



**INOX  
TECH**

Heavy Wall Welded Pipes  
in Corrosion Resistant Alloys

## Major Incident Prevention Policy

APPROVED BY: <b>Seol EunCheol</b>	DATE: <b>26/07/2023</b>	Edition <b>1</b>	Revision <b>0</b>
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### REGISTRATION OF CHANGES

Ed.	Rev.	Data	Descrizione
0	0	26/07/2023	Emissione

### DOCUMENTS RECALLED

Details	Revision description
Attachment 1	Policy – system structure and principles
M105_1	Improvement plan

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Since March 2020, INOX TECH has been notified to the authorities as a plant at risk of major accident. As required by Legislative Decree 105/2015, it has consequently adopted a Safety Management System for the Prevention of Major Accidents in order to promote constant improvements in safety and to guarantee a high level of protection of man and the environment.

This management system has been integrated into the ISO 45001 certified management system.

INOX TECH undertakes and will continue to undertake to pursue the safety and health of workers, the protection of the environment and property and in particular the prevention and control of major accidents, through a specific policy which is considered as important as the more general one for health and safety.

INOX TECH in line with the provisions of Legislative Decree 105/2015, intends to pursue the following general objectives:

- comply with the legislation on the prevention of major accidents
- regularly identify and assess major-accident hazards
- increase awareness of issues relating to the prevention of major accidents of all personnel, internal and external, who work within the plant

INOX TECH S.p.A. has the specific objective of improving the behavior of both internal and external personnel operating within the plant through the use of checklists for the periodic monitoring of the operations carried out on the pickling plant, in particular those relating to handling and management of hazardous substances.

To achieve the aforementioned objectives, INOX TECH - for each point in which the Safety Management System is divided - undertakes to:

a) Organization and personnel

- allocate the necessary resources for the continuous improvement of safety conditions
- identify the skills and experience necessary for the definition of roles and responsibilities of personnel involved in safety management at each level of the organization
- determine staff and contractor training needs
- promote staff awareness and involvement to disseminate an operating culture based on responsible safety behavior on the part of workers, as well as suppliers and external companies working on the site
- inform, educate and instruct personnel to increase knowledge and awareness of risks in order to avoid errors that can be the initiating causes of accidents and adopt suitable actions and behaviors to minimize their effects
- ensure that personnel are adequately trained and trained to deal with emergency situations

b) Identification and assessment of relevant hazards

- apply the procedures for the systematic identification of the significant dangers deriving from the normal or extraordinary exercise of the activity
- evaluate the effects on the security of operations, activities and services performed by third parties

c) Operational control

- involve and motivate all personnel identified for the inspection and control of the pickling plant, within the scope of their responsibilities
- adopt and apply instructions for the operation of the plant in safe conditions, also in the maintenance phases
- develop procedures and work instructions in collaboration with the personnel who will have to follow them
- extend maintenance programs and periodic checks of the systems and surveillance of the correct application of the procedures and work instructions
- implement appropriate verification and control methodologies of safety-critical components and analyze and record their failures to identify possible improvements

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d) Modifications and design

- apply suitable procedures for identifying the level of criticality of the changes and for analyzing the corresponding implications on safety
- make all personnel responsible for making changes to systems, equipment, working methods, only if previously and adequately evaluated, authorized and documented

e) Contingency planning

- make the application of the Internal Emergency Plan effective through education, training and exercises on the identified accident scenarios
- pursue collaboration with the local authorities and coordination with the institutions in charge of managing emergencies outside the plant, assessing the needs of the community on issues of prevention and control of major accidents

f) Performance control

- define measurable parameters and indicators in the context of the Prevention of Major Accidents and pursue actions to achieve performance improvement objectives
- analyze accidents, near misses and anomalies to correct any deficiencies in the Management System and to increase knowledge

g) Control and review

- program and plan audits and inspections, evaluate the results and disseminate the results among the interested parties
- highlight, on the basis of observations and records of appropriate indicators of the Management System, the positive and efficient factors and those that demonstrate deficiencies
- promote checks and verifications of the implementation of the identified corrective actions
- ensure compliance with the times established for checks and controls

To obtain the following objectives, INOX TECH– for each point in which Safety Management System is divided – undertakes to pursue all the point details in **attachment 1 – System structure and principles** explicating annually through **M105\_1 Improvement Plan** the actions that intend to take

It is the responsibility of the Plant Manager to supervise compliance with the Major Accident Prevention Policy.

The Manager of the plant informs the workers and consults their representative in the definition of the Policy and in the implementation, verification and modifications of the Safety Management System, according to the procedures established by Legislative Decree 105/2015.

The Policy is known and disseminated to all personnel and is made available to the public for consultation: it is displayed in the offices and in the pickling department and shared through the database and the company intranet.

The Implementation Program of the Safety Management System for the Prevention of Major Accidents is an integral part of the Accident Prevention Policy Document.

The reference standards referred to in this document (Legislative Decree 105/2015 and UNI ISO 45001) are available for consultation in the electronic version on the company server at the following address P:\Dati\Legislazione

The same rules can be consulted in paper format at the HSE office

SIGNED BY MANAGING DIRECTOR

*Seol EunCheol*