

OCCUPATIONAL HEALTH AND SAFETY AT UNIPOL GROUP

Dicembre 2022

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1. Activities on Occupational Health and Safety/area at Unipol Group

Unipol Group has formalized since 2016 the establishment of the Occupational Health and Safety Management System inclusive of the Group's Health and Safety Guidelines and intended for all employees of the Group.

As stated in the Group Guidelines/Policy, Unipol Group guarantees:

- Compliance with applicable current legislation on Occupational Health and Safety including non-mandatory (e.g., technical standards and best practices).
- The commitment to continuous improvement in performance and results.
- The commitment to promoting a culture of safety for people working at and on behalf of the Group.
- The safeguarding of the safety of its employees, workers of third-party suppliers, guests and visitors.
- The participation of all employees also through their duly elected representatives in collaboration with Trade Unions and trained in line with the relevant provisions in Italian legislation (e.g. State-Regions Agreement, H&S Decree 81/2008, ...)
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The management system designed in line with the requirements of the OHSAS 18001:2007 standard has been aligned with the UNI ISO 45001:2018 standard and updates are in the phase of progressive implementation.

On a periodic basis, at least annually and in line with obligations under the relevant national regulations, the Group reviews the performance of the management system and defines improvement objectives and action plans for the following year.

2. Occupational Safety Management System

The Group's management system is described in the manual and has been structured in line with the contents of the UNI ISO 45001:2018 standard and incorporates the principles of continuous improvement.

From the Occupational Safety Guidelines descend the following macro-components regulated in the OHS Management System:

- Description of the purpose and scope.
- Analysis of the organization's context from which stakeholders and risks and opportunities are highlighted.
- Role of corporate leadership and involvement of all employees; in particular, it is remarked that:
 - o The Group organizational model provides for the centralization of certain functions for the benefit of Group's companies. Consistent with this Group organizational structure, the Employers make use of Managers specifically delegated with particular regard to relevant areas in terms of occupational safety management. The delegates identified are endowed with specific organizational powers of management and control, financial and autonomy as well as the requirements of professionalism and experience to carry out the role.
 - o Employees are involved directly or through their Representatives (explicitly provided for in the Italian national legislation, for effective implementation of the system) through information conveyed through the company intranet, questionnaires and as part of training activities.

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- Planning:
 - o Following the context analysis, strengths and weaknesses as well as risks and opportunities regarding OHS are identified, enabling the proper identification of resources to be deployed for compliance with current regulations as well as the organization's objectives.
 - o Stakeholders and their expectations have been identified.
 - o Insight into relevant regulations and determination of how to continuously monitor updates impacting the entire scope of application (both geographic and Member Companies).
- Support:
 - o Identification of both material and human resources required for the effective application of the system, the skills expected and those possessed, with consequent training gaps to be met.
 - o Regulation of documentation, information and training methods relating to the personnel concerned (internal and external to the organization).
- Operation management:
 - o Operational activities resulting from the risk assessment carried out on the basis of an internal procedure formalized and signed directly by the Employer (identified by the BoD) are carried out in this area. The main areas of intervention concern:
 - Formalized risk assessment and identification of preventive and protective interventions as well as improvement plans for each site of the Group.
 - Emergency planning and management by drafting specific emergency plans and identifying specific emergency teams periodically engaged in training and education.
 - Determination of the information necessary for the effective management of procurement under Contracting, based on an assessment of the technical and professional suitability of suppliers, the provision of adequate risk information, and the promotion of coordination in the case of potential interferences.
 - Management of personal protective equipment and auxiliary devices based on the findings of risk assessment and evidence gathered during health surveillance or emergency management planning.
 - Management of training, based on compliance with regulatory requirements and with the aim of generating adequate awareness and competence on the part of all figures involved in safety management.
- Performance evaluation:
 - o In this context, the various forms of verification present are studied in depth in order to identify and correct any non-conformities, identify areas for improvement and ensure the effective application of the Management System; particularly:
 - Key Performance Indicators are periodically analyzed in all processes of the system such as specific controls are stated.
 - Internal audits carried out by the Prevention and Protection Service through periodic inspections at the company's premises with the support of specific checklists to verify the compliance of work environments. Following these inspections, the site improvement plan is scheduled to be updated.
 - Through the assignment of special tasks to external individuals with specific experience and expertise based on the areas of in-depth study, specific verification activities are carried out on the level of application of system processes.
 - Health surveillance makes it possible to monitor and prevent the effects on the health of all employees, and on an annual basis, the outcomes of such surveillance are reanalyzed to identify possible improvement actions.
 - Injuries, accidents and near misses are investigated on the basis of specific system procedure with the aim of identifying and analyzing the reasons for them, going back to the root causes and identifying possible remedial and if possible preventive actions.

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- On a periodic basis, the performance of the management system is shared through the Annual Safety Meetings required by Legislative Decree 81/2008 as well as through special in-depth meetings with the Workers' Safety Representatives.
- Periodically, usually annually, the performance of the system is analyzed within a Periodic Meeting attended by leadership functions, also because of the guidelines received from the Employers.
- On the evaluation of the performance of the service provided for the Group Companies:
 - The performance of the management system is periodically audited by the Supervisory Board under Legislative Decree 231/2001 as well as by Internal Audit reporting directly to the BoD.
- Improvement:
 - Improvement actions resulting from the verification and investigation activities are addressed in a structured manner to the relevant internal functions for appropriate improvement actions.

For the purpose of a summary graphic representation of the above, it is shown how the processes of the Safety Management System apply to the Deming cycle:



