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## MAJOR ACCIDENT PREVENTION POLICY

*(Art. 14 of Legislative Decree No. 105 of 26 June 2015)*

Alma Petroli S.p.A., operating in the bitumen production market through its Ravenna Refinery, considers the protection of employees, the public and the environment to be its primary objective. To this end, the Company has obtained ISO 45001 Occupational Health and Safety, ISO 9001 Quality and ISO 14001 Environmental certifications and is committed to maintaining them by implementing all possible measures within its organisation.

The Management of Alma Petroli S.p.A. is aware that hazardous substances and processes associated with major accident risks are present in its production activities. Consequently, the Ravenna Refinery is subject to the requirements of Articles 13 (Notification), 14 (Major Accident Prevention Policy) and 15 (Safety Report) of Legislative Decree No. 105/2015, as amended.

The Company's Management is therefore committed to operating in a manner that ensures the safety of its employees, customers, contractors and all persons living in the vicinity of the Refinery, preventing the occurrence of major accidents and mitigating their potential consequences should they occur.

To achieve these objectives, Alma Petroli S.p.A. has adopted the following general principles:

- Minimise, as far as reasonably achievable according to the current state of knowledge and technology, the risk of major accidents, understood as the combination of the probability of occurrence and the severity of consequences.
- Ensure compliance with all applicable laws, regulations, specifications and recognised national and international good engineering practices.
- Maintain continuous monitoring of legislative and regulatory developments in the field of safety and promptly comply with new requirements.
- Demonstrate a constant commitment to protecting safety, health and the environment towards both Authorities and the public.
- Design and operate plants and storage facilities according to high standards of quality, safety and environmental protection, with the aim of reducing environmental impact through the control of energy consumption, emissions and waste generation.
- Ensure the operation and maintenance of plants and storage facilities through adequately trained and qualified personnel, fully aware of the potential risks associated with the activities performed and capable of responding appropriately in emergencies in accordance with the procedures established in the Internal Emergency Plan.
- Implement monitoring procedures to verify the implementation of this Policy, including periodic audits aimed at assessing the effectiveness and adequacy of the measures adopted for emergency management.

- Establish measures to ensure that all companies working on behalf of Alma Petroli S.p.A. adopt behaviours, practices and procedures consistent with the principles defined in this Policy.
- These principles are implemented and monitored through the commitment to maintain and continuously improve the Safety Management System for the Prevention of Major Accidents (SMS-PMA), as required by Article 14 and in accordance with Annexes 3 and B of Legislative Decree No. 105/2015, as amended.

A detailed and comprehensive description of the SMS-PMA is provided in the Integrated Management System Manual for Quality, Environment, Occupational Health and Safety, and Major Accident Prevention, where each element of the SMS-PMA is fully developed and described, together with references to the documented procedures necessary for its implementation.

The Manual refers both to the specific SMS-PMA procedures and to the procedures of the Quality, Environmental and Occupational Health and Safety Management Systems on which the Integrated Management System is based.

Alma Petroli S.p.A. has structured its SMS-PMA as follows:

### **1. Organisation and Personnel**

Based on the principle that safety can only be achieved through the involvement, awareness and competence of all company personnel involved in safety management, including all refinery employees, Management has defined:

- Roles, responsibilities and authorities;
- Competency requirements for each organisational role;
- Training, information and awareness programmes;
- Documented procedures for personnel management and internal communication.

The SMS-PMA is organised through activity planning and the implementation of documented procedures and operating instructions referenced within the system.

### **2. Identification and Assessment of Major Hazards**

Documented procedures have been established to identify and assess major hazards arising from both routine and non-routine activities and to evaluate their probability and potential consequences, with the objective of minimising and controlling major accident risks.

### **3. Operational Control**

To ensure that plants and storage facilities are designed, operated and maintained in accordance with quality, safety and environmental protection standards, documented procedures and operating instructions have been established to ensure the safe management and control of activities and business processes.

### **4. Management of Change**

Technical, organisational and procedural changes that could constitute a critical factor in the prevention of major accidents are analysed, monitored and verified throughout all stages, from the initial concept through to final implementation and commissioning.

For this purpose, procedures are adopted and applied for planning modifications to existing plants and storage facilities, as well as for the design of new plants, processes or storage facilities.

### **5. Emergency Planning**

To respond effectively to potential emergencies and minimise their impact on people, the environment and facilities, Alma Petroli S.p.A. has established a documented Internal Emergency Plan, periodically tested and based on foreseeable accident scenarios.

The Plan provides personnel with an operational tool for classifying potential emergency situations and managing them appropriately, in coordination with both internal and external stakeholders. This objective is achieved through a structured planning process that assigns the responsibilities, tasks and decision-making powers necessary for the implementation of the Plan.

## **6. Performance Monitoring**

To verify the achievement of safety objectives and, more generally, to assess the performance of the SMS-PMA, procedures have been established and implemented governing:

- Periodic management review of the system;
- Analysis of performance indicators;
- Assessment of accidents and near misses;
- Management of non-conformities;
- Corrective and preventive actions;
- Safety audits and inspections.

## **7. Monitoring and Review**

Periodic monitoring of the effectiveness of the SMS-PMA is carried out through safety audits aimed at verifying the achievement of the objectives established by this Policy.

Furthermore, to ensure continuous control of SMS-PMA performance, the Site Operator periodically reviews the adopted system in order to ensure its ongoing suitability, adequacy, efficiency and effectiveness in meeting the established objectives.

To ensure the continuous improvement of the SMS-PMA, Alma Petroli S.p.A. is committed to:

- Ensuring that employees at all levels understand the importance of implementing the principles set out in this Policy.
- Continuing the study and development of procedures aimed at improving safety.
- Optimising activities through continuous review and control.
- Revising the system whenever deficiencies are identified as a result of unforeseen hazardous events or occurrences.
- Continuing personnel information, education and training as an integral part of company operations.
- Allocating resources both to improve system management and to optimise facilities in order to reduce environmental impact and enhance safety.

**The Chief Operating Officer**

**Pietro Scala**