Polimeri Europa

San Donato Milanese, 01.09.2008

HSE/PE-112 GUIDELINES

GUIDELINES ON SAFETY, HEALTH, ENVIRONMENT, PUBLIC SAFETY AND SUSTAINABILITY

This document is available to all employees on computer medium and in protected format.

DIRECTOR
QUALITY, HEALTH, SAFETY AND ENVIRONMENT
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(Signature on the Italian original)

This document is translated from the Italian original
[In the event of discrepancy or inconsistency between the Italian and the English versions, the Italian will prevail]

TABLE OF CONTENTS **page**

1. SCOPE

These Guidelines establish the safety, health, environment, public safety and sustainability criteria to be adopted.
Polimeri Europa S.p.A. pursues the priority aim of guaranteeing the safety and health of its workers, the community, contractors and clients, safeguarding the environment, ensuring public safety and sustainability.

2. FIELD OF APPLICATION

These guidelines apply to the activities of Polimeri Europa S.p.A. and its directly and indirectly controlled companies in Italy and abroad.
The field of application are the Safety and Environment Management systems implemented at all Polimeri Europa plants in Italy and abroad.
These guidelines supersede the previous Guidelines HSE/PE-112 of December 2002.

3. REFERENCES

- D.Lgs.81/08 “Testo Unico sulla Salute e Sicurezza sul Lavoro”.
- D.M. 09/08/2000 “Linee Guida per l’attuazione del sistema di gestione della sicurezza”.
- D.Lgs 334/99 e sue modifiche ed integrazioni, “Attuazione della direttiva 96/82 CE relativa al controllo dei pericoli di incidenti rilevanti connessi con determinate sostanze pericolose.
- D.M. 09/08/2000 “Individuazione delle modificazioni di impianti e di depositi, di processi industriali, della natura o dei quantitativi di sostanze pericolose che potrebbero costituire aggravio del preesistente livello di rischio”.
- DM 16.03.98: “Modalità con le quali i fabbricanti per le attività industriali a rischio di incidente rilevante devono procedere all'informazione, all'addestramento e all'equipaggiamento di coloro che lavorano in situ”.
- D.Lgs.152/06 Norme in Materia Ambientale.
- D.Lgs. 216/06 2Attuazione delle Direttive 2003/87 e 2004/101/CE, in materia di scambio di quote di emissioni dei gas ad effetto serra nella Comunità, con riferimento ai meccanismi di progetto del protocollo di Kyoto”.
- D.Lgs. 4/08 Ulteriori disposizioni correttive ed integrative del decreto legislativo 3 aprile 2006, n. 152, recante norme in materia ambientale.
- Current law on Health, Safety and Environmental questions.
- Circular letter ENI n.225 dated 28th june 2006 “ Linee guida in materia di Sicurezza, Salute, Ambiente e Incolumità Pubblica.
- ENI S.p.A. doc. “Modello di Sistema di Gestione per la Tutela della Salute, Sicurezza, Ambiente e Incolumità Pubblica” .

- Circular letter Eni n.253 dated 29th January 2007 – Modello di Sistema di gestione HSE 2007.
- Circular letter ENI n.. 254 dated 29th January 2007 " HSE Technical Audit ".
- Circular letter ENI n.255 dated 14th february 2007" Sistema degli Indicatori Guida di Area HSE".
- Circular letter ENI no. 168 dated 19th january 2005 "Industrial hygiene, health prevention and protection at the workplace".
- Circular letter ENI no. 273 dated 05th july 2007 " Sostenibilità".
- Company Circular no. 61 dated 13th july 2007 "Sostenibilità".
- Company Circular no. 74 dated 20 th december 2004 "Pianificazione di Sostenibilità".
- Company Circular no. 75 dated 13th july 2007 "Controllo di Sostenibilità".
- Company Procedure no.78 dated 08th february 2008 "Elaborazione, Autorizzazione, Emissione, Archiviazione e Controllo dei Documenti del Sistema di Gestione Aziendale".
- Company Procedure no. 59 dated 1st august 2008 "Principi e Politiche in Materia di Sicurezza, Salute, Ambiente, Incolumità Pubblica".
- Company Procedure no. 87 dated 1st august 2008 "Il Sistema di Vigilanza sui Delegati".
- Company Health, Safety and Environment (HSE) Management System Model dated 8th july 2008 .
- Application Circular AMSI/01ed. 2 datet 07th april 2008 "Health, Safety and Environment Auditing Procedures".

4. DEFINITIONS

The definitions are provided in the attachment to these Guidelines.

5. TEXT

The Employer, also through his organizational structure, identifies functions and units for the evaluation and management of plant activities in accordance with guidelines on health, safety, environment and public safety as indicated in the attachment.

6. CONSERVATION OF THE DOCUMENTS

The units involved in the process described in these Guidelines, each for the area in their remit, issue and conserve the documentation in accordance with law provisions and the procedures set forth by internal standards, ensuring traceability of the authorization process and controls made.

7. RESPONSIBILITIES AND AUTHORITIES

See text

8. EXCEPTIONS

No exceptions.

9. ATTACHMENTS

Attachment: Guidelines in Safety, Health, Environment and Public Safety.

10. MODIFICATIONS LOG

Edition	Date	Remarks
Ed. 1	01.12.2002	Issue
Ed. 2	01.09.2008	Revision

11. SIGNATURES SHEET

Approving Unit	Date	Signature
Management reference (Unit: Dept. AMSI – head office)	01.09.2008	(on the Italian original)
System reference person (Unit: AMSI dept. – head-office)	01.09.2008	(on the Italian original)
ORSE	01.09.2008	(on the Italian original)

Polimeri Europa

Attachment to Guidelines HSE/PE-112

Guidelines on Safety, Health, Environment, Public Safety and Sustainability

TABLE OF CONTENTS

1. THE COMPANY HEALTH, SAFETY, ENVIRONMENT, PUBLIC SAFETY AND SUSTAINABILITY MANAGEMENT SYSTEM

Management of safety, health, environment and public safety issues involves different areas of the company and will be effective and efficient only if a standardized approach is adopted.

The basic elements of the "management system" are:

- the policies;
- the guidelines and company procedures;
- the organization;
- the procedure for implementing laws and collective contracts;
- the planning processes and programmes for specific questions;
- the energy consumption plans;
- water and non-renewable raw materials;
- waste management, risk evaluation and management;
- information and training processes;
- improvement plans and control and review of performances.

1.1. DEFINITIONS

Audit	Systematic and independent examination aimed at establishing whether the activities regarding Health, Safety, Environment and Public Safety and the results obtained correspond to those established and whether what has been established is implemented effectively and is suitable for the pursuit of the objectives.
HSE management system	Identifies (on the basis of international standards): organizational structure, planning activities, responsibilities, practices and procedures, procedures and resources to define, implement, set up, review and maintain the HSE policy
Technical audit (System audit)	Check the complete and correct application of the Management System.
HSE Conformity Audit	Process to control the conformity to law provisions or sector specifications carried out on production lines or specific working activities.
Emergency	All and any accidents or anomalous conditions that can seriously compromise the safety of the employees, local populations and/or the environment.

Significant event	Spill of significant quantities of toxic or hazardous substances, fire, explosion or other events that give rise to: • death, serious physical harm or serious negative effects for the health of people or for the environment; • damages to property for an amount of Euro 5 million or more.
Polluting substances	Substances that can cause significant risks of acute or chronic pathology and create serious problems for the health of people or for the environment.
Operating safety	Control of dangers caused by errors or malfunctions regarding activities such as: production processes, distribution and storage, manufacturing, pipelines, waste treatment, energy generation systems, pilot plants and laboratories.
Operating safety standards (SSO)	All the technical measures and procedures identified and implemented to reduce the risks related to the "Top Events" identified in the safety analysis to an acceptable level.
Dangerous works	The list below, which is not complete, gives some examples of dangerous works: • confined space entry; • working with electrical equipment; • opening equipment and/or pipes containing dangerous fluids and/or which operate at high pressure and temperature (≥ 60 °C); • working in areas with high or low oxygen levels; • manual or mechanical excavation works; • working close to downed electrical lines; • sources of ignition, naked flames in areas with the possible presence of inflammable vapours; • rupture of pressurized equipment/pipes; • works that expose workers to the risk of falls from height; • works in the presence of radioactive sources.

1.2 CRITERIA AND IMPLEMENTATION PROGRAMMES

All the operating sites must have a "Management System" for safety, health, environmental and public safety issues, drawn up according to the principle of continuous improvement such that:

Evidence of the commitment	The commitment to pursue the priority goal of ensuring the safety and health of employees, of the community, of contractors and of clients and the environmental protection and public safety is perceived by all the personnel
Procedures	Specific programmes and procedures are developed with the aim of regulating all the site's activities, in accordance with the company's policies and guidelines.
Organization and Structures	Structures are set up with specific tasks and responsibilities and suitable operating capacities. Each manager will define the annual health, safety and environment objectives for his/her Function.
Plans and resources	Budgets, plans and specific programmes are developed in order to identify and allocate the resources needed to achieve short, mid and long-term objectives.
Information	An internal system is in place to spread information such as to guarantee a correct approach to issues regarding safety, health and the environment at all company levels
Training	Systematic training and awareness plans are in place which envisage the periodic participation of all employees; periodic refresher seminars are also planned for management
Updating	The guidelines, procedures and internal standards are periodically reviewed and updated, ensuring adequate diffusion to the persons involved
Controls	Control mechanisms (audits, inspections, etc.) are carried out to check that: • policies, programmes and procedures are correctly applied; • organizational responsibilities are clearly defined, understood and operative; • products and industrial activities comply with law provisions and internal standards; • any deviations are identified and the relative corrective actions are taken; • all recognizable situations of risk are identified and

	controlled; • the continuity of compliance is ensured over time; • the factors that impact the environment, the personnel and the territory caused by the industrial activities at the site are suitably controlled and that the effects are correctly monitored and registered.
Efficiency evaluation	The efficiency of the management system is periodically evaluated as a function of the expected results.

2. GENERAL GUIDELINES

2.1 EMERGENCY PLANS

All sites and all operating units, without prejudice to legal and collective labour agreement obligations, must have in place plans and procedures to cover all types of reasonably foreseeable scenarios; these plans and procedures must provide appropriate information for all the employees of the unit, for the Authorities and for the communities.

2.1.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Content	The emergency plans and procedures must have a minimum content of information on the following aspects: • identification of the single emergency scenarios; • instructions for directors, office staff, operators, third parties and visitors regarding: ○ emergency organization; ○ alarm systems; ○ internal communication network: ○ external communication network towards the Authorities and communities; ○ emergency equipment and systems, personal protection equipment and evacuation routes; ○ procedures to minimize the damage to people and the environment resulting from the specific emergency situation; ○ plans to restore normal operating conditions; ○ instructions where necessary for external communities; ○ a training programme for all those involved in or responsible for the emergency plans; ○ periodic drills with the aim of assessing the operational efficiency of the emergency procedures extended, if necessary, to the Authorities and communities.
Coordination with outside companies	The emergency plans and procedures must be coordinated with those of the other companies located in the area.
Updating	The updating and revision of the emergency plans and procedures must be carried out at least once every two years and in any case every time the organization undergoes significant changes
Documentation	The emergency plans and procedures, training programmes, periodic efficiency control as well as all their revisions must be documented and available

2.2 ACCIDENTS, INJURIES AND NEAR MISSES

The operating sites must have in place a procedure and system for reporting accidents, injuries and near-misses.
In the event of major accidents or others that could have an impact on the company's image, appropriate procedures must envisage prompt reporting both to the company's top management and to the relative Corporate functions.

2.2.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Statistics and documentation	Without prejudice to legal obligations, the operating sites must keep statistics on accidents and injuries - catalogued on the basis of their seriousness - up-to-date and available. Appropriate procedures must envisage periodic examination of the accident prevention statistics and the ensuing plans; both must be documented and available.
Near-misses	All employees, in a spirit of full collaboration and responsibility, must report any situations of danger not sufficiently regulated and circumstances in which, even although no accident has occurred, critical aspects have been identified regarding health, safety and the environment. Appropriate procedures must facilitate and organize these reports to the relative functions of the operating site respnsible for the examination and identification of the solutions.
Report	Every major accident must be investigated and documented in a report containing at least: • description of the circumstances; • causes; • corrective actions so that they do not happen again; • schedule of any actions to be taken; • identification of persons responsible for implementing the planned actions; • screening at simlar plants.

2.3 COMMUNICATION AND TRAINING

Communication to employees, third parties and visitors of all safety, health and environment aspects related to their activities and the location, their ongoing training and awareness of the existing risks are essential factors for the success of the company's operations.

2.3.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Initial communications	Before joining the company or a new function, all employees must be correctly informed of the health, safety and environment level of the work places, of the risk evaluation, of the emergency procedures and of the management procedures.
Training	The list of necessary and obligatory training courses is drawn up for each company function. The subject-matters and their frequency are also programmed. The documents attesting the performance of the courses must be filed in the employees' personal records.
Efficacy of the Training	The efficacy of the training must be evaluated periodically and must be documented.
Workers involved in activities entailing risk of major accidents	People working in plants at risk of major accident, before taking actions autonomously, must have completed specific training cycles with monitoring of progress.
Information for visitors and third parties	Appropriate information on health, safety and the environment is provided to visitors and third parties before accessing the company's premises. Information must be provided on: • emergency procedures; • risks to health, safety and the environment where necessary; • personal protection equipment and devices where necessary;

2.4 EXCEPTIONS

Exceptions to the internal health, safety, environment and public safety procedures must be authorized in advance and documented before being implemented.

2.4.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Responsibilities	The Plant Director identifies the function responsible for the process regulated by the process that can authorize any departures from same.
Criteria	An exception can be requested only when: a) there is a legal requirement that contradicts an internal procedure; b) the exception envisages means of prevention and protection equivalent to those of the procedure in question; c) measures are taken with the aim of eliminating the need for the exception and the continuation of the activities does not negatively affect the health and/or safety of the employees, the communities or the environment.
Documentation	The process for requesting, granting, regulating and cancelling exceptions must be fully documented and available. At the very least the documentation must: • indicate the procedure subject to the exception; • indicate the time limits of the exception; • indicate the transitory compensatory measures/procedures; • give justification of the time limits of the exception if they exceed one year.
End of exceptions	Exceptions will normally have a maximum deadline of one year.

2.5 THIRD PARTIES' ACTIVITIES ON COMPANY PREMISES

All the operating sites must have in place procedures that strictly regulate the activities of external companies in terms of health, safety, the environment and public safety.

2.5.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Selection criteria	The selection criteria must be such as to ensure that Third Parties able to work in compliance with laws and the internal procedures of the operating unit are chosen. Before preparing their bids, the companies chosen must have seen the plants and sites they will be working at and must have received data regarding the environmental and safety risks related to the operations contracted with special reference to possible dangerous events deriving from the process.
Information to third parties	Before starting activities in the operational units, third parties must be informed in writing about: • known situations of danger their employees may be exposed to, with specific reference to products; • prevention measures adopted in the operating unit; • internal standards regarding health, safety and the environment; • emergency procedures; • any risks of interference with other companies.
Obligations of third parties	Before starting activities, third parties must undertake in writing to: • comply with law provisions with specific reference to the safeguard of the environment, treatment of waste and specific prescriptions regarding the contracted activities; • communicate any changes compared to the agreed contractual conditions, operating methods and instruments used that can affect operational safety; • allow access of workers to areas where the activities are carried out; • promptly report any accident or potentially serious accident regarding health, safety and the environment which involves technology, materials or equipment belonging to the company; • when necessary, treat waste containing hazardous substances using only technologies and plants authorized by the Company.
Evaluation of third parties	The activities of the individual external companies operating in the operating units must be evaluated by the personnel tasked with this duty who must arrange for reports to be made in writing of any behaviour which is not in line with the site's internal standards or with law provisions
Responsibilities	Without prejudice to the necessary controls, the contracts must contain specific clauses such as to assign to the company full autonomy and operational responsibility.
Contract termination	The Company reserves the right to terminate the contract in the case of non-fulfilment of the contractor's obligations regarding respect for law with

	special focus on health, safety and the environment.

2.6 THIRD PARTIES' ACTIVITIES OUTSIDE THE COMPANY PREMISES

Third parties' production, storage, cleaning and disposal works on behalf of the company must be carried out in accordance with the internal health, safety and environment standards and without repercussions for the company related to any environmental damage and pollution.

2.6.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Selection criteria	The manager of contracts with third parties must ensure that the external companies chosen are able to work in compliance with the company's health, safety, environment and public safety standards and have a stable financial situation able to cover possible problems arising from the requested works. In cases where dangerous substances (toxic, inflammable, explosive etc.) are involved a visit must be made to the site where the activities will be carried out.
Information and obligations of third parties	Before starting to work, third parties must be informed in writing of all known situations of danger. Therefore, they must undertake in writing to comply with current law provisions, to inform their employees on the dangers related to the work requested and to allow representatives of the company to visit the site where the work is being carried out.
Approvals	Activities carried out by third parties in which dangerous products are used can begin only following the written approval of the Safety Department of the plant and of the relative Procurement Department.
Risk evaluation	An evaluation of risk to the community deriving from the products used must be made before the contracted work starts and periodically after that.
Waste control	The contract manager must check that the third parties arrange for the correct disposal of all waste produced during the performance of their activities.
Terminals and Warehouses	Activities in the terminals and warehouses of third parties operating with the company's dangerous products must be controlled by a specific Safety and Environment Management System which guarantees that their activities comply with law, third parties' internal procedures and the procedures established by the service contract.

2.7 EVALUATION AND MANAGEMENT OF TRANSPORT RELATED RISKS

Programmes must be in place which provide a reasonable guarantee that the risks deriving from transport and, in particular, those carried out in the name and on behalf of the company are identified and managed appropriately and that major accidents are avoided.

2.7.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Evaluation of level of danger	An evaluation must be made for safety and environmental protection purposes of the level of danger of the products transported according to the classification criteria established by specific standards.
Risk evaluation	An evaluation of the transport must be performed to determine the risk it may entail, bearing in mind the presence of ecologically sensitive areas of accidents that have occurred, of the level of traffic and of areas with high population density.
	The evaluation of risks related to transport must be taken into consideration also: • in the choice of the means of transport, bearing in mind the availability of the necessary infrastructure; • in the identification of activities that can affect the safety and protection of the areas involved in the transport; • in any modifications to the distribution systems. Every time new potential risks emerge regarding transport the risk evaluation has to be revised and, if necessary, relative decisions must be taken.
Risk management	The safety and environmental protection risk which can give rise to external events must be managed with the definition and activation of programmes aimed at their minimization. Examples of these programmes are: • issue of safety during transport standards; • qualification of carriers; • control of means used and personnel involved in the transport; • use of packaging which conforms to the standards; • modifications to the transport procedures; • issue of emergency management procedures.
Emergencies	Structures able to tackle emergencies in collaboration with the relative authorities must be available. Any problems or claims (accidents that occurred or were avoided) regarding transport must be reported to the relative central functions.

2.8 INVESTMENTS

The design of new plants and expansions, upgrades or modifications to existing plants, besides the provisions of law, must be subject to a process of internal revision such as to reasonably guarantee that they do not result in an increase of unacceptable risks for health, safety, environment and public safety.

2.8.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Project review	The project review process must reasonably guarantee that: • an appropriate health, safety and environment analysis has been carried out; • the company's design standards and those envisaged by law on health, safety and the environment are observed; • the control and safety systems envisaged guarantee normal operations in all reasonably foreseeable operating condition as well as control of emergency situations; • all the operating procedures and the instruction manuals are available; • there are procedures that establish responsibilities for the review of health, safety and environment aspects of projects.
Control	A documented control must be carried out; this is binding for approval of the projects.
Updates	Following completion of the projects, in the times strictly necessary, all the plant and system documentation involved in the investment as well as the maintenance and integrity plans and personnel training plans must be updated.

2.9 PURCHASE, SALE, TRANSFER AND DISPOSAL OF OPERATING ASSETS

Purchase, sale, transfer and disposal of operating assets must be subject to appropriate evaluation in order to identify risks and responsibilities regarding health, safety and the environment.

2.9.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Evaluation	All purchases and sales that involve operating sites must be preceded by an evaluation of health, safety, environment and public safety aspects of the transaction. The relative report is binding for the performance of the transaction.
Responsibilities	Purchase and sale contract clauses must clearly indicate the contracting party with responsibility (also financial) for any measures regarding health, safety, the environment and public safety.
Placing in safe conditions	Definitive transfer or disposal of an operational asset must be regulated by specific procedures, accompanied by preventive audits that guarantee the restoration and safety of the plants, evaluation of the status of the sites and any ensuing measures.

2.10 AUDIT

The audit is a systematic, independent and documented control aimed at obtaining and evaluating evidence of fulfilment of the audited requirements.
The audit is therefore a fundamental tool in ascertaining the correct functioning of the health, safety, environment and public safety management system as well as in identifying activities and appropriate corrective actions to take.
The environmental, safety and health audit system, formally structured, must provide reasonable certainty that the company's activities are carried out in compliance with law provisions and the company's policies.

2.10.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Programmed audits	All the sites and relative operating units must be subject to environment, safety and health audits carried out periodically and according to set priority criteria. Internal site audits must be carried out with the aim of verifying compliance of individual management systems, compliance with laws, permits and local prescriptions. The Technical Audits (audits of the HSE Management System as a whole), and controls of the compliance on specific working activities with objectives that require independent evaluation, will be carried out under the responsibility of the Health, Safety and Environment department.
Unscheduled audits	For specific purposes unscheduled audits are carried out under the responsibility of the Health, Safety and Environment Department.
Department report	The final audit reports must be distributed to the Functions and/or Departments involved in the follow-up actions
Follow-up	When the final report is received, site management must promptly coordinate the preparation of a detailed plan of action which will indicate the managers of the individual actions and implementation times. The programme defined in this way is distributed to the players involved.
Coordination	The Health, Safety and Environment Department receives the final reports of the Technical Audits and of the compliance controls coordinated by said department as well as the upgrading plans with formalization of a programme which defines the actions (preventive/corrective), their estimated completion data and the manager of the action.

2.11 RELATIONS BETWEEN PRODUCTION SITES AND THE TERRITORY

A plan of integrated actions aimed at the territory must be defined at each production site whose aim is to communicate and understand both parties needs in order to avoid or overcome any situations of conflict and achieve legitimization and approval of the general public.

2.11.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Aims	The good relationship between production sites and the territory must be considered essential in order to maximize the approval of the general public.

Method	In order to guarantee a uniform and consistent approach at all production sites, the integrated projects aimed at the territory must be defined and developed according to a methodological scheme to be developed as follows:
	• scientific investigation (poll or representative panels, etc.) aimed at identifying the expectations of the various segments of the community (employees, citizens, authorities, press, opinion leaders, etc.) making reference to key factors such as:
	  ○ reliability of plants;
	  ○ reliability of procedures;
	  ○ functionality and aesthetics of the site;
	  ○ communication.
	• planning of activities aimed at the goals identified in the wake of the survey with an estimate of the relative costs;
	• implementation of planned actions;
	• control of the achievement of the expected results with a similar method to that used in the initial survey stage.

2.12 HSE REPORTING HSE

For the purpose of the processing of periodic reporting on health, safety, environment and public safety issues, information about the company's activities must be made available in a uniform and consistent way by the peripheral units according to codified schemes.

2.12.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Institutional reporting	The operating units must transmit to the Health, Safety and Environment department: data and accompanying notes for the quarterly/half-year and annual preparation of the HSE report. These must be transmitted in the times and ways envisaged by the AMSI Department in line with the provisions of the ENI data reporting manual. Head office AMSI is responsible for preparing the final figures and sending them to ENI Corporate; data regarding specific issues related to sustainability which are requested by Eni Corporate and/or AMSI on an annual basis; HSE costs within the deadlines and in the ways envisaged by the HSE-PE costs reporting manual; data about the forecast HSE costs and HSE budget within the deadlines and in the ways envisaged by the HSE-PE costs reporting manual.
HSE management report	An annual internal HSE report is prepared with summary data for the management of the site and head office departments.

3. SAFETY RELATED GUIDELINES

3.1 OPERATING SAFETY

There must be plans and procedures in place which provide a reasonable guarantee that the risks related to operations are identified and that the ensuing precautions are taken to avoid accidents which have negative effects on employees, the communities and the environment.
These plans and procedures must cover all the stages of the life cycle of operations (design, assembly, operations, disposal).
The operating safety requirements must be a reference point for all the company's decisions.

3.1.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Risk assessment	The risks involved in the activities carried out must be assessed on the basis of the information available in terms of level of danger of the substances processed and the workplaces. The outcome of the evaluation must also indicate any necessary improvements to the technical, organizational and procedural prevention and protection measures. This assessment must be documented and reviewed at periodical intervals.
Control of operationalmodifications	Operational modifications, even if they are temporary, must be assessed in advance so that there is a reasonable guarantee that: • the provisions of law and internal regulations are respected; • the consequences of the modification are fully understood; • risks and related potential accidents are identified; • the ensuing control procedures and systems are activated. The level of responsibility authorized to approve any operative modification must always be identified.
Safety assessment before start-up	Before starting up any installation, plant or equipment, whether new or modified, a safety assessment must be carried out to verify compliance with law provisions and company regulations on safety, health, the environment and public safety. This assessment must be performed also when a dangerous chemical product is used in a production unit for the first time; when new or modified operating methods and/or maintenance procedures are adopted which could increase the operating safety risk or risk for personnel; when an existing plant is started up again after being inactive for a period of six months or more.
Operations and maintenance	The operating manual and procedures related to start-up, operation, shut-down and maintenance must be up-to-date, available and

	accessible at each plant. The procedures must refer to normal operations and to any foreseeable emergency situations.
Operating Safety Standards	Operating safety standards must be available in the case of activities involving potential risks for employees, the communities or the environment. The following information and procedures must also be communicated and accessible to the personnel involved in the activities: • parameters with associated critical operations and their limits; • the critical regulations including process instruments, alarm/shut-down systems in emergencies and the relative periodic tests; • the equipment whose correct functioning must be guaranteed at all times; • the construction materials and related specifications; • the critical operating procedures; • the construction specifications for the equipment; • the frequency of inspections/tests of the process equipment, lines and instruments; • the periodic and documented control of the fixed and mobile safety systems; • the administrative controls.
Technical Documentation	Updated technical documentation must be available regarding the design of new plants, their modifications and for already existing plants. The engineering standards defined by Polimeri Europa and the provisions of applicable laws must be taken into consideration for all aspects related to the above.
Functional two-yearly review	At least once every three years a Review by Business will be made of the most significant HSE aspects for the purpose of carrying out the relative business. Representatives of all the functions involved in the relative Business will take part. This Review takes into consideration the evolution of standards on safety, health, environment and public safety and the future commercial and operative objectives.
Operative Organization	Each plant must have the personnel, adequate technology and resources to guarantee the safety of operations. Operations involving major potential risks must have a suitable technical organization at all times. The commercial objectives must take into consideration operational safety and be in agreement with safety requirements in general and with the availability of the resources.
Audits	Operational safety audits must be carried out at all plants involving major potential risks.
Property surveillance plan	The plants must have a property surveillance plan in place to prevent unauthorized access and deliberate or accidental acts that can cause major damage, theft, sabotage or terrorist acts. Priority measures are: • physical barriers (walls, fences, gates, locks, etc.); • identification of special areas where only authorized persons can enter or where entrance is authorized only when escorted;

	• electronic surveillance; • control of the presence of personnel and of “visitors” • updated inventory of chemical products present; • patrolling.
Safety of vehicles	The use of vehicles inside the plant to transport people and for specific uses must be regulated by specific procedures to guarantee the protection of the company’s personnel and assets.
Training	The operators must be suitably trained on plant operation and management techniques and, in particular, on all foreseeable emergencies. The operators must be placed in the condition to carry out their activities safely in all ordinary, anomalous or foreseeable emergency situations. The training must cover the use of the safety systems and health and environment protection systems available at the plant. The training must envisage a control that the operators have gained the know-how and skills necessary to carry out their work autonomously. The training activities must be appropriately planned and documented.
Investigation/ reporting of accidents	All injuries, accidents, near misses related to the process, accidents involving property and any event entailing a potential major risk must be investigated and documented. Corrective measures to avoid their repetition must be adopted, identifying those people responsible for their implementation in the times envisaged.

3.2 PERSONNEL SAFETY

Plans and procedures must be in place that allow employees to carry out their work in safe, aware and responsible conditions.

3.2.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Procedures	For every work place and, in particular, for critical operations, procedures and instructions must be available that ensure the safety of the employees, the community and the company's assets.
Protection devices	Personal protection devices (general and specific) must be assigned and employees must use them depending on the jobs they have to carry out. For each of these plans and procedures must exist to guarantee that the protection devices are appropriately selected, available, maintained and usable for the employees in question. Shared and/or collective use protection devices and there location must be identified. Periodic controls must be carried out on the shared and/or collective use protection devices to check their condition.
Training	The operators must be trained on the use of the personal protection devices. The training activities must be appropriately planned and documented.

3.3. DANGEROUS WORKS

Plans and procedures must be in place to ensure the protection of company employees and third parties involved in dangerous works.

3.3.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Identification of areas	At each operating site there must be an updated mapping of the areas in terms of their level of danger in order to activate, for each specific maintenance or similar activity carried out therein, suitable procedures for the performance of said works in safe conditions.
Work permits	Each maintenance or similar activity carried out in potentially dangerous environments (e.g. working at height, working in confined spaces, working with electrical equipment/circuits, excavation works, etc.) must be authorized in advance by means of a work permit issued by line managers of an appropriate level. The work permit must include at least: • issue date and period of validity; • description of work, the area involved and performance methods; • any necessary communication to other units involved; • indication of the specific related risks and precautions to adopt; • description of tests, precautions and equipment; • personal protection devices and required prevention and protection measures; • authorization for the start of operations; • conditions for suspension of the validity of the permit; • end of works control before returning to normal conditions. If pertinent, the evaluation must also include risks from interference

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3.4 SAFETY OF VEHICLES

The use of vehicles to transport personnel and for other specific uses (handling products and goods, mechanical works, etc.), both inside and outside the plants, must be regulated by specific procedures in order to guarantee the protection of the personnel and of the company's assets.

3.4.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Transport of personnel	Suitable control programmes must be in place to control the transport of personnel for work reasons. These programmes must envisage that: • drivers have a valid driving licenses; • the periodic maintenance plans are respected for the vehicles supplied by the company and that such maintenance is carried out by qualified personnel; • law obligations and regulations on the transport of hazardous products, the maximum number of people transported, the use of seat-belts etc. are respected.
Vehicle used for the distribution of products	Procedures must be available for the management of vehicles used for product distribution that indicate: • selection criteria and specification for the method of transport (type of vehicle, requirements for the driver, etc.); • periodic maintenance and inspection programme for vehicles; • parking standards that take into consideration the protection of the load, the possibility of theft, contamination or sabotage, risk for the people present, etc.; The drivers of these vehicles must fulfil the following requirements: • selection criteria based on fitness for the specific duty and past accident data; • driving license of a suitable category for the specific duty; • implementation and control of specific obligations such as work permits, etc. • Appropriate training on: ○ safe driving; ○ product handling; ○ emergency procedures; ○ law obligations; ○ work performed as employees of clients and elsewhere; ○ periodic evaluation of all persons assigned to transport activities.
Other vehicles	Suitable procedures must exist for the management of all other vehicles owned or assigned to the company's activities such as tractors, fork-lift trucks, cranes, moving elevators, station wagons, buses, ships, etc. These must include: • selection/qualification criteria of drivers and relative documentation as envisaged by law; • medical criteria as envisaged by law; • operating procedures which include restricted areas of operations and vehicle limits;

	• periodic control procedures or check-lists; • training of drivers and related documentation; • periodic maintenance programme and its documentation

4. HEALTH RELATED GUIDELINES

4.1 OCCUPATIONAL MEDICINE

Plans and procedures must be in place to protect the health of workers and the environment and for emergency actions.

4.1.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Issues	The procedures and/or programs regarding occupational medicine in general regard: • evaluation of risks for health • health surveillance • health documentation • first aid • health information and training • health promotion
Evaluation of risks for health	Risks for health must be identified, measured and kept under control; the real impact must be verified to prevent damage also in the most critical situations of exposure and/or personal sensitivity. At least once a year the appointed physician must visit the workplace. The results of these visits will be documented and will be used to draw up risk evaluation, measurement and control programs for the health of the employees.
Health surveillance	The following programs must be defined: • periodic and specialist medical check-ups; • early diagnosis of symptoms reported by workers; • instrumental examinations; • monitoring of biological exposure indicators; • integration of environmental and biological methods used to evaluate exposure, • targeted investigations aimed at common pathologies with statistical relevance among the workers; • study of particular individual or collective pathological evidence
Health documentation	Suitable procedures must exist to regulate: • the management of the health documentation within the company; • tasks, responsibilities and information flow regarding information to include in the “health and exposure record” and “registry of workers exposed to carcinogenic agents” as established by current law provisions.
Information and training	Depending on the nature of the agent and entity of the risk, the following programs must exist or be put in place: • information, training and control on awareness of risks, preventive actions taken and any relatable pathologies; • illustration of safety datasheets for products handled and the most effective precautions;

	• explanations and training on the use and care of personal protection equipment.
First-aid	Suitable procedures must exist to regulate: • preparation, for the relative part, of the means and emergency plans to tackle events that can cause injuries or disease; • training of personnel on behaviour to adopt and means to use when providing first-aid.
Health promotion	Special health promotion programmes such as, for example, the prevention of the most common tumours, flu vaccinations, and the prevention of heart disease must be evaluated and defined according to needs and opportunities.

4.2 PROTECTION OF THE WORK ENVIRONMENT

Plans and procedures must exist for risk evaluation and the protection of workers against physical, chemical and biological agents at the workplace.

4.2.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Issues	In general, procedures and/or programs for the evaluation and protection of the workplace must regard the following issues: • industrial hygiene • evaluation of the exposure risk • planning of exposure control • ergonomics • use of new technologies
Identification of dangers	The dangers and related risks for health at the workplace must be suitably detected, analyzed, identified and measured. All information available must be taken into consideration, including: • known health dangers in relation to physical, chemical and biological agents at the workplace; • results of health surveillance and evaluation of exposure of personnel; • evaluations of epidemiological studies on specific work activities; • reports made by employees and contractors; • new scientific information
Information and Training	Employees must be suitably informed and trained on: • health dangers and related risks to which they may be exposed; • suitable protection precautions against adverse effects to health; • actions in reasonably foreseeable emergency situations. • The personnel must be promptly informed of any new dangerous situations, the relative potential risks for health and the safety measures to adopt.
Exposure limits	Exposure of personnel to physical, chemical or biological agents must not exceed the legal limits, those set by the collective labour agreement for the sector and internal standards but, where possible, also those commonly recognized at an international scientific level, if more restrictive.
Reduction of exposure	Immediate measures must be taken to reduce the level of exposure of the personnel subject to potential health risk, reducing said to the level envisaged by law or internal limits when the exposure exceeds such limits.
Controls	Where explicitly requested, exposure control registers must be filled in as envisaged by law provisions and company regulations. These registers must contain the following information: • employees and/or controlled work areas; • conditions and type of work carried out; • list of risks and exposure level • protective measures for the personnel • sampling and analytical methods used In particular, specific control programmes exist for: • chemical and carcinogenic agents

	• noise • ionizing radiation • asbestos • computer screens.
No-smoking	Suitable control measures must be taken to ensure that the smoking ban at the workplace is respected where expressly indicated
No alcohol	Suitable control measures must be take to ensure that no alcohol is consumed at the workplace

4.3 PROTECTION OF THE RESPIRATORY TRACT

At each plant there must be plans and procedures in place to ensure that the equipment and devices for the protection of the respiratory tract are stored and maintained correctly and are available for employees when necessary.

4.3.1 CRITERIA AND IMPLEMENTATION PROGRAMMES

Procedures	The procedures for controlling the use of respiratory tract protection equipment and devices must take into consideration the following: • Respiratory tract protection devices must be chosen considering both the type of contaminant (chemical or biological) and its concentration • Only homologated devices must be chosen. If an appropriate device for a given job in dangerous atmosphere is not available, the job can be carried out only with a self-Contained Breathing Apparatus or other “positive pressure” type equipment • Instructions must be available for each type of device • All the people involved must be given periodic training • The devices must be inspected before and after use at the end of the working day they must be cleaned and disinfected, unless otherwise indicated in a written procedure; • The devices must be kept in clean, safe and suitable places • Only qualified personnel authorized by the manufacturers can carry out maintenance or make modifications to masks • Documented registration of the maintenance and inspection of all devices or equipment usable in emergencies must be kept
Medical examination and report	All personnel subject to the frequent use of respiratory tract protection devices must undergo medical examination to check their pulmonary capacity and fitness for the job.

5. ENVIRONMENTAL GUIDELINES

5.1 EMISSIONS TO THE ATMOSPHERE

Plans and procedures must be in place providing reasonable assurance that emissions to the atmosphere arising from industrial activities performed on the sites are characterised and contained within acceptable levels for the protection of health and the environment, in accordance with the best available and economically feasible technology.

5.1.1 IMPLEMENTATION CRITERIA AND PROGRAMS

Inventory	An inventory of emissions, whether they may be point, diffuse or fugitive, must be conducted and kept up to date and must contain at least the following information: • an acronym identifying the point of emission with reference to the installation that it originates from; • any reduction technology (for point emissions); • the nature of the polluting substances emitted; • the quantity and concentrations emitted; • recurrence and duration in the event of discontinuous emissions; • authorisation details, duration of authorisations and any provisions.
Polluting substances	A program must be set up to control, reduce and monitor the emission of polluting substances in order to guarantee emission values in line with the most up-to-date knowledge in terms of industrial toxicology. Procedures must be in place to guarantee that point emission reduction systems continue to work efficiently. Suitable procedures must guarantee and document the systematic control of any leaks from sources of fugitive and diffuse emissions (e.g. valves, flanges, stuffing boxes, floating roof tank seals, etc.). In order to attain objectives increasingly closer to zero, closed circuit operation must be adopted for R45/R49 toxic substances when technically possible.
Management of transitional events	Procedures must be in place to govern start-ups, shut-downs, production changes, etc. in order to minimise emissions during transitionalperiods. Similar procedures must also manage sampling, cleaning and maintenance operations.
External monitoring	The monitoring network outside sites must be managed so that warnings preventing critical situations are generated in real time and operating plans must be ready to be put into action should the alarm or emergency threshold be reached. Studies must be carried out to assess the fallout of pollutants deriving from the site and put it into relation with the quality standards defined by the standard.

Smells	The most advanced technology must be studied and used to prevent unpleasant odours arising from the sites.

5.2 GREENHOUSE GAS EMISSIONS

Plans and procedures must be in place providing reasonable assurance that greenhouse gas emissions to the atmosphere arising from industrial activities performed on the sites are quantified and contained in accordance with the best available and economically feasible technology.

5.2.1 IMPLEMENTATION CRITERIA AND PROGRAMS

Inventory	An inventory of greenhouse gas emission sources must be conducted and kept up to date and must contain at least the following information: • an acronym identifying the source of emission with reference to the installation that it originates from; • the nature of the greenhouse gas emitted; • authorisation data and any provisions.
Monitoring	Procedures must be in place to: • define the methods used to monitor sources of greenhouse gases, in line with that set forth in the regulations currently in force concerning Emission Trading; • guarantee efficient instruments and accurate measurements for the purposes of calculating emissions.
Reporting	Every three months: • the quantity of greenhouse gases emitted must be calculated; • forecast data relating to emissions for the current year and the following years in force on the allocation plan must be entered.
Minimisation	Studies and/or programs to progressively reduce greenhouse gas emissions must be prepared, with the objective of minimising the same by using the best, economically feasible technology available.

5.3 INLAND AND MARINE SURFACE WATER PROTECTION

Plans and procedures must be in place providing reasonable assurance that activities carried out on the sites do not have a negative effect on inland or marine surface water.

5.3.1 IMPLEMENTATION CRITERIA AND PROGRAMS

Inventory	An inventory of drain points and the relative polluting substances discharged into the receptor or the public sewers must be conducted and kept up to date. Said census must identify the drain point/points, the type of pollutant, the concentration, the quantity, the relative authorisation and its expiry date and any provisions.
Water statement	A global water statement related to surface water on the sites must be prepared and updated at least once a year and for every flow must specify: the origin, flow rate, quality, current use and future forecasts.
Receptor body	The drain must be assessed for compatibility in relation to the characteristic data of the receptor body and its actual and planned use, and all technical and economical measures feasible must be taken to prevent potentially negative effects and optimise prevention. Studies must be carried out to assess the dispersion of pollutants in the receptor body and put it into relation with the quality standards defined by the standard.
Minimising water consumption	Every time that it is technically and economically feasible, and when not already implemented, changes should be made to the existing cycles including the adoption of closed cycles and recycling processed water to reduce the consumption of soft water and consequently reduce the amount of water discharged into the drain. The design of new installations, new equipment or important changes to the same, must take into account the need to preserve the quality of inland and marine surface water with the objective, if technically and economically feasible, of reducing the consumption of soft water and consequently reducing the amount of water discharged into the drains.
Drain inspections	Procedures governing the prevention, control and management of accidental spillage of polluting substances must also aim to protect inland and marine surface water.
Flow separation and Monitoring	Polluted or potentially polluted water must be kept separate from meteoric or cooling water and must be treated and then verified before being discharged into the receptor body. When there is a possibility that the meteoric or cooling water have been contaminated, they must also be isolated and verified, before being sent to sea/river, so that the flow can be treated before.

Documentation	Periodic monitoring of drains, plans and analyses must be suitably documented, filed and kept available.

5.4 WASTE MANAGEMENT

Plans and procedures must be in place providing reasonable assurance that the production of waste deriving from activities performed on the sites is monitored, checked and progressively reduced and that waste management methods do not have a negative effect on the environment and/or on health and safety, both for employees and for the local community.

5.4.1 IMPLEMENTATION CRITERIA AND PROGRAMS

Inventory	Without prejudice to records or any other communications or documents required by regulations currently in force, a waste inventory must be conducted and updated at least once a year and must include at least the following information for each type of waste: • its origins and the process that generated it; • its data sheet; • the CER classification; • the quantity produced; • the quantity in temporary storage; • the quantity stored whilst awaiting disposal/recycling in D15/R13; • single waste destinations (recycling and/or disposal). A census concerning waste disposal/recycling/conveying companies must also be conducted and kept up to date and must contain at least the following information: • their personal data; • an up-to-date copy of the authorisations issued by the competent Authority.
Waste separation	Waste must be separated at the point of origin, according to type and CER classification, based on the analyses and the recycling opportunities.
Minimisation	The quantity produced over the year must be monitored and studies and/or programs to progressively reduce waste must be carried out, with the objective of minimising the same by using the best, economically feasible technology available. Similar programs must also be implemented for the progressive disposal of waste accumulated previously. Preference must be given to action taken at the source of waste production, and consequently reuse, recycling, recovery and similar techniques. Studies concerning these matters must be included in the design of new installations/processes. Preference will be given to suppliers who minimise residual solids by collecting used packaging, exhausted catalysts, reusable containers, etc for recycling or other uses.
Disposal techniques	Studies and/or programs must be conducted concerning the identification and application of the best storage, disposal and recycling methods that can

	reasonably be used to reduce the risk to man and the environment. The following aspects must be considered: regulations currently in force and forthcoming regulations; the intrinsic hazard of the waste; the degree of effectiveness with which it is possible to destroy or make hazardous waste components harmless; the residues or by-products produced, including drums used as containers; risks related to handling and transport; immediate and deferred health and environmental risks; immediate and deferred costs; any other relevant factor.
Disposal systems	The disposal of hazardous waste in waste tips must be minimised and limited to cases for which there are no other feasible alternatives. In theory, when technically and economically possible, waste is subjected to techniques such as pre-treatment, stabilisation and inertisation before disposal.
Disposal by third parties	Procedures related to the transport and/or disposal of site waste by Third Parties must be considerably precautionary and strict, and in particular must include: • verification that the company is a authorized waste subject • a written declaration from the Third Party company that the entire waste disposal process will be carried out in such a way as to guarantee compliance with the regulations in force and the prevention of negative effects for man and the environment; • receipt of a certificate from the waste disposal company attesting that the waste has been disposed of in accordance with the above-mentioned conditions; • prompt supply to Third Parties of any information available concerning the nature of the waste and the hazard posed by the same, through a data analysis sheet; • the criteria to adopt when selecting a Third Party which, aside from economic convenience, must also have suitable technical references, a good reputation, be properly registered to carry out the activity and be financially stable; • periodic inspections at the Third Party's premises, before and during waste disposal operations; any anomalies found must be reported to those responsible for contract negotiation.

5.5 PROTECTION OF THE GROUND AND THE AQUIFERS

Plans and procedures must be in place providing reasonable assurance that activities carried out on the sites will not have any negative effects on the ground or the aquifers.

5.5.1 IMPLEMENTATION CRITERIA AND PROGRAMS

No unloading	Unloading or depositing substances that could directly or indirectly contaminate the ground or aquifers must be prohibited.
Inventory	An up-to-date inventory (with localisation) must be available of past and present activities carried out on the sites that could potentially have contributed or contribute to negative effects on the ground or aquifers.
Ground and aquifer inspection	Up-to-date inspection reports concerning the state of the ground and the aquifers (lithostratigraphic characteristics, chemical analyses, piezometrical analyses, etc…) must be available for sites in which such environmental conditions are known or suspected to be jeopardised. If there is any evidence or reason to suspect that the ground and aquifers have been jeopardised, studies must be commissioned to identify and take appropriate technically and economically feasible action to control the situation, implement safety measures and/or reclaim the land.
Prevention and control	Procedures governing the prevention, control and management of spillages and accident control of polluting substances must also be designed to minimise the potential risk of ground and aquifer contamination. Periodic inspections must be performed to check the state of maintenance of the sewers, tanks and other conduction systems to prevent substances from being released into the ground and aquifers.
Installation design and changes	The design of new installations or equipment or important changes to the same must take into account the need to minimise the risk of contamination. Tank designs must be verified to ensure that they comply with standards guaranteed to prevent percolation.

5.6 NOISE

Plans and procedures must be in place providing reasonable assurance that the noise produced by various sources present on the sites is reduced to the lowest technical levels and is not loud enough to have a negative effect on the health of employees or the surrounding population.

5.6.1 IMPLEMENTATION CRITERIA AND PROGRAMS

Inventory	Without prejudice to legal requirements, an inventory of the most important sources of noise both inside and outside the departments must be available and updated at least every 4 years, and must include the following information: • noise level in dB(A); • frequency analysis of the source (in octave bands); • any impulsive or tonal components must be highlighted; • recurrence and duration in the event of discontinuous emissions; • acoustic standards for the specific source as required by law or in the relevant regulations (when present). Monitoring must be repeated after any significant changes in operations, equipment, etc.
Mapping	A map showing the sound levels along the external perimeter of the site must be available and reviewed at least once a year and must include: • sound levels in dB(A) measured during the day and night in normal weather conditions; • any impulsive or tonal components must be highlighted for every monitoring point; • recurrence and duration in the event of discontinuous emissions; • the Council definition (provisional or final) of the territory's destination-of-use class in order to establish the consequent absolute noise acceptability limits. Perimeter measurements must be repeated by qualified personnel at least every 5 years and in any case following to variations in the installation.
External residential environments	For cases in doubt, studies must be carried out, if necessary using mathematical models, to verify noise acceptability inside homes located in the area surrounding the site, on the basis of which any action needed can be planned.
Personnel protection	Plans and procedures to protect the hearing of personnel concerned must, as minimum requirements, include the following aspects: • noisy areas in the workplace must be well indicated using suitable warning signs; • all areas of the workplace with a noise level of more than 85 dB(A) must be indicated with a warning sign; • personal protective equipment (PPE) to protect hearing must be made available to all employees concerned.

	PPE must be used in all areas with a noise level greater than 85 dBA. Instruments used to monitor noise (phonometers and suchlike) must be of a suitable Class and must be calibrated in a timely and regular manner. The appointed doctor will program audiometric tests and regular examinations based on the regulations in force and his own judgement; the test results will be communicated to the persons concerned immediately. An annual information and training program must be provided for all employees with a daily personal exposure level equal to or greater than 80 dB(A).

6. PRODUCT MANAGEMENT GUIDELINES

6.1 PRODUCT RISK MANAGEMENT AND ASSESSMENT

Programs must be in place providing reasonable assurance that health, safety and environmental protection risks, connected with the products, are assessed and managed appropriately.

6.1.1 IMPLEMENTATION CRITERIA AND PROGRAMS

Hazard assessment	The intrinsic characteristics of the products must be assessed to determine the hazard. The assessment must take into account information available about the products, including: • information written in the literature; • information deriving from company research; • information related to accidents, occurred or prevented; • knowledge and experience gained within the Company. If necessary and/or appropriate further tests and research must be carried out to identify significant potential hazards connected with the products of a chemical-physical, toxicological and/or ecotoxicological nature, in order to identify all of the precautions designed to prevent negative effects on health, safety and the environment.
Risk assessment	The products must be assessed to determine the risk that they could represent, with reference to known exposure scenarios, intrinsic hazard characteristics, accidents occurred or prevented, the possibility of personal exposure, contact with the environment and transport. Forbidden uses of the product and possible accidents, if reasonably foreseeable, must also be considered.
Decisions	Product risk assessment is an element that affects company decisions concerning: • new product development; • expansion into new applications for existing products; • substantial changes in the process that could influence product quality and safety; • changes in product distribution systems and the product's method of use. The risk assessment must be reviewed and, if necessary, company decisions must be made as a result, every time new information emerges about a product.

Risk management	Product risks in terms of health, safety and the environment must be managed by identifying and implementing programs designed to minimise that risk. Some examples of such programs are: • the issue of product safety regulations, including those related to their transport; • product quality control; • changes in the packing, storage, handling or distribution channels; • indication of exposure limits; • product changes; • customer assistance and, if necessary, selection of the same; • product recall from the market.
Notifications	Distributors must report any problems or complaints concerning the Company's products (accidents, occurred or prevented, in terms of health, safety and the environment, incorrect product use, unsafe handling of the product, etc.) to the appropriate person within the company.
Purchasing	All of the information concerning hazardous and non-hazardous substances/preparations purchased by the company from third parties must be requested, in the form of a Safety Data Sheet, in order to assess the risk posed to health, safety and the environment.

6.2 PRODUCT SAFETY INFORMATION

Programs must be created to guarantee that those who are potentially interested receive enough information about the products in terms of health, safety and the environment, in line with national and international standards.

6.2.1 IMPLEMENTATION CRITERIA AND PROGRAMS

Safety Data Sheet	In accordance with current legislation and internal procedures, all hazardous chemical products, even experimental or intermediate products, must have a Safety Data Sheet in compliance with the requirements set forth in the standard. Non-hazardous products must have an appropriate data sheet.
Labelling	Packaging, containers, piping, etc. containing hazardous products must be labelled in accordance with regulations currently in force and/or internal procedures.
Distribution of safety information	Product safety information must be sent to all those concerned, including distributors, retailers, transporters, clients and end users, before or with the first delivery of the hazardous product and any time that changes are made to the product.
Revision of safety information	Product safety information must be revised every time that significant, new knowledge related to the product demands it.
Products purchased from Third Parties	Any products purchased from Third Parties and used in the production process or handled in any way must be accompanied by a Safety Data Sheet.

7. REVISIONS

This document must be revised by the Health, Safety and Environmental Management, for single matters or as a whole, following to the issue of new standards introducing changes to existing guidelines or new obligations or in the event of innovative management techniques in the field of health, safety, the environment and public safety, and in any case on termination of the fixed three-year duration.