



Policy Health & Safety

SIT S.p.A.

Approved by the Board of Directors
of SIT S.p.A. on December 18, 2024

www.sitcorporate.it



Contents



- Premise
- Purpose and Scope
- Regulatory Framework
- Principles
- Implementation and Monitoring
- Training and Communication
- Review



PREMISE

For **SIT**, the **health** and **safety of workers** represent **fundamental and indispensable values** of its way of doing business.

The Group's commitment is to constantly guarantee **safe, healthy and sustainable working conditions** through a structured approach to **prevention, protection** and **continuous improvement**. In this sense, the SIT Group takes very seriously the objective of preventing possible accidents and occupational illnesses, ensuring compliance with all relevant regulations and legal requirements and continuously improving its processes in order to guarantee the best possible safety conditions within its offices and factories.

SIT recognises the importance of a **healthy and safe working environment**, a place where both physical and mental well-being of all persons working for and on behalf of SIT are protected.

SIT globally promotes a **culture of shared responsibility**, calling on all its people to **maintain conscious and responsible conduct**, encouraging strict adherence to company guidelines and the adoption of conscious, safety-oriented behaviour for all. Thanks to the contribution and proactivity of its people, the SIT Group aims to ensure increasingly excellent health and safety standards.

This Policy, consistent with the company's Mission and Vision, expresses SIT's desire to be recognised as the **leading sustainable partner** for energy and climate control solutions, contributing to a safe and sustainable world for all our stakeholders.



SCOPE

The **Health & Safety Policy** applies to **SIT** and its **Subsidiaries**, as well as to **all persons who collaborate with and/or act on behalf of SIT**, in all countries in which the Group operates.

SIT promotes **involvement** and **compliance** with the provisions of this health and safety policy by **the entire value chain** and, in general, by **all its stakeholders**.

PURPOSE

This Policy **defines the Group's principles on Health and Safety** in the responsible and sustainable management of company processes and activities **in line with regulations and legal obligations**, as well as reference **best practices and voluntary commitments undertaken over the years by SIT**.

The Policy promotes the **continuous improvement** of health and safety processes, with action plans based on **prevention and accurate risk assessments**. Furthermore, the Policy aims to **spread a culture of safety and responsibility** among all employees, actively involving them in maintaining a safe and healthy working environment.



REGULATORY FRAMEWORK

The SIT Group's Health and Safety Policy is drawn up in compliance with and provides for compliance with the current regulatory provisions and voluntary codes listed below, by way of example and not exhaustively, as well as company procedures and regulations.

INTERNAL REFERENCES

The SIT group has several internal regulatory instruments, which are linked to the principles listed in this Policy and which support their implementation.

In particular:

- Code of Conduct;
- Human Rights Policy;
- Diversity and Inclusion Policy;
- Environmental Sustainability Policy;
- Code of Ethics for Suppliers and Third Party Intermediaries;
- Whistleblowing Policy;
- Organisation, Management and Control Model pursuant to Legislative Decree 231/2001;
- Local regulations of the group's various offices.



REGULATORY FRAMEWORK

INTERNATIONAL AND NATIONAL REFERENCES

SIT observes and promotes compliance with all regulations in Italy and in the countries in which it operates or may operate. Furthermore, in relation to Health and Safety at Work, SIT is inspired by and promotes the founding principles of the following conventions and declarations of international and European law, listed by way of example and not exhaustively:

- Universal Declaration of Human Rights, UDHR, 1948;
- European Convention on Human Rights, ECHR, 1950;
- International Labour Organisation (ILO) Conventions, in particular:
 - Convention No. 155 on Workers' Safety and Health, 1981;
 - Convention No. 187 on the Promotional Framework for Occupational Safety and Health, 2006;
 - Convention No. 148 on Protection against Air Pollution, Noise and Vibration in the Workplace, 1977.
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work, 1998;
- European Framework Directive 89/391 EEC on Workers' Health and Safety, 1989;
- Consolidated Occupational Health and Safety Act, Legislative Decree No 81 of 9 April 2008;
- Supplementary and corrective provisions of Legislative Decree 81/08, Legislative Decree no. 106 of 3 August 2009;
- State-Regions Agreement on Compulsory Training for Workers, Supervisors and Managers in Occupational Health and Safety, 2016;
- European Parliament Resolution of 10 March 2021, with recommendations to the Commission concerning due diligence and corporate responsibility.



REGULATORY FRAMEWORK

INTERNATIONAL AND NATIONAL REFERENCES

In addition, the Group is inspired by the following initiatives and guidelines:

- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, 2011;
- Guiding Principles on Business and Human Rights: Protect, Respect and Remedy Framework, 2011;
- UN Global Compact, 1999;
- ISO 45001 - Management Systems for Occupational Health and Safety, 2018;
- UNI EN 689:2019 Standards - Guidelines for the assessment of inhalation exposure to hazardous chemical agents, 2019;
- UNI EN ISO 9612:2011 Standards - Guidelines for the measurement of noise exposure in the workplace, 2011;
- INAIL Circular - Guidelines and operational indications.





PRINCIPLES

Health and Safety as an inalienable right

Recognise health and safety at work as indispensable conditions for a working environment that respects the dignity and well-being of workers.

Regulatory compliance

Recognise the importance of complying with all occupational health and safety laws and regulations, as well as following the guidelines of the best international standards to ensure a safe and compliant working environment.

Risk identification and accident prevention

Recognise the importance of identifying and assessing workplace risks, taking preventive measures to avoid accidents and ensure worker safety.

Application of a structured safety management system

Implement a structured and integrated occupational safety management system to ensure the planning, implementation, monitoring and continuous improvement of company safety practices.

Training and awareness-raising

Promoting a corporate culture that values health and safety, with a view to shared responsibility, by ensuring the continuous training and sensitization of employees to develop safe and responsible behaviour in the workplace.



PRINCIPLES

Promoting mental and physical well-being

Valuing and supporting the mental and physical well-being of workers, promoting a good work-life balance to improve quality of life and productivity.

Constructive cooperation with workers' representatives

Establish open communication and constructive dialogue with workers' representatives to ensure effective management of health and safety at work, valuing their contribution in the evaluation of any interventions that may be necessary to improve health and safety conditions for all workers in all company environments.

Health and safety in the supply chain

Recognise the importance of ensuring health and safety conditions not only within the company, but also throughout the supply chain, by ensuring that suppliers and partners comply with appropriate standards.

Continuous improvement

Recognise the importance of an ongoing process of reviewing and improving health and safety practices to ensure an increasingly safe and healthy working environment.



Health and Safety as an inalienable right

In line with its Human Rights Policy, SIT recognises health and safety at work as a fundamental right of every worker and considers it essential to guarantee all personnel and collaborators involved in company activities a safe and healthy workplace.



SIT is committed to:

- **Respect** and **protect** the right to health and safety of every worker by adopting strict standards to ensure safe and decent working conditions;
- **Ensure** respect for health and safety as an essential part of SIT's approach to human rights, ensuring that company practices never compromise the welfare of workers.



Regulatory compliance

SIT scrupulously complies with local, national and international occupational health and safety regulations. The Group regards compliance as a minimum requirement and follows the strictest provisions to ensure the well-being of its employees and collaborators, promoting a working environment where health and safety are always a priority.

SIT is committed to:

- **Ensure** strict compliance with applicable regulations by continuously monitoring legal requirements and implementing the necessary measures to maintain full compliance;
- **Adopt** and **enforce** higher safety standards than those required by law, where possible, in order to protect workers and minimise risks;
- **Conduct** periodic audits of processes and working conditions to ensure that all activities are carried out in accordance with regulations and global industry best standards.



Risk identification and accident prevention



SIT actively identifies the risks associated with its activities and implements prevention strategies to minimise the likelihood of accidents. The company sees risk management as a fundamental responsibility to create a safe, healthy and productive working environment, thus ensuring the well-being of its employees and collaborators.



SIT is committed to:

- **Conduct** regular, in-depth risk assessments to identify potential hazards and areas for improvement in work practices, both in production facilities and offices;
- **Implement** targeted prevention measures, including regular health checks, training and dissemination of standardised operating procedures, to address identified risks and reduce the likelihood of accidents;
- **Encourage** all employees, through targeted awareness-raising initiatives, to report risk situations and actively participate in occupational safety initiatives.



Application of a structured security management system

SIT adopts a systematic approach to occupational health and safety management through a structured system that follows international best practices and recognised standards. This system ensures that all company activities are planned, executed and controlled to minimise risks and constantly improve safety conditions. SIT considers the involvement of all company levels to be essential to ensure that safety policies are effective and that improvements are based on continuous performance analysis.

SIT is committed to:

- **Implement** a structured safety management system, based on internationally recognised standards, to ensure compliance and continuous improvement;
- **Ensure** an open and accessible system for reporting incidents, accidents and risk situations, analysing root causes and implementing corrective actions to prevent recurrence;
- Continuously **monitor** and **evaluate** safety performance, using specific indicators and periodic audits to identify opportunities for improvement.



Training and awareness-raising

SIT is committed to building and spreading a safety culture in which every worker is aware of his or her role in protecting health and safety at work. The company considers training and awareness-raising fundamental to preventing accidents and promoting a safe working environment.

Through specific training programmes and awareness-raising activities, SIT aims to improve employees' skills and encourage responsible and proactive behaviour in risk management.



SIT is committed to:

- **Provide** continuous and up-to-date training for all employees, adapting the training content to the specific risks and operational needs of the different company areas;
- **Promote** risk awareness through awareness-raising campaigns and initiatives that actively involve workers in accident prevention;
- **Encouraging** active participation in the culture of safety, through programmes that encourage the reporting of hazards, suggestions for improvement and the adoption of safe behaviour.





Promoting mental and physical well-being

SIT recognises the importance of the mental and physical well-being of its employees as a crucial element of a healthy and productive working environment. The company is committed to implementing policies and programmes that foster a work-life balance, reducing stress and improving overall health. Through support initiatives, training and dedicated resources, SIT aims to ensure that employees can effectively manage their professional and personal responsibilities, thus contributing to a positive and engaging corporate climate.

SIT is committed to:

- **Implement** work-life balance policies, such as flexible working hours and hybrid working arrangements, to enable employees to better balance work and personal needs;
- **Propose** programmes geared towards mental and physical wellbeing, including psychological support services, stress management and initiatives to support sporting activity;
- **Paying** attention to well-being within production plants, particularly in the context of shift work, with the aim of avoiding alienation and fostering an inclusive and motivating environment.



Constructive cooperation with workers' representatives



SIT recognises the importance of actively collaborating with employee representatives as an integral part of the health and safety strategy. The company is committed to maintaining transparent lines of communication and involving representatives in the planning and implementation of safety measures. This collaboration makes it possible to gather valuable feedback, address workers' concerns and promote a safe working environment that complies with current regulations.



SIT is committed to:

- **Establish** regular meetings with employee representatives to discuss health and safety issues, ensuring constant discussion and information sharing;
- **Include** workers' representatives in the decision-making process regarding health and safety initiatives, ensuring that their perspectives are considered;
- **Ensure** that all staff have the right to form or join organisations and to be represented by trade union bodies or other forms of representation.



Health and safety in the supply chain

SIT is committed to making health and safety a priority not only in its business operations but also in the management of its supply chain. The company works with suppliers and partners to promote and implement safe practices, ensuring that every actor involved in the production process respects high standards of safety and well-being for its workers.

SIT is committed to:

- **Assess** and **monitor** suppliers' health and safety practices, requiring suppliers to recognise worker safety and health as a fundamental requirement;
- Actively **work** with suppliers to implement improvements in working conditions and safety practices, providing support and training when necessary;
- **Promote** good labour practices in the supply chain to ensure that our health and safety standards are met throughout the supply chain, fostering a safe working environment outside the company as well.



Continuous improvement

SIT promotes a culture of continuous improvement in occupational health and safety. The company recognises that evolving regulations, technologies and best practices require a proactive and flexible approach aimed at identifying opportunities for improvement and adapting its practices to ensure employee well-being and safety at work.

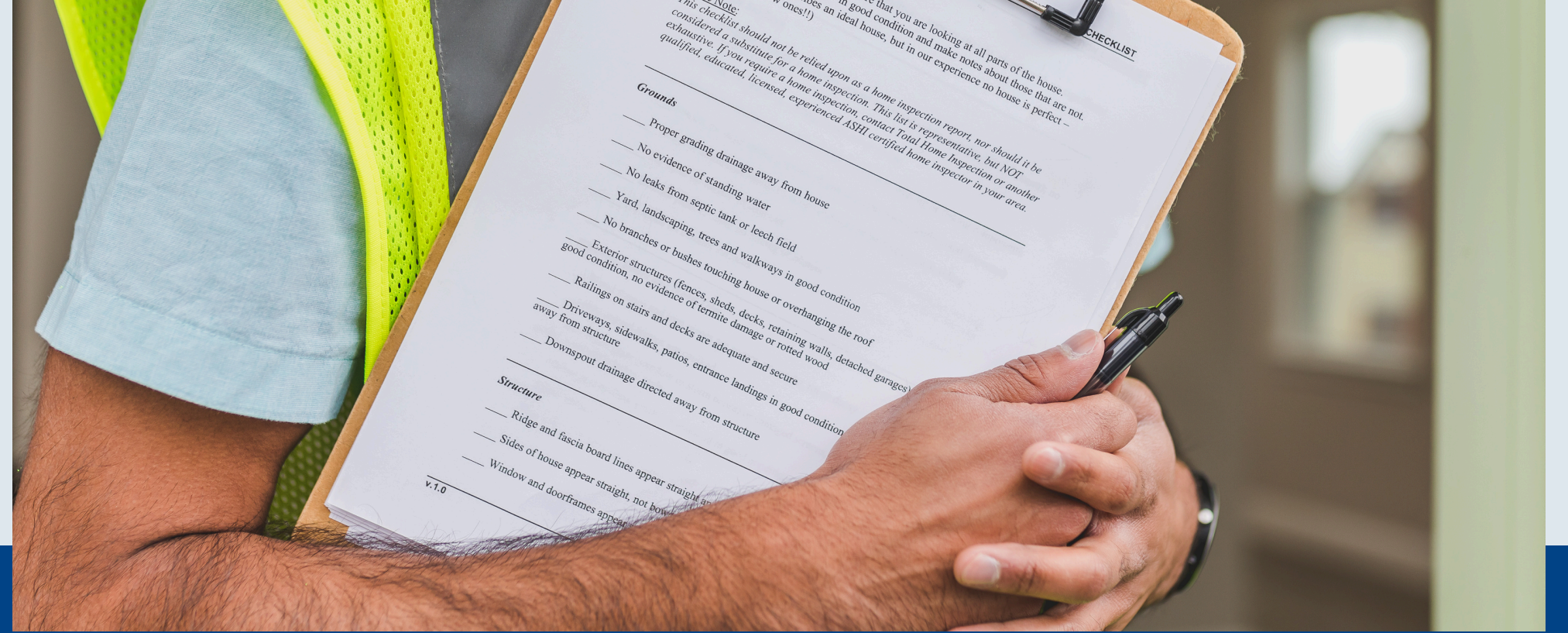


SIT is committed to:

- Continuously **monitor** and **analyse** health and safety performance, using data and feedback to identify areas for improvement and develop action plans;
- **Pursue** the goal of “zero accidents” and “zero occupational diseases”;
- **Set** clear and measurable objectives for health and safety improvement, regularly reviewing progress and adapting strategies to achieve ever higher results.



IMPLEMENTATION AND MONITORING



MONITORING

SIT believes that all stakeholders must adapt their conduct to the principles contained in this Policy and that by their behaviour they contribute to the **dissemination of a culture based on the protection of health and safety in the workplace.**

SIT undertakes to implement the activities necessary **to achieve the objectives** defined in relation to the priorities of this Policy and to periodically monitor and assess their progress.

Furthermore, SIT undertakes to ensure responsible management of the value chain, cultivating **transparent business relations**, fair and respectful of the regulations applicable in the country of operation, inspired by the principles contained in this Policy.

The Company adopts **criteria for selecting** suppliers, collaborators and partners that respect the principles and values set out. To this end, SIT carries out **appropriate monitoring activities**, and takes **specific measures** if these principles are violated, including the possible termination of the relationship.





IMPLEMENTATION AND MONITORING

REPORTING

All violations or suspected violations of this Health and Safety Policy may be reported by **all persons affected** by the principles contained herein, even anonymously, through the reporting channels that the Company has appropriately set up in the operational offices and/or according to the provisions of the Group Whistleblowing Policy. SIT follows the **principle of non-retaliation** and guarantees, in the event of any report, the **confidentiality of the identity** of the person making the report in order to prevent any form of retaliation, discrimination or any type of penalisation, in accordance with applicable regulations and national and international best practices.

SANCTIONS

The SIT Group is committed to **prevent and impede possible violations** of the Group's Health and Safety Policy and to penalising infringements or non-compliance **by all persons involved** in this policy, whether internal or external to the company.



TRAINING AND COMMUNICATION

The Company undertakes to **disseminate** and **make available this Health and Safety Policy to all stakeholders**, in order to encourage and ensure appropriate knowledge of the principles and values it contains. To this end, it undertakes to use **communication channels** and tools suitable for reaching the entire audience of stakeholders, in particular the document will be made available in its most updated version through the company intranet, for employees and internal collaborators, and the website **www.sitcorporate.it** for suppliers, consultants and business partners.



In addition, the group is committed to ensuring continuous **awareness** of the principles and values contained in this Policy, as well as to setting up **a training plan** aimed at fostering knowledge of it, in order to ensure its **proper understanding** by all its **people**.



REVIEW

With a view to continuous improvement, the Company undertakes to regularly update this Policy, taking into account advances, standards and good-practices in the field of Health and Safety.

The revision, in whole or in part, of this Policy is the responsibility of the Departments:

- **Environment, Health & Safety**
- **Human Resources**
- **Sustainability**

in cooperation with the offices and corporate structures deemed appropriate.

In addition, any updates and revisions of a substantial nature to this Policy will be subject to approval by the

Board of Directors of SIT S.p.A.

Edition	Date	Description of Changes	Issued on
1.0	18/12/2024	First Version - Approved by Board of Directors of SIT S.p.A.	18/12/2024

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