

## MARCOLIN S.P.A. POLICY ON OCCUPATIONAL HEALTH AND SAFETY, THE ENVIRONMENT AND PRODUCT SAFETY

Document APPROVED BY Board of Directors on 08/10/2020

The Corporate Policy for Product Safety, Occupational Health and Safety and Environmental Protection specifies **the vision, core values and beliefs of Marcolin S.p.A.** (hereinafter referred to as "Marcolin" or the "Company") **on occupational health and safety, environmental and product safety issues** and aims to define the direction, principles of action and results to be achieved. It also expresses the top management's commitment to promoting awareness of the objectives, the results to be achieved, the acceptance of responsibilities and motivation among staff.

**Marcolin** deals with the study, design, processing, production, marketing and distribution of eyeglasses and sunglasses, eyeglass frames and related components and semi-finished products in metal, acetate and any other material suitable for use, as well as optical and related products and materials in general.

In line with the Code of Ethics, the Company undertakes to disseminate and consolidate **the culture of safety, both as regards the health of workers in the workplace and as regards the safety of the goods produced and marketed, environmental protection and prevention of pollution**; it also undertakes to promote risk awareness, using all necessary resources to ensure the safety and health of employees, of all those who work to achieve the Company's objectives, customers, suppliers, contractors, third party users of the goods produced and the community in which it operates, as well as to protect the environment.

For the correct management of the Company, it is essential that all those who work in the Company consider **the total compliance with all current, relevant and applicable legislative and regulatory provisions** that govern and regulate Marcolin's activities as a fundamental and indispensable element of everyone's work.

The Top Management believes it is essential that all workers are guaranteed **adequate and safe working conditions**, that **environmental protection is provided** and that **safe products** are marketed; for this reason, it is constantly involved in initiatives aimed at increasing knowledge and awareness of the risks present during the performance of work activities and for the environment.

The Company believes, in fact, that it is essential for all workers to be educated, informed and trained, as well as made aware, in order to carry out their tasks safely and to assume their responsibilities for health and safety in the workplace and in environmental matters. All those who work in Marcolin shall actively participate, each according to his/her own duties and skills, in **the achievement of safety and environmental protection objectives** so that:

- the machines used, the plants, the equipment and the workplaces are made and managed in such a way as to safeguard the health and safety of workers;
- information on company risks is disseminated to all workers;
- work activities are also carried out with the main goal of **preventing accidents, injuries and occupational diseases**;
- **the protection of the environment and the prevention of pollution in all its forms** is guaranteed;
- the goods produced and/or marketed by the Company comply with the **applicable and applied regulations in force, including technical regulations**.

Therefore, the Top Management considers it indispensable and mandatory to **comply with EU and national laws** and other laws, directives, standards and regulations in force and/or applicable that govern the protection and safety in the workplace, product safety and environmental matters, and is directly committed to doing so.

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- Top Management invites the staff to identify and promptly **report any ideas for improvement** relating to health and safety in the workplace, the safety of goods produced and/or marketed, and environmental protection.

Marcolin has always paid particular attention and sensitivity to issues relating to the health and safety of all workers and third party users of the goods produced and/or marketed and to environmental protection. In fact, the Company intends to pursue, through the best possible organisation, **a policy of risk prevention and protection** both as regards the **workplace**, and in relation to **the goods produced and/or marketed** for the benefit of all the "operators" involved, both internal and external to the Company, **as well as environmental protection**.

In order to implement this approach, Marcolin undertakes to:

- carry out its activities in compliance with current legislation and other applicable or signed legislative requirements and/or regulations, in general and in particular with regard to the safety of goods produced, health and safety at work and environmental protection
- ensure that all those who work within the Company or on its behalf consider the full compliance with all the legislative provisions that regulate and govern Marcolin's activities as a fundamental element of everyone's work;
- pursue the continuous improvement of the general measures for the protection of health and safety in the workplace and in environmental matters, also through the implementation of a suitable and effective organisational model;
- pursue the continuous improvement of aspects concerning the design, construction and functional safety of the goods produced and/or marketed;
- ensure compliance with regulatory obligations in such matters;
- ensure that workers are constantly involved, consulted, informed, trained and sensitised;
- ensure that all staff receive adequate training on their duties and the risks arising from such activities;
- control the implementation of the regulatory system in force concerning the protection of workers in the workplace, product safety and environmental matters, by means of a continuous monitoring system, ensuring their application;
- periodically review the safety policy and the Integrated Management System implemented, with particular reference to health and safety and environmental matters;
- promote the adoption of organisational and procedural solutions inspired by the *best practices* for the protection of health and safety at work, product safety and environmental matters;
- ensure the availability and suitability of protective equipment;
- inform and raise awareness among suppliers and contractors, so that they adopt behaviours, practices and procedures consistent with the principles of the Company in compliance with the provisions in force;
- prevent accidents and illnesses at work and, in any case, act to reduce their frequency and severity;
- prevent and promptly manage any type of health, safety or adverse environmental event through the application of prevention and intervention procedures;
- ensure cooperation with public authorities and control bodies;

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- carry out the scheduled maintenance of the Company's machinery and plants in compliance with health, safety and environmental requirements;
- assess in advance and work to minimise the impacts of all new activities and processes on health, safety, the environment and sustainability in general;
- plan and implement periodic meetings with the personnel in charge to disseminate the culture of safety in the workplace and products and environmental protection at all levels, and set out lines of conduct on the subject to be adopted in Marcolin's workplaces;

Each worker and collaborator must **actively participate in the growth of safety and environmental protection** in Marcolin, cooperating with the Top Management in the definition of management procedures and committing themselves both to the detection and prompt removal of non-conformities.

The Top Management is committed to promoting all forms of prevention of accidents and occupational diseases and to the **continuous improvement of management and performance regarding:**

- **health and safety**, aiming at the continuous reduction of accidents, injuries and occupational diseases;
- **the environment**, by adopting principles and behaviours aimed at reducing environmental impact and prioritising the choice of materials and products that mainly produce waste that can be recovered in terms of material or energy;

This is done in order to introduce a **constructive mindset**, within the Company, which allows it to proceed regularly in achieving the objectives set.

In addition, with a view to continuous improvement, **the objectives** that we aim to achieve are periodically defined, starting from the **general intentions** expressed in this document, and a process of continuous updating of these objectives and of the Company Policy for health and safety in the workplace, product safety and environmental matters is implemented, in order to continuously adapt them to new requirements.

The Top Management hopes to obtain the maximum contribution from all the staff for the achievement of the prefixed objectives and works to ensure that this Company Policy is disseminated through publication on the notice boards and on the company intranet and understood at all levels, as well as calling all the staff to the pursuit of the Policy itself, considering, among other things, the fact that **safety is achieved by those who perform the various activities and not by those who control.**

The Policy in question is approved by the Board of Directors with a specific resolution and disseminated among the staff, giving personal notice to all employees of its publication on the notice boards and on the company intranet and to external parties through publication on the Company's website.

The Top Management assures that it will pay the utmost attention to all suggestions, proposals and requests for clarification, whoever they may come from.

# MARCOLIN

Marcolin Spa

Società con Socio Unico

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