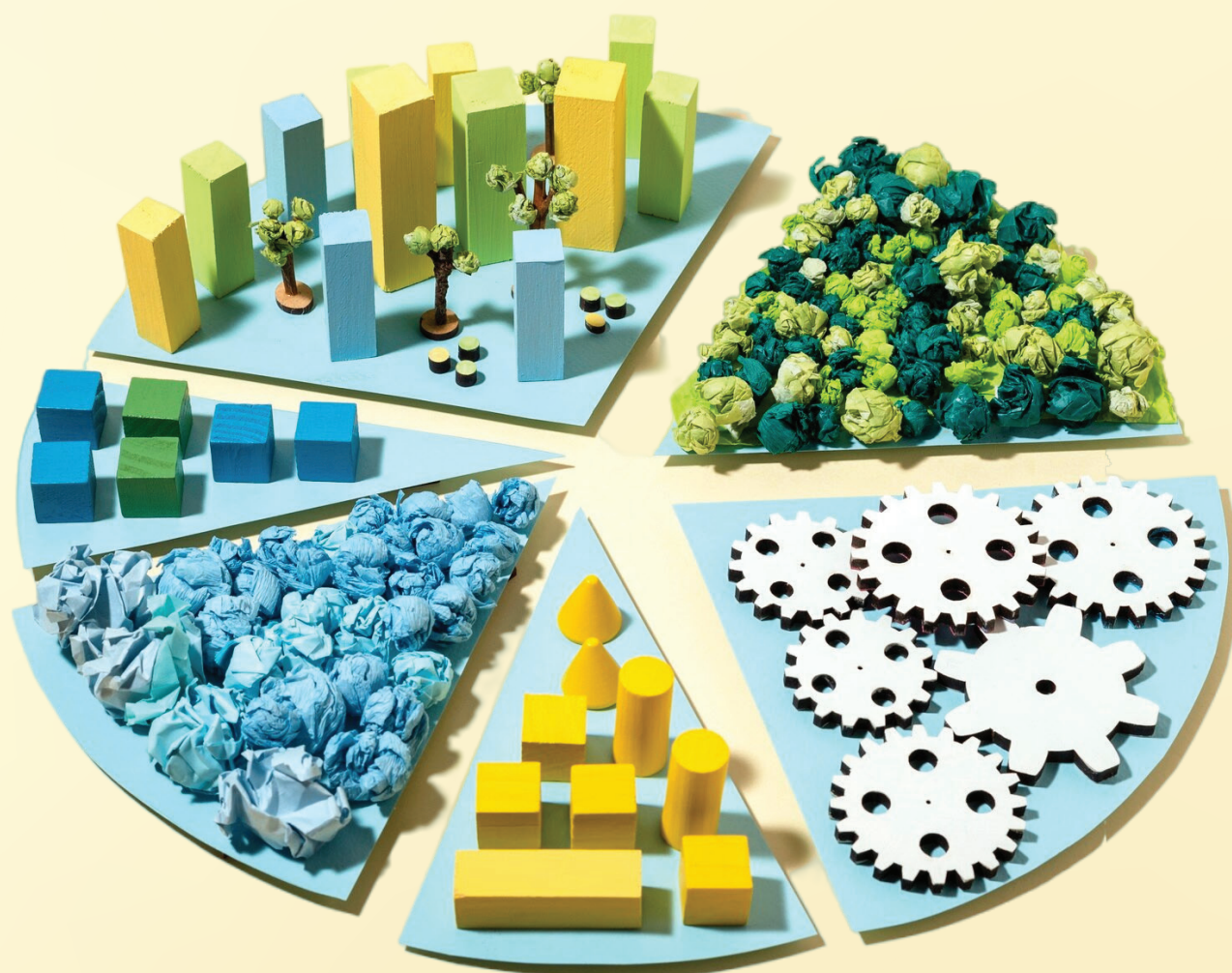


20

Issue 2
March 2024

24

**Q-EH&S
Policy**



Global Policy (GPL)

Q-EH&S Policy Management

Code: DN.GPL.59.18	Issue: 2 (March 2024)
Purpose	Describe how De Nora manages its QEHS Policies
What I have to do	Read and supervise the execution of the activities in a timely and effective manner to ensure the observance of the principles.

Sponsor	Chief Executive Officer
Change Agent	Quality and EHS Manager
Other impacted functions	Local Management Local Q EHS Managers
References	<ul style="list-style-type: none"> • UNI EN ISO 9001:2015 • UNI EN ISO 45001:2018 • UNI EN ISO 14001:2015 standards
Superseded Docs	None
Applicability	All De Nora Group companies and third parties
Distribution	All DN Personnel
Approver	Paolo Dellachà <i>Chief Executive Officer</i> 

Contents

1 Key Principles	2
2 Objectives and pillars	3
3. Responsibilities and monitoring	4
4. Annexes	4
5. Change log	4

Acronyms and definitions

Quality Management System: Management System implemented in accordance with the principles of ISO 9001:2015, which defines the requirements that an Organization can use to demonstrate its ability to regularly provide products and services that meet customer requirements and applicable mandatory requirements and aims to increase customer satisfaction.

Environmental Management System: Management System implemented in accordance with the principles of UNI EN ISO 14001:2015, which defines the requirements that an Organization can use to create and maintain an environmental management system, eventually aimed at keeping track and improving its environmental performance

Health and Safety Management System: Management System implemented in accordance with the requirements of UNI ISO 45001:2018, which provides the criteria and guidance for its use to enable the organizations to set up safe and healthy workplaces, preventing work-related injuries and illnesses, as well as proactively improving their H&S performance.

1 Key Principles

Running its business, the Company makes no compromise on health and safety protection of its employees and of all affected people.

IDN and all De Nora Group recognize that the maintenance of high-end Quality, Environment, Health and Safety standards in all their activities is the key for success in all business arenas and reputation.

The Board of Directors of Industrie De Nora approved the first revised version of this Policy in October 2022 and will always be involved in its subsequent updates. The Subsidiaries adopt the principles and rules included in the Policy through a resolution of the Board of Directors (or the corresponding body/function/role if the governance of the respective company does not provide for such a body) during the first useful meeting.

Therefore, the whole Company is firmly committed to include Health and Safety, Quality and Environment issues as part of its business strategies and initiatives.

Global Health and Safety

H&S KPIs and targets must be defined according to the results of the previous year, considering that:

- the only acceptable result for injuries and first-aids is 0 (zero);
- continuous improvement is the only way to get the required targets.

Detailed figures about KPIs are reported in the Safety Triangle, which consists of a graph that monitors the company's performance with respect to health and safety issues updated on a monthly basis.

All applicable legal requirements must be fulfilled and, where more demanding, Corporate requirements.

The highest standards to prevent any accident during the entire lifecycle of products are required, both for internal workers and contractors, as well as safe and healthy working conditions must be provided and maintained by eliminating hazards and reducing risks. Any misalignment (i.e.: near-miss, first-aid and injury) is therefore analyzed in its root causes and fixed.

Consultation and participation of all workers and workers' representative, and their contribution to H&S results improvement, is always required and encouraged.

Global Quality

IDN and all Legal Entities recognize that maintaining high standards of quality in all their activities is key to reputation and success in all areas of business. Therefore, the entire Group is firmly committed to including quality issues as an integral part of its business strategies and initiatives.

For this reason, the Company conducts its business with maximum care of quality of products and services, offering to its Customers the highest technological standards of products and the most reliable support for any technical and service requirement. Delivery the right quantity on time is one of the major focus the Company is pursuing.

Global Environmental

The Company is also committed to ensuring that environmental protection is embedded in its culture by supporting programs to reduce its environmental footprint and impacts consistent with the following principles:

- commitment to environmental protection, including pollution prevention and other specific commitments relevant to the organization's context;
- commitment to climate mitigation and adaptation, with reduction of environmental impacts;
- preserving and protecting the environment in which it operates, using resources efficiently and ensuring sustainability throughout its value chain;
- comply with all applicable environmental protection laws and additional stakeholder compliance regulations;
- distribute specific responsibilities among all levels of management to enforce and monitor standards of environmental protection (such as national and international laws, as well as internal regulations);
- promote training to all staff to enable the professional development of employees, with the aim of integrating continuous improvement activities into daily work;
- commitment to continuous improvement of the environmental management system to enhance environmental performance
- spreading a corporate culture focused on staff behavior that respects and encourage environmental protection;
- ensure the reduction of environmental impacts over time, adopting as far as possible the most advanced technical standards, knowledge and techniques;
- define and adopt specific objectives and KPIs aimed at improving the performance of the environmental management system;
- conduct inspections and audits (through internal and external subcontractors as opposed to its own) to detect and prevent any situation of non-compliance with the requirements of the management system;
- monitor and promote investments aimed at reducing energy consumption.

2 Objectives and pillars

DN has adopted Management Systems that comply with UNI EN ISO standards, which, through a systematic approach, aim to facilitate the achievement of the following objectives:

- preliminary assessment of changes to: processes, products and equipment that may affect health and safety and environmental risks;
- use of the best available technologies for managing significant direct and indirect environmental aspects, external and internal;
- containment of occupational health and safety risks through preventive measures and the use of Collective and Individual Protection Devices;
- identification of Environmental, Quality and Safety Performance Indicators to assess the effectiveness of the Management System;
- planning of educational courses and information and training activities for personnel at all levels, with the aim of raising awareness and empowerment of resources to the issues covered by the System;
- outward communication of the results achieved;
- dissemination to all personnel through the translation in all the languages spoken within the Group, the publication of the Q-EH&S policy and system documents useful for carrying out activities;
- disseminating within the company and at every level the objectives.

The observance of some of the principles outlined in the Policy is to be extended to third parties in De Nora's supply chain. Specifically, De Nora has set up a process of assessment, by filling out a specific form, at the supplier qualification stage, of compliance with certain ESG criteria including environmental principles.

Current and potential suppliers are also asked to adhere to the normative contents expressed in the Code of Ethics for Suppliers, by requiring acceptance of the latter in the contractual Terms & Conditions, in order to initiate or maintain business relationships with the Group.

Therefore, the main pillars of IDN Q-EH&S policy are:

- No injuries / no first aid in each premises;
- Root cause analysis of each “misaligned” event;
- Application of PDCA method for continuous improvement;
- Higher customer satisfaction;
- Decrease of the direct and indirect impact of the Company on the environment and on climate;
- Optimization and effective consumption of resources;
- Stimulation of environmental protection among suppliers and subcontractors.

The company provides, as an integral part of its activities and strategic commitment, human, instrumental and economic resources with a view to continuous improvement, the results of which will be analysed periodically to define the lines of action to be taken.

3. Responsibilities and monitoring

The Global Operations function is responsible for the regular revision of the policy and its communication to all employees. The revision of the Q-EH&S policy is carried out at least annually.

The company's Quality and EH&S Manager will implement all necessary efforts to ensure compliance with this policy by:

- periodically verify the implementation, effectiveness and adequacy of the Management Systems;
- verify the progressive improvement of performance, objectives and targets achieved.

The Quality and EH&S Manager has implemented a plan to disseminate this Policy document so that it is available to all employees, customers, suppliers, visitors and interested parties. This Policy is reviewed by the Quality and EH&S Manager on an ongoing basis to assess the relevance of its contents.

The Policy will be communicated to all employees and included in the Safety training provided to the employees annually. The Policy will also be included in the Onboarding program.

4. Annexes

Document Code	Title	Distribution
DN.GPL.59.18 A1	Global Operations Hoshin Kanri for QEH&S	All DN People

5. Change log

Issue	Change description / Reason for Change	Interested Chapters
1 (01.2018)	First Issue	All
2 (03.2024)	Update of policy and its management	All