ARGOS SURFACE TECHNOLOGIES

INTEGRATED POLICY ON QUALITY, ENVIRONMENT AND HEALTH & SAFETY

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ENTRY INTO FORCE	REV. NO.	DATE	APPROVED BY:	AMENDMENTS MADE
7 July 2025	01	27 March 2026	Andrea Maria Siano	*Scope and roles/responsibilities clarified; commitments updated and annual review and reporting mechanisms included*

1. Purpose and scope

ARGOS S.r.l., a leading national company in the coatings sector, is committed to ensuring the continuous improvement of its standards in the areas of Quality, Environment and Health and Safety for the products and services it offers, through the implementation of an Integrated Management System (IMS) that complies with the requirements of the UNI EN ISO 9001, UNI EN ISO 14001 and UNI ISO 45001.

This Integrated Policy applies to ARGOS S.r.l., all its operational units, and all persons working for the Company in any capacity: employees under all types of contract, executives, middle managers, members of the Board of Directors, external collaborators, consultants, contractors, subcontractors and third parties carrying out activities at or on behalf of the Organisation (such as visitors, maintenance staff and technicians).

This Policy applies to all operational sites managed by ARGOS S.r.l.: Cambiago (MI), Opera (MI), Calcio (BG), Imola (BO), Castenaso (BO), Valsamoggia/Monteveglio (BO), Minerbio (BO), Origgio (VA), Ciriè (TO), Borgaro Torinese (TO), Camposanto (MO), Gonzaga (MN), Montanaso Lombardo (LO), Cavenago d'Adda (LO) and Crema (CR).

The Integrated Management System is administered in full compliance with current environmental, occupational health and safety regulations and any further applicable provisions, with particular reference to the Integrated Environmental Authorisations (AIA) for the sites at Cambiago, Opera, Calcio, Imola, Castenaso and Camposanto, and the Single Environmental Authorisations (AUA) for the sites at Valsamoggia/Monteveglio, Minerbio, Origgio, Gonzaga, Borgaro Torinese, Minerbio, Ciriè, Montanaso Lombardo and Crema.

2. Objectives and General Principles of the Policy

In line with this scope of application, the definition, implementation and maintenance of this Integrated Policy for Quality, Environment, and Health and Safety aim to ensure that all business processes are carried out under conditions that both safeguard the health and safety of workers – by providing safe and healthy working conditions and preventing work-related injuries and illnesses – and minimise the impacts of its environmental aspects, so that raw materials, waste and resources used, as well as the products manufactured and services provided, comply with and meet the applicable mandatory legal requirements and other requirements defined on the basis of an analysis of the organisation's context and the needs and expectations of its workers and other stakeholders.

These considerations have led the Board of Directors of ARGOS S.r.l. to embark on a process aimed at achieving the following objectives:

1. to continuously improve the internal organisation and the methods adopted for the development of all processes, in order to enhance its performance in terms of the products supplied and services provided, as well as its environmental performance and performance in the areas of health and safety at work. Products and services are provided on an ongoing basis, including through careful analysis and monitoring of the effects of climate change caused by and experienced through business processes, within the scope of its responsibility. In this context, ARGOS S.r.l., aware of the challenges posed by climate change and in line with the objectives of the Paris Agreement, is committed to contributing to limiting global warming to 1.5°C by maintaining and improving its energy mix and energy intensity per million in turnover, compared with sector averages.

2. to ensure that the planned strategies are pursued by all employees and collaborators, motivating them and appropriately enhancing their skills and awareness through the use of welfare schemes;

3. to maintain a high level of control over business processes, whether relating to Quality (process and product/service performance indicators), Environment (Environmental Performance Indicators) or Health and Safety (indicators relating to the provision of safe and healthy workplaces and the prevention and protection against work-related injuries and illnesses), so as to continuously monitor their effectiveness;

4. to ensure the Organisation is capable of delivering high-performing products and satisfactory services, from which the Customer can benefit immediately, without the need for corrective action;

5. to manage any customer complaints and any issues relating to the environment and health and safety by analysing their causes in depth, with a view to reducing them over time;

6. to analyse and interpret the expectations and needs of customers, employees and other stakeholders in order to improve and adapt its strategic processes;

7. to acquire new customers;

8. to educate, inform and train internal staff and contractors on matters within their remit and on the concepts of Quality, Environment and Health and Safety, with a view to increasing their engagement, professional competence, awareness of the role they play and their collaboration in the development of this Integrated Policy;

9. to engage suppliers and outsourcers by establishing a partnership-based relationship aimed at achieving the objectives set out in this Integrated Policy and at developing an Environmental Sustainability Plan and a Health and Safety Improvement Plan;

10. to encourage the participation and consultation of employees and employee representatives on health and safety matters;

11. to plan strategies aimed at continuous improvement, based on feedback and the indicators generated by the Integrated Management System;

12. to carry out its business processes using methods that enable the elimination or reduction of the environmental impacts generated, thereby reducing environmental pollution, minimising resource consumption and protecting the natural environment from damage and degradation resulting from its activities, products and services.

This commitment must be reflected in the manufacture of products and the provision of services:

- by maintaining a high level of control over the indicators used to monitor business processes, with a view to achieving an ever-higher standard of quality, whilst at the same time keeping under control and minimising the production of waste, effluent and emissions, as well as the consumption of raw materials and natural and energy resources in general;

- using methods that enable the elimination or reduction of the environmental impacts generated and the associated costs;

- using methods that enable us to eliminate or reduce health and safety risks;

- in accordance with current legislation on the environment and health and safety at work, and in compliance with the requirements defined by the Integrated Management System (IMS);
  in particular, in accordance with the Integrated Environmental Authorisations for the sites at Cambiago and Opera (MI), Calcio (BG), Imola and Castenaso (BO), and the Single Environmental Authorisations for the sites at Valsamoggia/Monteveglio and Minerbio (BO), Origgio (VA), Gonzaga (MN), Borgaro Torinese and Ciriè (TO), Montanaso Lombardo (LO), and Crema (CR).

- Developing, where possible, partnerships with research institutes, universities, suppliers, outsourcers, customers and any other stakeholders.

3. Specific Commitments and Initiatives

In order to achieve the objectives set out in this Integrated Policy, the Senior Management of ARGOS S.r.l. has:

- implemented its Integrated Management System in accordance with the UNI EN ISO 9001, UNI EN ISO 14001 and UNI ISO 45001 standards, ensuring that appropriate changes are made to the plan in terms of document management and the definition of tasks, responsibilities and qualifications within the organisation. The Quality, Environment and Health and Safety System is subject to certification in accordance with the standards mentioned above by an accredited third-party body;

- trained, briefed and educated all staff through dedicated awareness-raising and training sessions relating to the Integrated Management System and the contents of this Integrated Policy; such communications and information are also provided to external collaborators and outsourcers through the provision of specially prepared documentation;

- made investments to optimise the company's workforce, premises and work areas, machinery, equipment, raw materials, and the natural and energy resources used, in accordance with applicable laws and regulations;

- undertaken programmes to improve the performance of the Integrated Management System (IMS), defining, during management reviews, the strategies to be adopted and the resources and means necessary to achieve the set objectives.

4. Responsibility and Implementation

Senior Management is committed to disseminating this Integrated Quality, Environmental and Health and Safety Policy throughout the organisation at all levels and to all staff, supporting them in implementing the principles set out above and in achieving the objectives inspired by them.

To this end, ARGOS S.r.l. clearly defines the roles, responsibilities and procedures for implementing this Integrated Policy, ensuring that:

- Senior Management provides strategic direction, allocates resources and periodically reviews the effectiveness of the Integrated Management System.

- The Employer, in accordance with Legislative Decree 81/2008, ensures the protection of workers' health and safety and the correct implementation of prevention and protection measures.

- The RSPP – Head of the Prevention and Protection Service – supports risk assessment, coordinates technical and organisational measures and promotes the adoption of safe behaviour.

- The Occupational Health Physician shall carry out health surveillance and collaborate on risk assessment and the identification of preventive measures.

- The RLS (Workers' Safety Representative) is involved in consultation processes and actively participates in measures to improve safety.

- The HSE / Environment and Safety Department should monitor compliance with legislation, manage environmental authorisations (AIA/AUA), conduct audits and ensure the implementation of improvement measures.

- All workers, including staff, contractors and suppliers, must comply with procedures, adopt safe behaviour, promptly report any hazardous situations and contribute to continuous improvement.

ARGOS S.r.l. is also committed to ensuring adequate training, information and instruction for all staff and relevant outsourced personnel, so that everyone can carry out their role competently and with full awareness. Operational and managerial responsibilities are defined and kept up to date through internal procedures, job descriptions and operational instructions consistent with the Integrated Management System.

5. Reporting Mechanisms

Those to whom this Policy applies are required to report promptly any behaviour, act or omission that may constitute a breach of this Policy. Reports are made via two complementary channels:

I. the 'PSG12_Internal and External Environmental, Health and Safety Communications' Procedure, for EHS incidents (accidents, near misses, injuries, abnormal events, environmental damage) and related operational actions/compliance measures;

II. the "Reporting Protocol" (whistleblowing), for breaches of this Policy, the 231 Model, the Code of Ethics and company procedures.

Reports must be made in good faith, be as detailed as possible, and are protected by confidentiality and a prohibition on retaliation; anonymous reporting is permitted where applicable.

The internal channels provided for under the Whistleblowing Protocol include a dedicated platform, accessible via the link https://segnalazioni.argos-st.com, as indicated on the Company's website in the Whistleblowing section, and a telephone helpline on 0532 209358 (Linguerri Law Firm). As a last resort, the external channel to the competent authority is also available, as *a measure of last resort*, as well as public disclosure via the press or online channels. For full details on the three reporting channels — internal channel, external channel and public disclosure — as well as on operating procedures, safeguards, timeframes and management criteria, please refer to the Reporting Protocol.

Reports are received and managed by the Supervisory Body, which acknowledges receipt within 7 days and provides an update on the outcome within 3 months; in the event of a conflict of interest involving the Supervisory Body, the report may be addressed to the Chairman of the Board of Directors.

It is understood that, in the event of an EHS emergency, the report must be made immediately to the Emergency Officer(s) and the Health and Safety Manager (RSPP/RSI), triggering the procedures set out in Procedure PSG12, which, in summary, provide for:

I. securing the site and containing the incident;
II. completion of the Incident/Near Miss/Accident Reporting Form (Annex 1 PSG12) and, where appropriate, the Internal Reporting Form (Annex 1/B);
III. a preliminary assessment by the RGI/RSI and, where necessary, a joint analysis with the RSPP and RLS;
IV. planning and implementation of corrective and improvement actions, with assigned responsibilities and deadlines;
V. submission of mandatory notifications to the relevant authorities and/or insurance bodies within the statutory timeframes and in accordance with the applicable authorisations.

DG/PS and RGI/RSI ensure that events are recorded and actions are traceable, coordinate measures and, where necessary, inform the Supervisory Board and/or the Authorities. All Addressees are required to cooperate by providing the requested information; obstruction or failure to cooperate constitutes a breach of this Policy.

6. Updates and Revisions

ARGOS S.r.l. undertakes to regularly review and update this Integrated Quality, Environment and Health and Safety Policy, in order to ensure its continued suitability in relation to:

- changes in applicable legislation and relevant international standards;
- changes in the Company's organisational, operational and technological context;
- the expectations and needs of internal and external stakeholders;
- the results of monitoring, control, audit and review activities of the Integrated Management System.

ARGOS S.r.l. promotes an approach geared towards continuous improvement, fostering a corporate culture based on environmental protection, the health and safety of workers, the efficient use of resources and shared responsibility across all business operations.

This Policy is subject to periodic review, at least once a year, and, where necessary, to formal updating.

Each update is approved by the Board of Directors of ARGOS S.r.l., to ensure adequate governance, effective strategic alignment and full integration with the company's objectives.

Updated versions of the Policy are made available to all relevant parties through the Company's official channels and are communicated in a manner designed to ensure their dissemination, understanding and correct application at all organisational levels.