ODE S.r.l. is committed to maintaining and improving its current Integrated Environment and Safety Management System compliant to standards ISO 14001, BS OHSAS 18001 and ISO 45001, in consideration of fundamental principles of respect for the environment and safety in the workplace, fully aware that a responsible economic strategy aimed at environmental and safety issues in its activities is essential for business success and customer satisfaction. The commitment of ODE S.r.l. translates into developing and implementing an Environmental, Health and Safety Management System through the active involvement of the entire corporate structure so that it participates, according to its duties, in achieving the identified objectives and promoting the dissemination of a real culture of safety at work and improvement of environmental performance.

The top management declares a commitment by ODE S.r.l. to:
- Guarantee that its activities are carried out in compliance with applicable provisions of law;
- Dispose of necessary financial resources to improve environmental and work conditions;
- Manage business processes effectively and efficiently;
- Minimize the risks and environmental impacts of its activities;

ODE S.r.l. Italia, in pursuing continuous improvement, undertakes to achieve the above stated goals through the following listed actions and principles:
- compliance with legal obligations and other commitments entered into by the organization;
- ensuring that the risk deriving from the activities carried out is the minimum reasonably achievable with a study and verification by the figures involved in the choice of the best and most feasible prevention and protection measures;
- the creation of a support figure (ASPP) to the structure already present to guarantee checks and verifications of the correct application of the SGSA and a support to the workers in the application of the same;
- Identification of feasible and measurable objectives, verification of their achievement and implementation of necessary corrections and integrations;
- engagement, sensitization and training of personnel, to raise awareness of the effects of conduct regarding issues relating to the environment and safety;
- implementation of every effort in organizational, operational and technological terms to prevent water, air and soil pollution;
- minimization of the consumption of energy, water and raw materials and of the production of waste, favour where possible recovery;
- promotion of adequate safety conduct by suppliers;
- assessment and the implementation of measures regarding accident prevention, occupational diseases, hygiene and safety in the workplace, fire, direct and indirect environmental and safety impacts and emergency management;
- assurance that this document is available to the public and interested parties to encourage their involvement with reference to the aforementioned objectives.

Guiding Principles of the Safety and Environment Policy

- Accidents and injuries can be predicted and avoided.
- The safety and the protection of the environment are a responsibility of all the ODE hierarchical structure.
  1. The members of the hierarchical structure enforce EHS’ procedures and instructions, the members must analyze every accident or possible accident and injury;
  2. The members of the hierarchical structure are committed to monitor and continually improve all the activities to help protecting the environment and preventing/reducing any form of pollution;
  3. EHS’ audits and inspections are a source of improvement.
- You are responsible for your safety and for the protection of the environment.
- You are to stop a job or to refuse it if it is dangerous, if it cannot be done in safety, or if it can compromise the environment.
- Employees must immediately report any accident, even if negligible.
- All incidents must be analyzed in order to define preventive and corrective actions.
- All the efforts done to ensure the safety and the protections of the Environmental will lead to results.
- The Managers must be 100% committed to Safety and Environment:
  1. They set high goals aimed at continuous improvement.
  2. They form and empower all the people they work with.

Date: 29/03/2019
Signature: [Signature]