



**nupi industrie italiane s.p.a.**  
società unipersonale soggetta a direzione e  
coordinamento di NUPI SPA  
Reg. Imprese- Cod. Fis. – P.IVA 03039640127  
Capitale Sociale Euro 20.010.000

Pec: [nupi.industrieit@legalmail.it](mailto:nupi.industrieit@legalmail.it)  
Web Site: [www.nupiindustrieitaliane.com](http://www.nupiindustrieitaliane.com)

## Environmental Policy

Nupi Industrie Italiane S.p.A. implemented, maintained and certified an Environmental Management System in compliance with ISO 14001 years ago to achieve and maintain the improvement of its environmental performance and the satisfaction of stakeholders over time.

Nupi General Management is committed to:

- defining the context of the organization and the stakeholders;
- implementing risk-based thinking by assessing risks and opportunities;
- exercising and promoting leadership at all levels of the organization;
- drawing the attention of all those working on behalf of the organization towards the importance of meeting stakeholders' expectations and respecting the environment;
- improving awareness for the entire life cycle of Nupi products;
- promoting communication inside and outside the company through appropriate plans;
- ensuring compliance with applicable laws and regulations and all agreed requirements;
- pursuing the continuous improvement of its environmental performance and the satisfaction of stakeholders;
- preventing pollution;
- providing a framework for setting specific objectives and targets for the environment by means of this policy;
- communicating the goals of this policy to its employees and all those working on behalf of the company;
- ensuring understanding of the policy and its regular review during the management review meeting, to ensure its adequacy;
- ensuring effective internal audits to remove and prevent non-compliances whenever possible.

### Policy regarding internal stakeholders

The Management commits to implementing the goals expressed through the following actions:

- assigning clear tasks and responsibilities;
- seeking the involvement and motivation of all employees;
- stressing the importance of teamwork to achieve the goals in a process approach;
- encouraging risk assessment in individual processes by all function managers;
- ensuring actions aimed at improving staff professionalism and awareness;
- ensuring a safe working environment;
- stimulating the reporting of areas of possible improvement regarding environment and working relationships;
- requiring all employees to comply with the laws, procedures, relevant operating instructions and established company regulations in the most scrupulous way;
- adequately assessing and managing environmental impacts;
- limiting the waste of resources in all possible ways;
- monitoring and optimizing its processes to limit and prevent non-compliances.

Regarding the activities carried out at the company production plants, the Management pays attention to:

- updating employees about new regulations and making sure of the timely incorporation and implementation of new requirements;



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- updating environmental aspects and impacts and relevant assessment following changes to the processes or regarding the relevant country regulations and general standards;
- assessing and reducing the impacts associated with new products and processes as far as possible;
- reducing energy and resource consumption, by encouraging reuse and recovery;
- managing plants and equipment, in order to reduce anomalous events, losses and extraordinary maintenance;
- storing and handling dangerous products in accordance with the indications of the safety data sheets and labelling;
- controlling the production of waste, emissions into the atmosphere and noise
- drawing particular attention to the environmental aspects identified and evaluated in detail, drawn up for each plant in the light of the results of the Environmental Analyses carried out.

### **Policy towards external stakeholders**

The Management commits to the following actions to implement the goals expressed:

- monitoring its direct and indirect environmental aspects and pursuing pollution prevention;
- preventing complaints by the parties involved and, if they shall occur, managing them effectively, identifying and implementing shared solutions;
- using qualified external expertise in all cases necessary;
- adequately involving suppliers in the process of continuous improvement by providing them with the environmental information and clauses to be respected;
- managing effective external communication in relation to the environment;
- ensuring transparency and communication to 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 Policy.

Busto Arsizio, June 14<sup>th</sup>, 2019  
The Management Board