

INTEGRATED MANAGEMENT SYSTEM POLICY

According to BAERLOCHER ITALIA S.p.A., one of the leading producers of tin and liquid mixed metal stabilizers for the PVC industry, the implementation of an Integrated Management System is pivotal in the company's development and success. BAERLOCHER ITALIA S.p.A is active in the following fields: Research & Development, Production, Sale and Technical Service of stabilizers and additives for plastic materials. The main applications for our products are: rigid, semi-rigid and soft-calendered film, extruded and blown film as well as plastisol applications.

With regard to the Context and the Needs and Expectations of Interested Parties:

The Top Management of BAERLOCHER ITALIA S.p.A. is highly engaged in defining and evaluating the reference context in which the organization operates and the expectations of Interested Parties, both internal and external to the site, in order to determine what relevant requirements need to be met in the process activities and what improvement opportunities need to be addressed.

Hence, great attention is paid to constantly understanding the expectations of customers, employees, regulatory agencies and of the neighbouring community, whilst keeping the focus also on local organizations and community groups, visitors and external providers working within the site, with respect to the environmental characteristics of the territory in which the manufacturing plant is located.

The Top Management of BAERLOCHER ITALIA S.p.A. places high importance on assessing the level of <u>satisfaction of its Customers and of Interested Parties.</u>

A primary role in product development is entrusted to the REACH regulation, so as to provide Customers with environment-friendly products for a sustainable future and to improve human health and environment protection through the identification of the intrinsic properties of chemicals. Registration is an obligation which applies both to manufacturers and importers, who have to submit to the European Chemicals Agency (ECHA) detailed product hazard information. Therefore, compliance with REACH requirements is fundamental to our mission.

With regard to the Top Management commitment:

BAERLOCHER ITALIA S.p.A. engages itself to operate in full compliance with statutory and regulatory requirements as well as voluntary commitments, also relating to energy consumption, and to strive for <u>continuous improvement</u> in its Quality, Safety, Health, Environmental and Energy management performance.

The **<u>Objectives</u>** to achieve the Company's vision are set as follows:

- activities conducted so as to safeguard the health and safety of employees and of interested parties;
- prevention and protection measures to avoid or minimize the risk of accidents, also major accidents, injuries and work-related illnesses through hazard elimination and risk reduction, training, information and use of the most advanced and, hence, safest equipment and working instruments;

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- measures not only for pollution prevention, but also for protection of the environment from any form of pollution;

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- strengthening of emergency prevention and emergency preparedness and response;
- attention to both the environmental aspects under our direct control such as air emissions, waste water discharges, waste generation and disposal, noise level and energy consumption and those our organization can indirectly influence, for example the environmental aspects of suppliers, thus identifying the life cycle stages of our products and evaluating the environmental impacts which might be generated;
- communication of the Policy also to external suppliers;
- assessing measures to reduce energy use and consumption, whilst defining objectives and targets with reference to the best available techniques of the chemical industry;
- determining, providing and maintaining available the resources needed to achieve the intended results;
- assigning and supporting responsibilities and authorities, keeping the competence of all employees up-to-date, especially of the personnel performing work that affects quality, environment, safety and energy consumption;
- communicating Quality, Safety, Environmental and Energy performance to all employees and to the personnel working within the site as well as encouraging the personnel to apply any of the approved good practices;
- increasing the energy efficiency in processes by constantly monitoring energy use and consumption, implementing improvement measures and taking into account the estimated energy demand of machinery when purchasing new equipment or designing a new manufacturing process.

BAERLOCHER ITALIA S.p.A. believes employee contribution to be essential in achieving the organization's objectives and maintaining high performance standards, thus we promote people involvement and participation.

BAERLOCHER ITALIA S.p.A. has established and certified its **Quality Management System** according to the standard UNI EN ISO 9001:2015 "Quality management systems. Requirements" and its **Environmental Management System** according to the standard UNI EN ISO 14001:2015 "Environmental management systems. Requirements with guidance for use."

In addition, it has integrated its Management System with the reference framework of the standards UNI 10617:2009 "Plants in risk of major accidents. Safety management systems. Terminology and essential requirements" on **Safety** and UNI EN ISO 45001:2018 "Occupational health and safety management systems. Requirements with guidance for use" on **Occupational Health**.

BAERLOCHER ITALIA S.p.A. is committed to respecting the principles of SA 8000 concerning **Social Accountability** and has adopted the **Code of Ethics** and the **Code of Conduct** part of Baerlocher Group "**Global Compliance Management System**".

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Furthermore, BAERLOCHER ITALIA S.p.A. is willing to contribute to energy saving and natural resources conservation, in line with Baerlocher Group Policy, by either continually improving the energy efficiency or reducing the energy use in its manufacturing plant and implementing an Energy Management System according to the standard ISO 50001.

BAERLOCHER ITALIA S.p.A. has joined Federchimica's initiative "Responsible Care". Moreover, supported by Baerlocher GmbH, it is an active member of the European Chemical Industry Council (CEFIC), European Stabilizers Producers Associations (ESPA), European PVC Industry's Sustainable Development Programme (Vinyl Plus) and of scientific organizations such as Organotin Environmental Programme (ORTEPA).

The Top Management of BAERLOCHER ITALIA S.p.A. views Information & Technology as being essential to effective and efficient <u>Communication</u>, either addressing internal and external Interested Parties, hence acts to maintain up-to-date computer systems to continually fulfill internal needs and regulatory requirements.

The Quality Assurance Representative has been appointed with defined authority for ensuring that this Policy is correctly implemented, whilst also evaluating and reviewing its constant effectiveness.

The present Policy regarding Quality, Environment, Safety and Occupational Health is communicated to all employees within the organization and is available to interested third parties.

Lodi, 20.04.2018

Agostino Savoldi Managing Director

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