

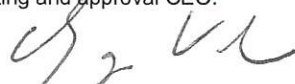
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1	All employees
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Amendments to the latest edition:

N.° of Amendment	Date of issue	Description of the amendment and paragraph references.
0	08/02/02	Issuance
1	12/07/02	Revision of paragraph 3.3
2	10/01/03	Revision of paragraph 3.3
3	12/01/04	General revision of paragraph 3.3, par. 3.2
4	18/02/05	Quality/ Environment Intergration
5	10/05/07	General revision
6	08/01/08	Single level priority revision
7	04/11/08	RGQA replaced by DGQA
8	31/10/09	DGQA replaced by DQAS; Safety policy added.
9	15/03/10	General revision
10	23/09/14	General revision
11	06/06/17	General revision
12	19/06/18	Amendment with indications of new legislations ed.2015

Drafting and approval CEO: 	Date: 19/06/18
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1 Purpose

This document represents the organizational policies expressed by the Direction, drafted for the purpose of defining the activities and directives that shall guide the organization of company Thermokey S.p.A.

2 References.

Reference	Title
Norm. UNI EN ISO 9001:2015 & 14001:2015 cap. 5.2	<i>Policy Enviromental Policy</i>
Norm. OHSAS 18001:2007 cap. 4.2	<i>Health and Safety Policy</i>

3 Organizational policies

3.1 Transmission of policies at the various levels

The Direction believes that a precise awareness of the organizational objectives transmitted to the various managers increases the possibility of achieving them and encourages the creation of a path of continuous and shared improvement. To this end, meetings that aim to raise awareness are organized and involve personnel in the directional policy. The Direction shall also make publicly available the main points related to the Quality / Environment / Safety policies (par. 3.3).

3.2 Right priorities

The Direction considers maintaining the process of continuous improvement of the organization a priority and shall particularly focus on reducing inefficiency and improving customer satisfaction. Any reduction in company inefficiencies, from needless handling of material to the expenses of non-quality management, results in reduced costs, increased production capacity, reduced delivery times and improved overall performance. The choice to maintain the quality system certified according to the ISO 9001 standard is consistent with the awareness that process monitoring brings advantages in the services and products offered to the customer.

The Direction is committed to manage the organization with due attention to safety aspects and with respect to the environment. In line with the concept of an ethical company, the environmental system has also certified according to the UNI EN ISO 14001 standard. Such system has been integrated with the safety part according to the OHSAS 18001: 2007 standard to ensure adequate control over the safety and health of workers and personnel who access their sites, also in compliance with mandatory regulations. In this document, Thermokey's guidelines are listed in general, and are to be read jointly with the individual objectives set at each company level.

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3.3 List of priorities

1. ATTENTION TO THE SAFETY AND HEALTH OF WORKERS AND OF EXTERNAL PERSONNEL

- IMPLEMENTATION OF ALL MEASURES IN ORDER TO PREVENT INJURIES AND HARM TO WORKERS AND EXTERNAL PERSONNEL AND COMMITMENT TO THE CONTINUOUS IMPROVEMENT OF HEALTH AND SAFETY AT WORKPLACE
- TRAINING AND RAISING AWARENESS AMONG THE PERSONNEL ON THE CORRECT USE OF THEIR WORKING INSTRUMENTS AND OF THE PPE IN USE AND ENCOURAGING THEM TO PROMPTLY REPORT ANY DEFICIENCIES AND MALFUNCTIONING TO THE MANAGERS
- COMMIT TO MAINTAIN ALL WORKING AREAS IN ORDER AND CLEAN AND ENSURING THAT THE ESCAPE ROUTES ARE MAINTAINED EFFICIENT AND FREE
- PROVIDING VISITORS WITH INFORMATION ON THE RISKS PRESENT IN THE COMPANY

2. WINNING CULTURE

- ALIGNMENT: COMMON VALUES. MEANING SPEED IN UNDERSTANDING AND COMMUNICATING
- INVESTING ENERGY INSIDE THE ORGANIZATION IN ORDER TO PROMOTE INNOVATION. INCREASE THE NUMBER OF PEOPLE THAT ARE PREPARED TO ACT ONCE INPUT IS RECEIVED. TIME SPENT FOR INTERVENTION, TIME FOR CONVINCING, TIME TO OVERCOME THE DEFENCES OF THOSE WHO HOLD BACK, DELAY TIME, IS TIME THAT CAN KILL
- RESULTS MEASUREMENT: IF YOU DON'T MEASURE AND COMMUNICATE, YOU CANNOT IMPROVE AND PROJECTS FADE AWAY
- DISCIPLINE: SHARED VALUES RESULT IN A COHERENT AND EXPECTED CONDUCT
- SELF-ORGANIZED LEARNING: THROUGH CONTINUOUS IMPROVEMENTS MADE IN THE FIELD BY THE WORKING GROUP

3. IMPROVEMENT OF CUSTOMER SATISFACTION

- PAYING MAXIMUM ATTENTION TO THE MARKET REQUIREMENTS AND RESEARCHING FOR "PRODUCT SOLUTION" / "TARGET PRICE SOLUTION"
- ENHANCING SERVICE TO THE CUSTOMER (USE OF APPROPRIATE SOFTWARE PACKAGES)
- DEMONSTRATING MAXIMUM SENSIBILITY TOWARDS CUSTOMER'S REQUESTS

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- DEMONSTRATING EXCELLENT QUALITY

4. OPTIMIZATION OF COSTS AND OF CONSUMPTION

- IMPLEMENTATION OF A STRICT METHODOLOGY IN PURCHASING MANAGEMENT.
- CONSTANTLY PURSUING THE OBJECTIVE TO REDUCE INTERNAL DEFECTS AND COMPLAINTS, BY INVOLVING AND GIVING RESPONSIBILITY TO THE OPERATORS TOWARDS THE SOLUTION
- MANAGING NATURAL RESOURCES RATIONALLY AND SUSTAINABLY, ENHANCING THE EMPLOYMENT AND REDUCING WASTE.
- OPTIMIZING THE USE OF ENERGETIC RESOURCES, OF RAW AND AUXILIARY MATERIALS

5. RESPECT FOR THE REGULATIONS

- FOLLOWING APPLICABLE LAWS, REGULATIONS AND NORMATIVE ON PROCESSES AND PRODUCTS
- COMMIT TO DEVELOP AND APPLY INTERNAL PROCEDURES AND STANDARDS WHERE SUCH REQUISITES ARE NOT PRESENT

6. MONITORING PROCESSES IN ORDER TO ACHIEVE ORGANIZATIONAL IMPROVEMENT

- ALIGNING THE ORGANIZATION THROUGH THE SHARING OF COMMON VALUES
- IDENTIFYING THE CRITICAL ISSUES RELATED TO THE SAFETY AND HEALTH OF WORKERS AND MONITORING THE PERFORMANCE
- STORING, TRANSPORTING AND DISPOSING OF THE RESIDUES OF PRODUCTION ACTIVITY IN SUCH WAY IN ORDER TO PROTECT THE ENVIRONMENT, THE HEALTH OF THE EMPLOYEES AND OF THE PUBLIC
- MONITORING AND EVALUATING THE EFFECT OF OWN ACTIVITIES ON THE ENVIRONMENT
- CONSIDERING, WHEN PROJECTING NEW PRODUCTS AND PROCESSES AND WHEN INTRODUCING INNOVATIONS, THE ENVIRONMENTAL IMPACT SO AS TO MINIMIZE EFFECTS USING THE BEST AVAILABLE AND ECONOMICALLY FEASIBLE TECHNOLOGIES
- FAVOURING THE RATIONALIZATION OF INFORMATION AND ITS FLOW IN THE COMPANY CONTEXT

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- CONSTANTLY REVIEWING CYCLES AND PRODUCTION PHASES
- CLEARLY DEFINING ROLES AND RESPONSIBILITIES

7. DEVELOPMENT OF A TRAINING PLAN FOR THE PERSONNEL IN ORDER TO ACHIEVE APPROPRIATE SKILLS FOR EACH TASK

- DESIGNATING ADEQUATE HUMAN AND FINANCIAL RESOURCES TO THE DISSEMINATION OF THIS POLICY AND ALSO TO THE ACHIEVEMENT OF OBJECTIVES, TARGETS AND OF THE QUALITY PROGRAM FOR THE ENVIRONMENT AND SAFETY
- IDENTIFYING THE TRAINING NEEDS OF EACH INDIVIDUAL IN RELATION TO THEIR FUNCTION
- DEVELOPING THE COLLABORATION AND AWARENESS OF THE MANAGERS FOR THE DEFINITION OF NECESSARY RESOURCES TO REACH OBJECTIVES
- CREATING THE PATHS THAT LEAD TO PROFESSIONAL GROWTH

8. ATTENTION TO MAINTAINING TURNOVER IN LINE WITH BUDGET

- CONSTANTLY MAKING MARKET ANALYSIS
- DEVELOPING / OPTIMIZING THE PRODUCT RANGE AND ALSO AFTER-SALE SERVICES TO THE CUSTOMERS

9. CONTEXT AND INTERESTED PARTIES

- TAKING INTO CONSIDERATION OF THE EVIDENCE THAT EMERGES FROM THE ANALYSIS OF THE CONTEXT AND OF THE INTERESTED PARTIES
- TAKING INTO CONSIDERATION OF THE EVIDENCE THAT EMERGES FROM THE PROCESS RISK ANALYSIS