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The Management of FORNOVO GAS S.p.A., aware of the strategic importance of the quality of its products and services, the protection of the health and safety of workers and the prevention of environmental pollution, has implemented a management system in compliance with UNI EN ISO 9001, 14001 and 45001 Standards and EU Directives.

In order to demonstrate a responsible approach to the environment and climate change, the Company has decided, at the Management's request, to assess its carbon footprint, by undertaking the process of quantifying and reporting of GHG emissions.

The Company adopts and implements the Code of Ethics, where the principle of Equality applies, i.e., uniformity of treatment and social relations towards all interlocutors, without any discrimination for reasons related to gender, sexual orientation, age, nationality, state of health, political and trade union opinions, race, religious beliefs and in general any characteristic of the human person.

As of October 2022, the Company has become a Benefit Company to internalise in its Articles of Association and in its mission, commitments of common benefit both for future company generations and for the local community.

The adoption of the Benefit Company status formally establishes the Company's commitment to pursuing common good objectives, operating in a responsible, sustainable and transparent manner towards the environment, employees and collaborators, the community and the territory.

In this regard, the FG spa Benefit Company has chosen to adhere to corporate welfare in order to be able to better help employees and to contribute to their well-being.

The Company is committed to providing healthy and safe working conditions for employees, collaborators, suppliers and visitors and strives for the continuous improvement of health and safety in the workplace, the quality of the products and services offered and environmental performance, taking into account its size, its context and the risks and opportunities that arise from it.

OBJECTIVE: to provide a workplace without accidents, injuries and occupational diseases, to promote environmental sustainability, to permanently change the attitudes and culture of safety, environment and quality in the Company and to motivate employees to continuously improve safety, their working conditions, product quality and customer satisfaction and to reduce environmental impacts.

In order to implement and improve the management system, Fornovo Gas has analysed and considered the variables of its context and has classified the interested parties, identifying strategic risks and opportunities.

The Company's aim is to:

- 🌱 Comply with the mandatory requirements contained in the applicable legislative and technical regulations and fulfil its own compliance obligations, also voluntarily subscribed;
- 🌱 Comply with all current legislation on environmental safety in the workplace and collaborate with public authorities to try to minimise the effects that the activities carried out may have on the internal environment and the surrounding territory, taking particular care to activate tools to prevent emergency situations;
- 🌱 Promote a conscious and sustainable way of conducting business, based on products, processes and practices that minimise negative impacts and amplify the positive impact of economic activity on people, the environment and the territory, also promoting the choice of sustainable products, processes and practices among its customers and suppliers;
- 🌱 Implement and promote initiatives aimed at disseminating in the territory a sustainable corporate culture that is attentive to and respectful of the environment and the needs of Stakeholders and aimed at raising awareness in the local community on corporate sustainability issues;
- 🌱 Recognise gender equality as an essential element of civilisation and affirmation of universal human rights, as well as a strategic factor for increasing value creation and for the development of the Company
- 🌱 Promote the continuous improvement of the products offered to its customers and of its environmental and risk prevention performance;
- 🌱 Encourage the creation of network relations and strategic partnerships between companies that pursue environmental and social sustainability objectives;
- 🌱 Promote awareness of issues related to environmental protection and product quality also to all suppliers of materials and services, including companies to which activities are outsourced.

The Company **Fornovo Gas S.p.A.** undertakes to:

- Identify and adopt processes, technologies and monitoring and inspection systems capable of reducing risks for the environment and workers, promoting the prevention of accidents, possible health effects and increasing product quality, with a view to continuous improvement
- Increasingly involve the Workers' Safety Representative and all the Company's workers so that they become increasingly aware of the importance of their role in the correct management of production processes and in the simultaneous improvement of environmental and working conditions, and a widespread sense of proactivity so that a sharing process is feasible
- Consistently increase, through specific personnel information and training programs, the competence and responsibility of Managers, Supervisors, the WSR and all workers
- Promote the principle of environmental protection and health and safety in the workplace to suppliers and contractors operating on behalf of the Organisation, developing cooperation and coordination activities and requesting the improvement of operating practices consistent with what is established and undertaken by the Organisation, also in terms of reliability of the products supplied by suppliers
- Request the reporting of any critical issues found in the implementation of the management system and the initiatives undertaken in response to the guidelines dictated by the Policy
- Pursue the continuous improvement of the technical characteristics of the products designed and manufactured, to qualify and consolidate the corporate image and in compliance with international directives such as the Pressure Equipment Directive 2014/68/EU (PED)
- Invest in research and innovation projects, aimed at the continuous development of know-how and the identification of increasingly effective solutions in the field of socio-environmental sustainability

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- Implement innovation and improvement programs and appropriate prevention and protection measures with the aim of significantly reducing the number of accidents at work, constantly improving environmental performance, implementing the product range, introducing new technologies to reduce the relevance of impacts on the environment and on workers' safety, improving quality and production efficiency
- Check compliance with this policy by carrying out periodic audits and inspections, continuously checking operational activities, training and information documentation, risk assessment, action plans for prevention and the implementation of procedures for improvement
- Pursue continuous improvement, constantly analysing and monitoring performance indicators
- Monitor the consumption of energy and natural resources in order to improve production efficiency and avoid waste, optimally manage the hazardous substances and waste produced to ensure environmental protection and the health and safety of workers, ensure the efficiency, reliability and safety of the machines and equipment used
- Implement human resource management and development practices that promote an inclusive culture of professional growth, ensuring equal opportunities for all personnel
- Respect for the corporate culture
- Opportunities for growth and inclusion of women in the Company, promoting women's education, training and personal development and autonomy
- Gender pay equity
- Protection of parenthood and work-life balance
- Implement proper waste management, in order to achieve a reduction in the quantities produced and to seek the most appropriate methods of collection, transport and final destination
- Select GHG sources, data and methodologies appropriate to the Stakeholders' needs including all GHG emissions deemed relevant
- *Quantify, monitor and transparently communicate its direct and indirect GHG emissions, in line with internationally recognised standards*
- *Identify, assess and manage climate change risks both at its site and in the supply chain*
- Prevent and correct any dangerous situation by implementing the analysis of the causes and possible remedies even in the case of minor incidents
- Raise employee awareness through appropriate information and training programs, so that personnel at all levels ensure the effective implementation of the integrated management system within the scope of their responsibilities
- Promote and disseminate the "environmental" culture to all Stakeholders including customers, partners, suppliers etc.
- Prefer sustainable and/or eco-compatible purchases
- Intervene with actions aimed at reducing, as far as possible, *direct and indirect greenhouse gas emissions through the definition of targets with a time horizon of at least five years with the industrial plan*
- *Contribute, to the extent of its own competence, to the fight against climate change, thus promoting the achievement of objectives defined at a national and international level*
- *Spread a culture based on a correct approach to environmental issues in relations and decisions inside and outside the Company:*
 - *Select its suppliers and partners, the products and services purchased or outsourced also on the basis of environmental sustainability criteria; evaluate products and services taking into account their entire life cycle, periodically verifying compliance with the above criteria throughout the entire life cycle;*
 - *Identify and assess the environmental risks present in general at the various levels of its supply chain and, in close collaboration with its direct suppliers and also through partnerships at national and international level, adopt appropriate corrective actions and improvement plans to reduce the impact on the environment of the products and services purchased and the processes through which they are made and to safeguard biodiversity;*
 - *Manage the waste generated through its activities in such a way as to prioritise the reuse and recycling of objects, substances and materials, minimising the use of hazardous substances;*
 - *Invest in the research and development of advanced services, solutions and products that are both economically and ecologically sustainable;*
 - *Also consider environmental sustainability aspects in new infrastructure and service development projects with special attention to the preservation of biodiversity;*
 - *Communicate in a transparent and systematic manner to its Stakeholders material information on its environmental performance verified by external and independent parties;*
 - *Communicate and illustrate to its employees, through meetings and initiatives, the social and economic value of environmental sustainability and the initiatives undertaken to put its principles into practice and make them an integral part of its activities*
- Ensure the maintenance of procedures to ensure a high level of product quality and for the routine and emergency management of both environmental and occupational health and safety issues
- Periodically review the Policy, the objectives and the implementation of the management system in order to obtain the continuous improvement of the level of health and safety in the company and meet the requirements of the reference standard and the mandatory requirements of Directive 2014/68/EU
- Assess and keep under control and prevent risks deriving from the performance of its production activities, eliminating the causes of possible accidents and non-conformities, and implementing actions aimed at minimising their occurrence
- Promote and disseminate the participation and awareness of all workers on issues related to safety and the environment, to prevent accidents and emergencies and to continuously improve their management through the improvement of internal communication and the reporting of near misses




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- Continue to ensure the conformity of its products with national and international technical Standards and Community Directives (CE mark), through commercial evaluation and design processes. In this regard, the Company has acquired PED certifications for its products over the years.
- Ensure compliance with Regulation 2014/68/EU in the field of production and materials through the documentation and monitoring by the relevant body
- Concretely support its employees' families in family welfare, both in economic terms and in terms of flexible working hours and remote work
- Reject all types of violence and gender abuse -which are not tolerated and will be punished - and encourage reporting
- Support sports activities and events aimed at promoting gender equality and inclusion
- Encourage participation in training meetings, webinars and debates by all employees regardless of their role and contractual status
- Obtain indications from the Management Review to improve the operation of the management system
- Make prevention even more effective also by recording and analysing near misses, with the aim of increasingly reducing the number of accidents and occupational diseases
- **Constant risk and opportunity management**, for all activities/products and services in order to promptly recognise issues or opportunities and plan improvement actions. Ensure constant monitoring of risks through the analysis of changes, contextual factors and the needs of Stakeholders, continuously verifying operational activities, the progress of training and education, and the progress of action plans for prevention and improvement
- Promote the professional growth of its employees and collaborators, encouraging training and refresher courses, and establishing paths that allow them to gradually achieve their professional objectives
- **Enforce and ensure** compliance of products sold in Great Britain through the UKCA and compliance with "The pressure equipment safety regulations 2016"
- **Develop a calm, collaborative and participative work environment**, characterised by good internal communication and in which Company objectives are shared with employees and collaborators, so that they can also contribute to their definition and realisation and are informed and aware of the results achieved
- **Promote the best environmental and social conditions** in the communities where the Company operates and in the communities where its products are used
- **Maintain** proven supplier reliability in terms of product/service and environmental performance and implement procedures to the procurement of goods and services that are oriented towards the guiding principles of the policy

COMBATING CLIMATE CHANGE





Direct GHG emissions

The organisation is committed to:

-  Reducing its direct GHG emissions by increasing the annual purchase of electricity from renewable sources for its owned site, converting energy contracts and purchasing sustainability credits
-  Aligning with the best environmental standards for its site, by minimising energy consumption and promoting the well-being of its employees and customers
-  Regularly monitoring business trips and increase the number of environmentally friendly vehicles in the Group's corporate fleet



Indirect GHG emissions

The Organisation is committed to:

-  Involving its suppliers and promote the use of renewable energy and the reduction of GHG emissions
-  Reducing the environmental impact of the supply chain by promoting the use of materials with a lower environmental impact
-  Reducing the environmental impacts related to transport by identifying and promoting the use of more efficient and lower impact solutions without affecting operational efficiency and compliance with delivery times.
-  Encouraging its employees to adopt alternative, lower-impact transport solutions

SAFEGUARDING BIODIVERSITY




The Organisation is committed to:

-  Promoting the protection of natural habitats and animal welfare in the areas where its sites are located
-  Maintaining the biodiversity strategy based on a mitigation hierarchy aimed at:
 - Avoiding operations in or near areas of national or global biodiversity relevance
 - Taking measures to minimise the intensity or extent of impacts that cannot be avoided
 - Promoting sustainable forest management by purchasing cellulosic materials for FSC or PEFC supply packaging

PROMOTING PROPER WATER AND WASTE MANAGEMENT




The Organisation is committed to:

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-  Promoting an efficient use of natural resources, including water resources, and minimise the generation of waste at its production sites by constantly monitoring water consumption and the volumes of waste produced
-  Regularly assessing water consumption
-  Managing all waste produced at its plant using authorised and recognised partners





CHEMICALS

The Organisation is committed to:

-  Implementing all the necessary changes to design, produce and use products or services aimed at preventing any negative impact on health, safety and the environment attributable to the production processes or the product itself. The Organisation implements strict chemical safety checks on both its production processes and on the supply chain
-  Adopting a proactive approach to identify and progressively eliminate potentially hazardous chemicals
-  Adopting appropriate practices for the management, storage and disposal of chemicals, especially hazardous chemicals, to prevent soil pollution caused by spills, leaks and improper surface water discharges

PACKAGING

The Organisation is committed to:

-  Reducing the amount of materials used
-  Eliminating conventional single-use plastic
-  Designing products, however feasible given the criticality of raw materials, that can be used for a long time, reused and recycled
-  Constantly promoting innovation through programs aimed at improving packaging design by focusing on recyclability and reducing the materials used

PROMOTING A CULTURE OF SUSTAINABILITY

The Organisation is committed to promoting and spreading a culture of environmental sustainability by creating awareness among all Stakeholders including employees, end customers, local communities, suppliers and business partners.

The company believes that employee involvement in the implementation of the Policy is critical to its success, as responsibility towards the protection of the environment must be everyone's commitment.

The company recognises the precautionary approach to environmental protection as one of the essential principles of its way of operating; with the aim of reducing environmental impacts, the Organisation strives to promptly identify, assess and prevent any environmental risk by taking appropriate mitigation and adaptation measures.

Fornovo Gas S.p.A. Management recognises that integrated quality management, its know-how and its employees/collaborators are the Company's true assets; for this reason, the Company is committed to pursuing UNI EN ISO 9001, 14001 and 45001 certification objectives.

A copy of this document is displayed in all places frequented by workers for widespread dissemination.

Personnel are required to comply with the management system and the related Policies for their activities, and to implement the principles contained in this Policy on a daily basis.

The suitability of this Policy is reviewed annually during the Management Review activities,

The Sole Director



Traversetolo, 23.05.2024