



## ENVIRONMENTAL POLICY

Nupi Industrie Italiane S.p.A. has long implemented, maintained and certified an Environmental Management System conforming to ISO 14001 Standard to achieve and maintain in time the improvement of its environmental performance and the satisfaction of the parties involved.

The General Direction, intending to promote the transition of the company system to the conformity with the 2015 revision 2015 of the reference Standard, is committed to:

- Define the context of the organization and the parts involved;
- Place itself in a risk based thinking vision considering risks and opportunities;
- Exercise and promote leadership at all levels of the organization;
- Draw the attention of all those working on behalf of the organization towards the importance of meeting the expectations of the parties involved and respecting the environment;
- Improve the awareness of the entire life cycle of its products;
- Promote communication inside and outside the company through appropriate plans;
- Ensure compliance with applicable laws and regulations and all agreed requirements;
- Pursue the continuous improvement of its environmental performance and the satisfaction of the parties involved;
- Prevent pollution;
- Provide a reference framework to define specific goals and targets for the environment through this policy;
- Spread the policy among its employees and all those who work on behalf of the Company;
- Ensure policy understanding and periodic review, within the management review meeting, to ensure its adequacy;
- Ensure effective internal audits to remove and, if possible, prevent any non-compliance.

### Policy involving the internal parties implicated

In order to implement the expressed commitments, the General Direction:

- Assigns clear tasks and responsibilities;
- Pursues the involvement and motivation of all workers;
- In the perspective of process approach, it emphasizes the importance of teamwork in achieving the goals set;
- Encourages risk assessment in individual processes by all function managers;
- Ensures actions aimed at improving the professionalism and awareness of all workers;
- Ensures a safe working environment;
- Encourages the signaling of areas of possible improvement of the environment and working relationships;
- Requires all workers the most scrupulous respect for the laws, procedures, relevant operating instructions and established corporate regulations;
- Evaluates and manages environmental impacts adequately;
- Limits the waste of resources in all possible cases;
- Keeps under control and optimizes its processes to limit and prevent non-compliances.



As regards the activities carried out in its production sites, the General Direction puts special emphasis on:

- Regulatory update of all workers and the timely transposition and implementation of new obligations;
- Update of environmental aspects and impacts and relevant assessments as a result of changes introduced in processes or in the territorial and regulatory reference field;
- Preventive assessment and reduction, as far as possible, of the impacts associated with new products and processes;
- Reduction of energy and resource consumption by encouraging re-use and recovery;
- Management of machines and equipment to reduce abnormal events, losses and extraordinary maintenance;
- Storage and handling of hazardous products in compliance with safety sheets and labeling instructions;
- Control of waste production, atmospheric emissions, noise
- In particular, in consideration of the results of the environmental analyzes carried out, the General Direction draws the attention to the environmental aspects detailed and evaluated therein, elaborated for each plant.

#### Policy involving the external parties implicated

To implement the expressed commitments, the General Direction:

- Monitors the company direct and indirect environmental aspects and pursues pollution prevention;
- Prevents the claims of the parties involved and manages them effectively if they occurred, identifying and implementing shared solutions;
- Uses all the necessary qualified external consultancy;
- Duly involves the company suppliers in the process of continuous improvement by providing them with the information and environmental clauses to be respected;
- Manages effective external communication regarding the environment;
- Ensures transparency and communication towards control bodies.

All employees of NUPI Industrie Italiane S.p.A. and the organizations working on its behalf are required to comply with the contents of this Environmental Policy.

Busto Arsizio, January 19<sup>th</sup>, 2017

THE GENERAL DIRECTION