



## **QUALITY, HEALTH, SAFETY, ENVIRONMENT, SUSTAINABILITY and GENDER EQUALITY POLICY**

**ELACHEM S.p.A. is an important Italian company that operates not only domestically but also, and above all, internationally within the chemical sector and in the production and marketing of polyurethane systems applied to footwear and saturated polyester resins.**

**This Policy defines the objectives and principles of action of Elachem SpA to ensure the quality of its products and the satisfaction of its customers, the protection of workers' health and safety, the protection and preservation of the environment, the respect of sustainability criteria as well as gender equality.**

## QUALITY

From a Quality perspective, Customer satisfaction and the continuous pursuit of cost competitiveness and a profit that makes sustainable the investments required for our company's expansion and ensures an acceptable return for our shareholders and stakeholders are the priority and vital goals for the success of our Organization.

In order to achieve them effectively Elachem pursues the following strategies with commitment and consistency:

- ✓ Partnership with the Customer with the goal of pursuing continuous improvement of the products and services offered
- ✓ Product quality with the goal of “zero defects”
- ✓ *Just in time deliveries*
- ✓ Constant search for innovative and competitive solutions
- ✓ Continuous improvement of business processes
- ✓ Growth and motivation of resources with the aim of achieving effectiveness and competitiveness of activities carried out
- ✓ Collaboration and support for supplier growth
- ✓ Integrated business management system based on ISO 9001:2015, ISO 14001:2015 and ISO 45001:2023 standards
- ✓ Defining, understanding, and verifying the compliance of delivered products with Customer requirements and applicable regulations
- ✓ Assessing and minimizing the risks associated with each production process and solving any problems that, even potentially, could generate non-conformity of the products and services provided
- ✓ Focus on the growth of customer satisfaction
- ✓ Spreading the “Culture of Quality” through:
  - ongoing communication about the importance of the compliance of all production processes and activities carried out in the Organization with the requirements of the Quality Management System;
  - the active involvement of all personnel in the continuous improvement of processes and all activities carried out in the Organization in order to increase the effectiveness of the Quality Management System;
  - the systematic verification of the achievement of expected results by the Quality management system.

## HEALTH AND SAFETY

Elachem is committed to promoting and safeguarding the health and safety of workers in order to prevent occupational injuries and illnesses and promote people's well-being.

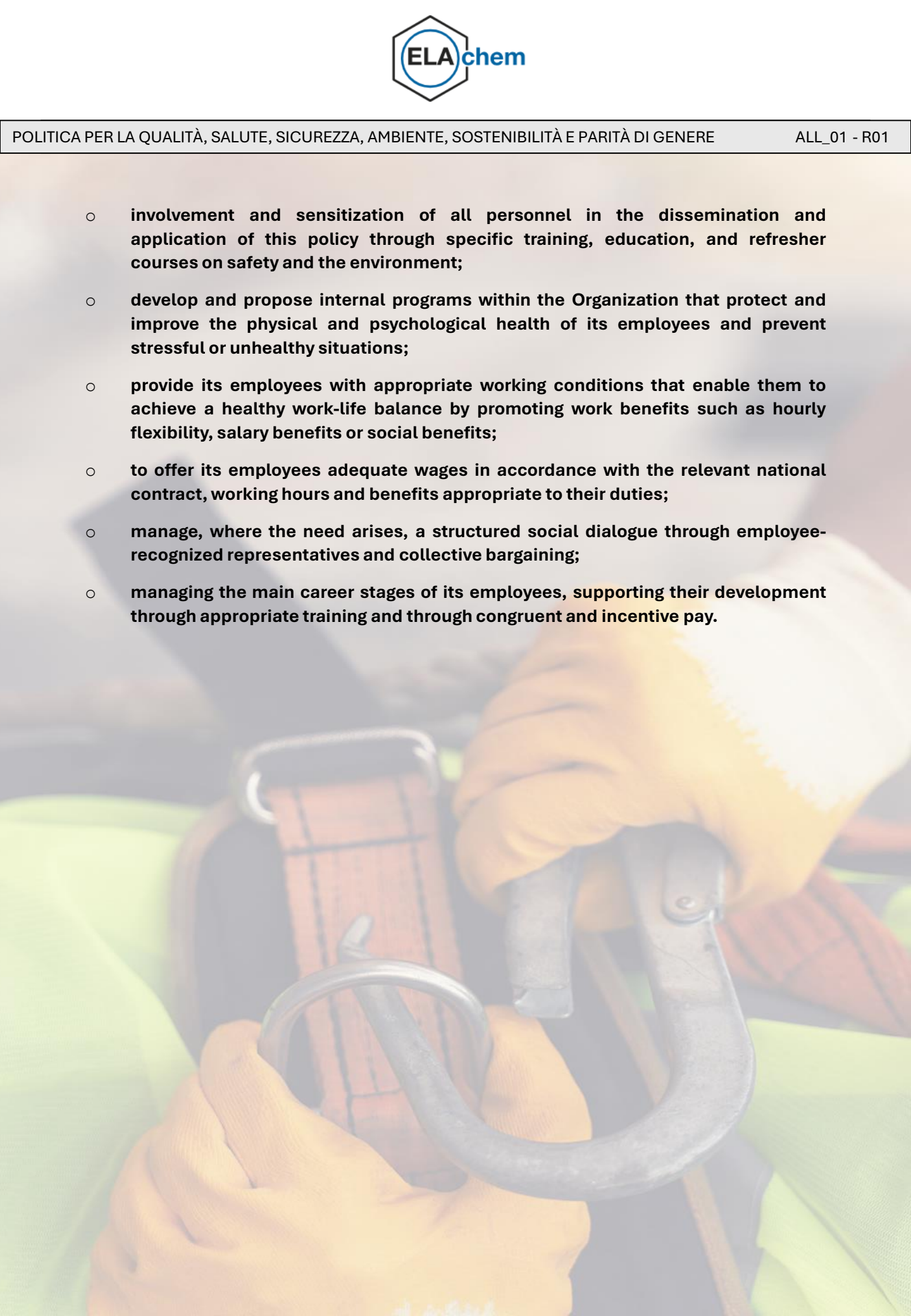
This is because it believes that the health and safety of its personnel are part of the company's assets and are values to be safeguarded at all costs and in every venue.

The Company therefore requires all personnel to ensure that company activities are carried out at all times in a manner that does not jeopardize their own and their colleagues' safety in any way.

To this end, any work carried out or intended to be carried out within the Company must always be combined with specific risk prevention activities related to it, aimed at protecting the health and safety of the personnel present in the Company, in accordance with the mandatory requirements.

In order to pursue these principles effectively, the following strategies are applied:

- preventive risk assessment of any new activity to be carried out with special reference to the health and safety of workers;
- design of any machine or plant or equipment using the best available technology and scrupulously observing the provisions of current regulations on accident prevention and worker safety;
- conducting specific courses open to all personnel involved in the use of machines, facilities and equipment, in order to make them knowledgeable about their operation, safety devices and rules of use and maintenance;
- maintenance of machinery or plant or equipment and performance of work activities in full compliance with the mandatory requirements for accident prevention;
- minimization of any and all health and safety hazards by continuously checking for any new technologies that the activities the company undertakes the work the company does;
- conducting periodic reviews of accidents, injuries, and risk situations that occurred during the reporting period to verify the effectiveness of corrective actions previously taken and the possible need for additional actions to be developed in order to achieve the goal of zero injuries;

- **involvement and sensitization of all personnel in the dissemination and application of this policy through specific training, education, and refresher courses on safety and the environment;**
  - **develop and propose internal programs within the Organization that protect and improve the physical and psychological health of its employees and prevent stressful or unhealthy situations;**
  - **provide its employees with appropriate working conditions that enable them to achieve a healthy work-life balance by promoting work benefits such as hourly flexibility, salary benefits or social benefits;**
  - **to offer its employees adequate wages in accordance with the relevant national contract, working hours and benefits appropriate to their duties;**
  - **manage, where the need arises, a structured social dialogue through employee-recognized representatives and collective bargaining;**
  - **managing the main career stages of its employees, supporting their development through appropriate training and through congruent and incentive pay.**
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- A background image showing a person wearing a high-visibility yellow safety vest and orange work gloves. The person is holding a large metal hook or shackle, which is part of a safety harness or lifting equipment. The image is slightly blurred and has a soft, faded appearance.

## SUSTAINABILITY

Elachem has also developed and integrated a Health, Safety, Environment and Sustainability Policy (hereinafter “Policy”) aiming to continuously improve its performance by integrating sustainability into business strategy and setting policies and goals.

The Policy described herein is a clear example of Elachem's focus on environmental, social and governance issues.

The purpose of this is therefore to introduce the principles and objectives that Elachem is committed to in order to operate sustainably.

This Policy and its principles recall and support the main standards and guidelines, below:

- **Sustainable Development Goals (SDGs) of the United Nations;**
- **the 10 principles of the UN Global Compact;**
- **the principles of Responsible Care, the voluntary Program to Promote Sustainable Development of the Global Chemical Industry;**
- **international standards such as ISO 45001:2023 and ISO 14001:2018;**
- **ISCC PLUS certification, which is part of the International Sustainability & Carbon International Sustainability & Carbon Certification (ISCC) scheme to ensure the sustainability, traceability and identity of raw materials used throughout the supply chain. Specifically:**
  - **promoting the use of ISCC PLUS certified raw materials in order to increase the sustainability of our products;**
  - **verifying the suppliers used and qualifying them in accordance with the requirements expressed by the ISCC PLUS scheme, consolidating the collaboration/integration relationship and optimizing communication with them;**
  - **maintaining within the Organization a collective commitment to ISCC principles and criteria through ongoing training of its Employees;**

- **promoting the professional development of its employees through inherent continuing education:**
    - ❖ **health and safety in the workplace,**
    - ❖ **the Integrated Quality, Environment and ISCC PLUS Management System,**
    - ❖ **applicable laws and regulations;**
  - **documenting, communicating and promoting its commitment to the environment, occupational health and safety, social responsibility and sustainability;**
  - **publicizing this policy through its communication channels to all stakeholders and to review it annually.**
- **All international and national laws applicable in the countries in which ELACHEM operates.**

**The Elachem Group is aware that in order to contribute to sustainable development, it is necessary to ensure the sustainability of its activities along the entire value chain.**

**For this reason, Elachem's Health, Safety, Environment and Sustainability Policy is addressed internally to its employees and externally to all suppliers, business partners and collaborators.**

**Elachem is committed to conducting all business activities in accordance with applicable regulations, directives and standards and to ensuring compliance with international and local regulations in the various countries in which it operates.**



## Social Sustainability

### **GENDER EQUALITY, HUMAN RIGHTS AND CHILD LABOR**

In particular, Elachem rejects child labour, forced labour or forced labour within its organisation and throughout the supply chain and its customers, constantly monitoring respect for human and child rights.

Listening to and paying attention to stakeholders, i.e. all stakeholders who influence and/or are influenced by Elachem's activities (e.g. employees, customers, suppliers, etc.), represents an important aspect for the Organization for the creation of shared value in the long term.

With regard to internal stakeholders, in particular towards employees, Elachem:

- assigns clear tasks and responsibilities and ensures actions aimed at improving the professionalism and awareness of staff;
- requires all personnel to comply with the relevant laws, procedures and operating instructions and company regulations;
- prevents any form of discrimination, harassment and physical, psychological and verbal abuse for all employees in the workplace;
- promotes equal treatment for people from other backgrounds and works to ensure gender equality within its context.

Towards external stakeholders (e.g. customers, suppliers, etc.), Elachem:

- implements a collaboration plan in order to identify strengths and weaknesses;
- establishes targeted actions to ensure continuous improvement;
- manages effective external communication, relating to environmental, social and governance issues;
- ensures transparency and communication with the Control Bodies.

## **Environmental Sustainability**

### **CLIMATE CHANGING**

Elachem recognizes the need to invest in the research and development of new technologies and processes aimed at mitigating the effects of climate change, reducing emissions, energy consumption and improving the energy efficiency of production processes along the entire value chain.

Elachem actively monitors the risks arising from climate change and is committed to defining appropriate mitigation and adaptation measures for its activities in all areas of procurement, production and research and development.

Elachem pursues the goal of reducing and minimizing, where possible, direct and indirect energy consumption. To this end, it undertakes to:

- develop processes that minimize both energy absorption and their emissions of any kind;
- reuse the energy dissipated from production processes for the production of additional energy that serves the operation of company production;
- promote and increase the use of energy from renewable sources;
- minimising energy consumption at the various operating sites.

### **POLLUTION**

Elachem constantly monitors its direct and indirect environmental aspects and pursues pollution prevention. To this end, Elachem undertakes to:

- use the best economically available technologies to prevent pollution of air, water and soil;
- carry out periodic monitoring of environmental aspects, such as chemical and microbiological analyses of water, controls on air pollutants and emissions.

### **BIODIVERSITY**

Elachem recognizes the importance of protecting biodiversity and ecosystems. In this regard, it undertakes to verify the presence of protected areas relevant for biodiversity at risk in all the contexts in which it operates.

It is the Organization's constant objective to consider, where necessary, the potential impacts on biodiversity of its activities, in order to implement mitigation actions aimed at minimizing their effects.



## Environmental Sustainability

### WATER RESOURCES

Elachem SpA recognizes access to water as a universal human right and is committed to preserving water resources in all its activities and areas in which it operates in line with the United Nations Sustainable Development Goals (SDGs).

The Organization is aware of the impact generated by the Group's production activities and the importance of water resources along all industrial processes, also in consideration of the growing criticalities caused by climate change (e.g. drought, desertification) and the close dependence of production sites on water supply.

The sources of water withdrawal used in the production sites are those deriving from the local water service.

Elachem aims at continuous qualitative and quantitative monitoring of the water resources used and to reduce its water footprint.

To achieve the aforementioned objectives, Elachem adopts and considers the following actions indispensable:

- reduce water consumption through the use and development of innovative systems, technologies and infrastructures;
- adopt qualitative and quantitative monitoring plans for water withdrawals/discharges;
- adequately manage the impacts generated by water discharges;
- prevent contamination of surface and groundwater;
- promoting the improvement of water efficiency in areas where it is present;
- promote the improvement of water efficiency along the supply chain;
- monitor and ensure that the water used by both employees and anyone accessing the production site complies with hygiene and health requirements.

It is the constant objective of the Organization to promote responsible behavior and consumption of water resources through specific awareness-raising, involvement and training initiatives for all personnel in order to encourage a common commitment to the protection of water resources.

## Economical Sustainability

### CIRCULAR ECONOMY

Elachem promotes, where possible and feasible, a production and consumption model based on the reuse and recycling of materials aimed at extending the life cycle of products, reducing waste and minimizing the environmental impact caused by the production and use of its products.

In this regard, Elachem undertakes to:

- carry out preventive analyses of the raw materials that can be used to produce a certain component, focusing the choice on those with a lower environmental impact;
- carry out Life Cycle Assessment (LCA) analyses to quantify the impacts on the environment that are associated with its products and their end of life;
- provide correct information to customers on the final destinations of their products, in order to facilitate the collection, reuse, recovery of products, as well as promote the correct delivery to separate collection services;
- develop technical proposals for products that can be recovered at the end of their useful life and, therefore, reused as secondary raw materials for any other purpose;
- implement sustainable packaging solutions, promoting recyclable packaging and reducing the use of single-use packaging;
- favour, where possible, the recovery rather than the disposal of processing waste;
- manage the waste generated in an optimal and efficient way, disposing of it correctly according to current legislation.

## TRAINING AND COMMUNICATION

It is Elachem's commitment to communicate and ensure the application of the Policy described therein through activities to involve and raise awareness of all personnel and the entire value chain.

Elachem's Health, Safety, Environment and Sustainability Policy is also always available to the public and interested stakeholders on the website at [www.Elachem.com](http://www.Elachem.com).

Vigevano, 2 Luglio 2024

The Legal Representative

