



**Officine Costruzioni Speciali Spa
Via Battaglia, 167
35020 – Albignasego (PD)**

INTEGRATED MANAGEMENT SYSTEM MANUAL QUALITY, ENVIRONMENT, SAFETY

Ed. 01 Rev. 03 - 2024 SEPTEMBER 18TH

According to standards

UNI EN ISO 9001:2015

UNI EN ISO 14001:2015

UNI ISO 45001:2018

UNI EN ISO 3834-2:2021

**Issued and checked by:
QHSE Manager**

A handwritten signature in blue ink, appearing to read 'Raffa', is positioned below the text 'QHSE Manager'.

**Approved by:
General Manager**

A handwritten signature in blue ink, consisting of several stylized loops and lines, is positioned below the text 'General Manager'.

SECTION INDEX

- 0.1 INTEGRATED MANAGEMENT SYSTEM MANUAL INDEX
- 0.2 STATUS OF INTEGRATED MANAGEMENT SYSTEM MANUAL EDITIONS
- 0.3 STATUS OF INTEGRATED MANAGEMENT SYSTEM MANUAL SECTIONS REVISION
- 0.4 GENERAL
- 0.5 QUALITY MANAGEMENT PRINCIPLES
- 0.6 PROCESS APPROACH
- 0.7 RISK BASED THINKING
- 0.8 COMPATIBILITY WITH OTHER MANAGEMENT SYSTEM STANDARDS

MATRIX OF SECTION_0 REVISION				
REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01	14.10.2022	Rif. new standard UNI UNI EN ISO 3834-2:2021		
02	22.11.2023	New functional organization chart in section 5		
03	18.09.2024	Change functional organization chart, insertion of new Company Policy (sec. 5); Change par. 7.2 and 7.3		
04				
05				

0.1 INTEGRATED MANAGEMENT SYSTEM MANUAL INDEX

IMS MANUAL SECTION	§ SECTION	INTEGRATED MANAGEMENT SYSTEM MANUAL	§ UNI EN ISO 9001	§ UNI EN ISO 14001	§ UNI ISO 45001
0	--	Manual index, distribution list, Manual editions, Sections' revision	--	--	--
	0.1	Integrated management system manual index	--	--	--
	0.2	Status of integrated management system manual editions	--	--	--
	0.3	Status of integrated management system manual sections revision	--	--	--
	0.4	General	0.1	--	--
	0.5	Quality management principles	0.2	--	--
	0.6	Process approach	0.3	--	--
	0.7	Risk based thinking	0.3		
	0.8	Compatibility with other management system standards	0.4	--	--
1	--	Integrated Management System scope	1	1	1
	1.1	Integrated management system scope	1	1	1
2	--	Normative references	2	2	2
	2.1	Normative references	2	2	2
3	--	Terms and definitions	3	3	3
	3.1	Terms and definitions	3	3.1 → 3.4	3.1 → 3.37
	3.2	Acronyms	--	--	--
4	--	Context & application field	4	4	4
	4.1	The organization and its context	4.1	4.1	4.1
	4.2	The needs and expectations of interested parties	4.2.	4.2.	4.2.
	4.3	Integrated Management System application field	4.3	4.3	4.3
	4.4	Integrated Management System and e related processes	4.4	4.4	4.4
5	--	Leadership and commitment	5	5	5
	5.1	Leadership and commitment	5.1	5.1	5.1
	5.2	Company policy	5.2	5.2	5.2
	5.3	Roles, responsibilities and authorities	5.3	5.3	5.3
	--	Corporate policy statement	--	--	--
6	--	Planning	6	6	6
	6.1	Actions to address risk and opportunities	6.1	6.1	6.1
	6.1.1	Environmental aspects	--	6.1.2	--
	6.1.2	Hazard identification, risk and assessment of risk and opportunities	--	--	6.1.2
	6.1.3	Compliance duties, legal & other requirements to fix	--	6.1.3	6.1.3
	6.1.4	Planning activity	--	6.1.4	6.1.4
	6.2.	Company objectives	6.2	6.2	6.2
	6.2.1	Planning to achieve company objectives	6.2.1	6.2.1	6.2.1
	6.2.2	Planning to change management programs	6.3	6.2.2	6.2.2



INTEGRATED MANAGEMENT SYSTEM MANUAL

MSGI
SECTION_0

Manual index, distribution list,
Manual editions, Sections' revision

IMS MANUAL SECTION	§ SECTION	INTEGRATED MANAGEMENT SYSTEM MANUAL	§ UNI EN ISO 9001	§ UNI EN ISO 14001	§ UNI ISO 45001
7	--	Support	7	7	7
	7.1	Resources	7.1	7.1	7.1
	7.1.1	People	7.1.2	7.1	7.1
	7.1.2	Infrastructures	7.1.3	7.1	7.1
	7.1.3	Environment for the functioning of processes	7.1.4	7.1	7.1
	7.1.4	Resources for monitoring and measurement	7.1.5	7.1	7.1
	7.1.5	Organizational knowledge	7.1.6	7.1	7.1.
	7.2	Competence	7.2	7.2	7.2.
	7.3	Awareness	7.3	7.3	7.3
	7.4	Communication	7.4	7.4	7.4
	7.4.1	Internal and external communication	--	7.4.2 - 7.4.3	7.4.2 - 7.4.3
	7.5	Documented information	7.5	7.5	7.5
	7.5.1	Creating and updating	7.5.2	7.5.2	7.5.2
	7.5.2	Control of documented information	7.5.3	7.5.3	7.5.3
8	--	Operation	8	8	8
	8.1	Operational planning and control	8.1	8.1	8.1
	8.1.1	Eliminating hazards and reducing risks	--	--	8.1.2
	8.1.2	Management of change	--	--	8.1.3
	8.2	Requirements for products	8.2	8.1	8.1
	8.2.1	Customer communication	8.2.1	8.1	8.1
	8.2.2	Determining the requirements for products	8.2.2	8.1	8.1
	8.2.3	Review of the requirements for products	8.2.3	8.1	8.1
	8.2.4	Changes to requirements for products	8.2.3	8.1	8.1
	8.2.5	Commercial process flow chart	--	--	--
	8.3	Design and development of products	8.3	8.1	8.1
	8.3.1	Design and development planning	8.3.2	8.1	8.1
	8.3.2	Design and development inputs	8.3.3	8.1	8.1
	8.3.3	Design and development controls	8.3.4	8.1	8.1
	8.3.4	Design and development outputs	8.3.5	8.1	8.1
	8.3.5	Design and development changes	8.3.6	8.1	8.1
8.3.6	Design and development process flow chart	--	--	--	

IMS MANUAL SECTION	§ SECTION	INTEGRATED MANAGEMENT SYSTEM MANUAL	§ UNI EN ISO 9001	§ UNI EN ISO 14001	§ UNI ISO 45001
8	8.4	Control of externally provided processes, products and services	8.4	8.1	8.1.4
	8.4.1	Qualification, evaluation and monitoring of suppliers	8.4.1	8.1	8.1.4
	8.4.2	Type and extent of control	8.4.2	8.1	8.1.4
	8.4.3	Information for external providers	8.4.3	8.1	8.1.4
	8.4.4	Procurement process flow chart	--	--	--
	8.5	Production and service provision	8.5	8.1	8.1
	8.5.1	Pressure equipment manufacturing	8.5.1	8.1	8.1
	8.5.2	Validation of special processes	8.5.1	--	--
	8.5.3	Identification and traceability	8.5.2	--	--
	8.5.4	Properties belonging to Customers or Suppliers	8.5.3	--	--
	8.5.5	Preservation	8.5.4	--	--
	8.5.6	Post-delivery activity	8.5.5	--	--
	8.5.7	Change control	8.5.6	--	--
	8.6	Release of products	8.6	--	--
	8.7	Control of non-compliant products	8.7	--	--
	8.7.1	Product manufacturing process flow chart	--	--	--
	8.8	Injury and near misses management	--	--	10.2
	8.9	Emergency preparedness and response	--	8.2	8.2
--	Performance evaluation		9	9	9
9	9.1	Monitoring, measurement, analysis and evaluation	9.1	9.1	9.1
	9.1.1	Monitoring, measurement, analysis and evaluation of processes	9.1	9.1	9.1
	9.1.2.	Monitoring, measurement, analysis and evaluation of products	9.1	9.1	9.1
	9.1.3	Monitoring, measurement, analysis and evaluation of the environment and safety	--	9.1	9.1
	9.2.	Customer satisfaction	9.1.2	--	--
	9.3	Analysis and evaluation	9.1.3	--	--
	9.4	Conformity assessment	--	9.1.2	9.1.2
	9.5	Internal audit	9.2	9.2	9.2
	9.6	Management review	9.3	9.3	9.3
	9.6.1	Management review input	9.3.2	9.3	9.3
	9.6.2	Management review output	9.3.3	9.3	9.3
10	--	Improvement	10	10	10
	10.1	General	10.1	10.1	10.1
	10.2	Incidents, non-conformities, complaints and corrective actions	10.2	10.2	10.2
	10.3	Continuous improvement	10.3	10.3	10.3

0.2 STATUS OF THE INTEGRATED MANAGEMENT SYSTEM MANUAL EDITIONS

EDITION	REVISION	DATA
01	00	03.09.2021
01	01	14.10.2022
01	02	22.11.2023
01	03	20.08.2024

0.3 REVISION STATUS OF THE SECTIONS OF THE INTEGRATED MANAGEMENT SYSTEM MANUAL

SECTION	TITLE	REVISION					
		00	01	02	03	04	05
0	Manual index, distribution list, Manual editions, Sections' revision	03.09.21	14.10.22	18.09.24			
1	Integrated Management System scope	03.09.21					
2	Normative references	03.09.21	14.10.22				
3	Terms e definition	03.09.21	14.10.22				
4	Context & application field	03.09.21	14.10.22				
5	Leadership & commitment	03.09.21	22.11.23	18.09.24			
6	Planning	03.09.21					
7	Support	03.09.21	18.09.24				
8	Operation	03.09.21					
9	Performance evaluation	03.09.21					
10	Improvement	03.09.21					

0.4 GENERAL

The adoption of the Integrated Quality, Environment and Safety Management System, hereinafter referred to only as IMS, described in this Integrated Management System Manual (MSGI), is a decision of the Management of OCS Officine Costruzioni Speciali Spa, hereinafter referred as OCS, to implement a tool for the sustainable development with potential benefits for all stakeholders and which allows to:

- address the risks and opportunities associated with the context in which OCS operates and the objectives that OCS aims to achieve
- improve business processes and products made
- increase customer satisfaction
- respect the environment and improve environmental performance
- continuously improve occupational health and safety levels
- comply with all applicable legislation, mandatory regulations and voluntary regulations
- In addition to the quality of the products made, OCS is interested in achieving and demonstrating a high level of efficiency in the environmental and health and safety at work.

Therefore, OCS management intends to define and adopt voluntary measures aimed at supporting its company policies and stimulating greater respect for the issues of quality, the environment and safety at work for the benefit of all interested parties.

The general guidelines of the company policies are:

- The unambiguous and clear definition of Customer's needs in order to obtain maximum satisfaction
- Attention to the environment and pollution prevention
- Prevention of diseases and accidents at work
- Compliance with all mandatory legislation

It was therefore decided to implement and apply an IMS compliant with the UNI EN ISO 9001, UNI EN ISO 14001 and UNI ISO 45001 standards as a tool capable of supporting OCS in achieving its policies.

0.5 PRINCIPLES OF QUALITY MANAGEMENT

The 7 principles of UNI EN ISO 9001 that OCS makes its own to improve its performance for quality are:

- **Customer Focus:** OCS depends on its Customers and should therefore understand their present and future needs, meet their requirements and aim to exceed their own expectations
- **Leadership:** Management establishes unity of purpose and direction of OCS, creating and maintaining an internal environment that fully involves the staff in the pursuit of the objectives
- **Active participation of people:** People, at all levels, are the essence of OCS and their full involvement allows them to place their skills at the service of the company
- **Process approach:** A desired result is achieved more efficiently when related activities and resources are managed as a process
- **Improvement:** Improving overall performance is a permanent goal of OCS
- **Evidence-based decision making:** OCS's important decisions are based on the analysis of data and information
- **Relationship management:** The close collaboration between OCS and its stakeholders allows a mutually beneficial relationship to improve the ability to create value

0.6 PROCESSI APPROACH

To meet the requirements, needs and expectations of the various stakeholders (Properties, Customers, Workers, Collaborators, Suppliers, Control Bodies, etc ...), OCS has identified the essential processes that allow this fulfillment and has adopted towards these processes a management that can be defined as a "set of correlated or interacting activities that transform incoming elements into outgoing elements".

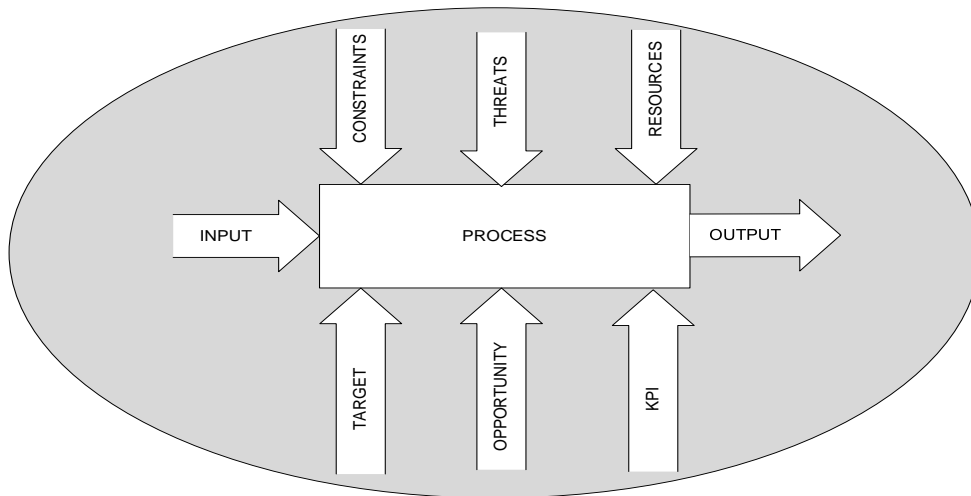
OCS processes have been identified and are managed taking into consideration:

- Process input
- Mandatory legislative and regulatory constraints
- Internal and external resources;
- Threats
- Process output
- Performance indicators
- Opportunity
- Goals

In order to function effectively, the OCS IMS takes into account the interactions between the different processes, in order to continuously maintain global control over the company and allow:

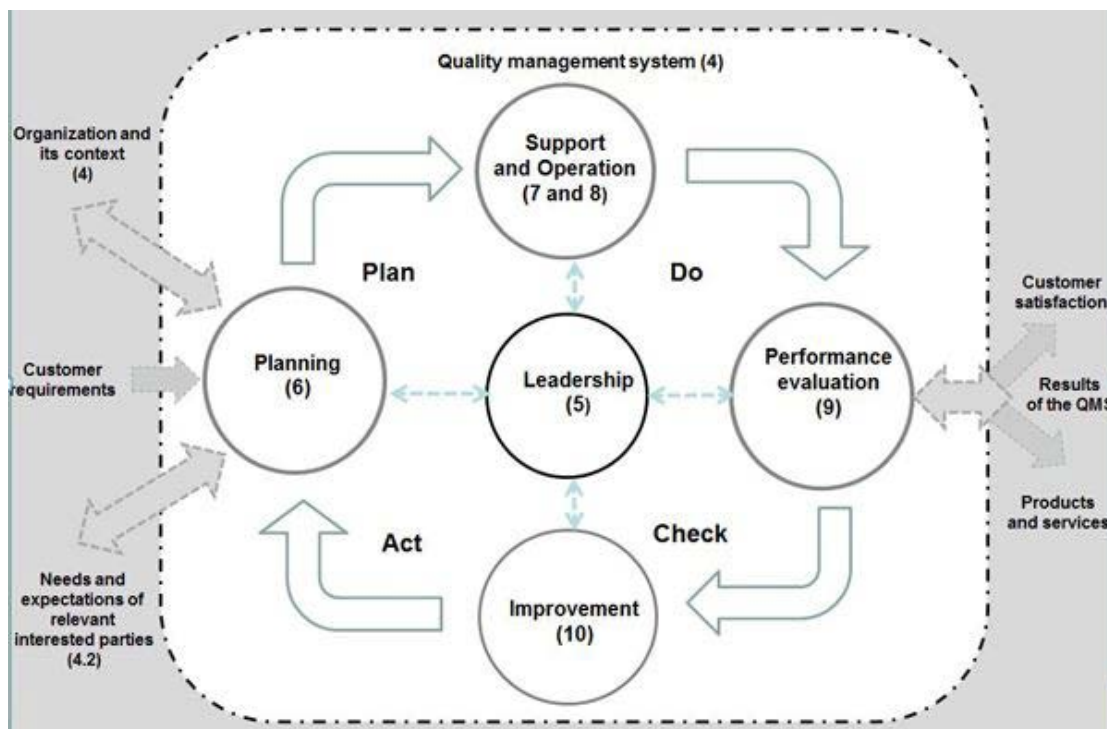
- Understand the requirements and meet them consistently
- Consider processes in terms of added value
- Achieve effective process performance
- Improve processes based on the evaluation of data and information.

Each OCS process can therefore be represented as follows:



The interactions between processes are identified by paying particular attention to the "internal customer" principle when the outputs of a process constitute the input of another process.

To complete the process approach, in OCS the same processes are managed by applying the principles of the "PDCA" model, shown here, in order to pursue continuous improvement.



(Numbers in bracket refer to chapter of UNI EN ISO 9001:2015)

The PDCA model can be briefly described as follows:

Plan: Establish system objectives, processes and resources needed to deliver results in accordance with customer requirements and policies and identify and address risks and opportunities

Do: implement what has been planned

Check: monitor and (when applicable) measure the resulting processes and products and services, against the policies, objectives, requirements and planned activities, and report on the results

Act: Take action to improve performance as necessary.

0.7 RISK BASED THINKING

Another aspect considered by OCS in its IMS is the uncertainty in achieving expected expectations or the risk of not achieving a result, which is expressed in the concept of risk-based thinking.

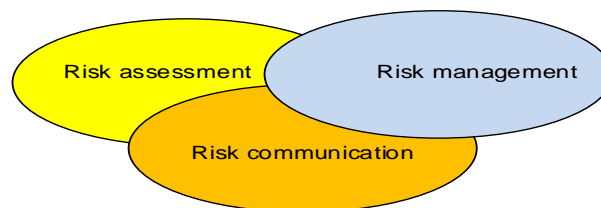
Risk is the effect of uncertainty and any uncertainty can have positive or negative effects.

A positive deviation resulting from a risk may provide an opportunity, but not all positive effects of a risk translate into opportunity.

OCS manages this aspect through a risk analysis process that makes it possible to qualitatively and quantitatively describe the probability and potential impact of certain risks, to formulate decisions or propose alternatives / options for controlling them and to communicate the results to all interested parties. risk assessment and the decisions to be taken, i.e. identifying opportunities with respect to an unfavorable situation to achieve an expected result such as attracting new customers, developing new products, reducing waste or improving productivity, with simultaneous attention to the environment to the safety of workers.

Risk analysis considers three macro aspects:

- Risk Assessment
- Risk Management
- Risk Communication



The 3 aspects are not separate but overlap in part, precisely by virtue of the process of active exchange of data and information between different subjects who participate in the entire analysis process.

Risk assessment - risk assessment process, that is a method that allows you to systematically examine information and data available to arrive at assessing the probability with which a given danger can occur.

Risk management - risk management process, or the decision-making activities undertaken by the company under risk conditions or to deal with any risks analyzed. It is a governance activity inherent in corporate strategies and in the way the company moves to create value, which requires a high level of integration and which involves top management and other company levels.

Risk communication - risk communication process, i.e. the moment of the exchange of information and opinions between those who carry out the risk assessment, the risk manager and other interested parts of the company (e.g. consumers)

The criteria with which OCS faces Risk Based Thinking are described in Section 6 of this Manual.

0.8 COMPATIBILITY WITH OTHER MANAGEMENT SYSTEM STANDARDS

The "High Level Structure" (HLS) criteria contained in the new editions of UNI EN ISO 9001, UNI EN ISO 14001 and UNI ISO 45001 were considered in IMS design, even if OCS isn't yet certified ISO 14001 and ISO 45001.

SECTION INDEX

1.1 INTEGRATED MANAGEMENT SYSTEM SCOPE

MATRIX OF SECTION_1 REVISION

REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01				
02				
03				
04				
05				

1.1 INTEGRATED MANAGEMENT SYSTEM SCOPE

OCS IMS purpose is to provide addresses, requirements and reference documentation for the management of quality, environment and safety in the workplace aimed at:

- develop, pursue and strengthen its corporate policy
- disseminate and improve an adequate culture in its collaborators on the issues considered in the IMS
- demonstrate to the interested parties that the IMS policy, procedures and business practices comply with the requirements of the standards and reference norms adopted
- define IMS programs, objectives, indicators and targets and pursue them efficiently
- satisfy legislative prescriptions, applicable mandatory and mandatory requirements
- plan, control and improve processes and products produced, the working conditions and the available infrastructures
- identify, control and minimize environmental impacts in the workplace
- identify, control and reduce dangers and risks for health and safety in the workplace
- satisfy all customers and all other internal and external interested parties (stakeholders) involved and/or influenced by company performance
- obtain and maintain IMS certification from third-party certification bodies

The purpose of this **Integrated Management System Manual**, hereinafter only **MSGI**, is therefore to briefly describe the IMS adopted by OCS and define its field of application.

The MSGI is made in compliance with the UNI EN ISO 9001, UNI EN ISO 14001 and UNI ISO 45001 standards and aims to be a dynamic reference document capable of describing the management and operational commitment that OCS ensures to improve the Organization, eliminate/mitigate the risks related to safety in the workplace, aiming at the same time to improve processes and products made through respect for the environment and workers.

The MSGI is also a vehicle for the promotion and dissemination of company policy, cultural guidelines and the consequent behaviors to be adopted for a company management consciously aimed at acquiring ever greater competitiveness in the markets, while ensuring maximum protection in terms of safety for workers and parties interested, and the utmost respect for the environment.

In the MSGI are described:

- the elements to be applied to maintain and improve the IMS
- the related and reference documentation for each IMS requirement
- the context, organization and structure of OCS
- the company policy
- responsibilities and resources to manage business processes and activities with global performance improvement
- the ways to make products regularly meeting customers' requirements, the applicable mandatory requirements, improve the customer satisfaction and all other interested parties
- the requirements to give evidence of IMS compliance with the reference standards and with all applicable mandatory legislation about environment and safety
- the references for the traceability of IMS prescriptions and registrations
- the methods for effective and efficient IMS application through continuous improvement processes.

SECTION INDEX

2.1 NORMATIVE REFERENCES

MATRIX OF SECTION_2 REVISION

REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01	14.10.2022	Rif. new standard UNI EN ISO 3834-2:2021		
02				
03				
04				
05				

2.1 REGULATORY REFERENCES AND REFERENCE PUBLICATIONS

The reference standards considered for the IMS are:

- UNI EN ISO 9001: 2015 Quality Management Systems - Requirements.
- UNI EN ISO 14001: 2015 Environmental Management Systems - Requirements and guide for use.
- UNI ISO 45001: 2018 Occupational health and safety management systems – Requirements
- UNI EN ISO 19011: 2018 Guidelines for auditing of Management Systems

The EC Regulation 1221/2009 (2009 November 25th) on voluntary participation of organizations in a Community Eco-management and Audit system (EMAS III) was used as a guideline for the preparation of the Initial Environmental Analysis and for the identification and classification of environmental aspects and impacts.

OCS also applies all the legal, mandatory and voluntary prescriptions consisting of Laws, Regulations, Authorizations, Local, National and International Standards such as those listed below, even if in a non-exhaustive manner:

- Legislative Decree n° 152 (2006/04/03 and subsequent amendments) Environmental regulations
- Legislative Decree n° 81 (2008/04/09 and subsequent amendments) Implementation of art. 1 of Legislative Decree n° 123 (2007/08/03), on the subject of protection and health and safety in the workplace.
- Presidential Decree n° 151 (2011/08/01) Regulation concerning the simplification of the discipline of procedures relating to fire prevention, in accordance with Art. 49, paragraph 4-quater, of the D.L. 31/05/10, n. 78, converted by Law 30/07/2010, n. 122
- Legislative Decree n° 93 (2000/02/25) Implementation of Directive 97/23 / EC on pressure equipment
- Directive 2014/34/EU Harmonization of the laws of the Member States relating to equipment and protective systems intended for use in potentially explosive atmospheres
- EU Regulation 2016/679 Protection of individuals with personal data processing

For activities related to the manufacture of pressure vessels, reactors, tube bundle heat exchangers, towers, steel columns commissioned by customers, the following standards are considered, among others:

- UNI EN 1090-1: 2012 Execution of steel and aluminum structures - Requirements for the conformity assessment of structural components
- UNI EN 1090-2: 2018 Execution of steel and aluminum structures - Technical requirements for steel structures
- UNI EN ISO 3834-2: 2021 Quality requirements for fusion welding of metallic materials - Part 2: Extended quality requirements
- ASME Code Section IX Welding of pressure vessels and piping

OCS also applies Legislative Decree 231/2001 relating to the administrative liability of legal persons and companies, including for crimes attributable to Art. 25-septies (violation of the rules on the protection of safety at work) and by Art. 25-undecies (environmental crimes) introduced by Legislative Decree 121/2011.

Complete and updated lists of all documentation of external origin, consisting of applicable Laws, Standards and Regulations, are available in the "List of Standards and Laws" module.

QHSE ensures that all legal requirements and all other regulatory requirements, even voluntary, applicable are identified, reviewed to verify any repercussions in OCS, recorded and communicated to the subjects, internal and external, of the company who are interested or may be interested.

Section_7 of the MSGI defines the procedures for managing the provisions related to the IMS which are indicated in a "Schedule".

Verification and assessment of compliance with these requirements is described in Section_9 of the MSGI.

SECTION INDEX

3.1 TERMS AND DEFINITIONS

3.2 ACRONYMS

MATRIX OF SECTION_3 REVISION

REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01	14.10.2022	Ref. new standard UNI EN ISO 3834-2:2021		
02				
03				
04				
05				

3.1 TERMS AND DEFINITION

In OCS IMS the following terms and definitions are used, in alphabetical order:

DEFINITIONS DRAWN FROM UNI EN ISO 9001

Outsourcing: Making an agreement in which an external organization performs part of a function or process of an organization

Top Management: Person or group of people who, from the highest level, lead and monitor an organization

Audit: Systematic, independent and documented process to obtain audit evidence and evaluate it objectively, in order to establish how the audit criteria have been met;

Competence: Ability to apply knowledge and skills to achieve the expected outcomes

Compliance: Meeting a requirement

Corrective Action: Action to eliminate a Non-Conformance cause and to prevent its repetition

Effectiveness: Degree of implementation of the planned activities and achievement of the planned results

Indicator: Measurable representation of the condition and achievement of planned results

Documented information: Information that must be kept under control and maintained by an organization and the medium that contains it

Continuous improvement: Recurring activity to increase performance

Measurement: Process of determining a value

Monitoring: Determination of the status of a system, a process and an activity

Non-Conformity: Failure to satisfy a requirement

Objective: Result to be achieved

Organization: Person or group of people having their own functions with responsibilities, authority and interrelationships to achieve their goals

Interested party: Person or organization who can influence, be influenced, or perceive itself as being influenced by a decision or activity;

Policy: Guidelines of an organization relating to quality performance, as formally expressed by its top management

Performance: Measurable results

Process: Set of interrelated or interacting activities that transform input into output

Requirement: Need or expectation that can be explicit, generally implicit, or mandatory

Risk: Effect of uncertainty

Risks and Opportunities: Potential Negative Effects (Threats) and Potential Positive Effects (Opportunities)

Management System: Set of related or interacting elements of an organization aimed at establishing policies, objectives and processes to achieve these objectives

DEFINITIONS DRAWN FROM UNI EN ISO 1090 AND UNI EN ISO 3834

Execution class: Series of categories of specific requirements for the execution of overall works, of a single component or of a detail of a component

Structural characteristics: The properties of the component related to its ability to function satisfactorily under the influence of the actions to which it is subjected. In the EN standard, performance characteristics, load bearing capacity, fatigue strength and fire resistance are defined as structural characteristics together with manufacturing characteristics that influence the structural behavior of the component.

Manufacturing characteristics: These are the execution classes, the welding quality, the geometric accuracy (tolerances) or the surface properties, i.e. all the properties that have an influence on the structural behavior

Structural components: Components to be used as load bearing parts of works designed to provide mechanical strength and stability to works and/or fire resistance, including aspects of durability and functionality under operating conditions, which can be used directly as supplied or they can be incorporated into a construction work

Contract: Construction requirements requested by the Client or the basic specifications of the Constructor when it comes to carpentry performed for Clients at the time of design and production.

Construction: Product, structure or any other welded element.

Execution: All activities carried out for the physical completion of the works, i.e. procurement, preparation and assembly, welding, mechanical connections, transport, surface treatments, checks and related documentation

Manufacturing: Operations to manufacture the component, which may include manufacturing, welding, mechanical fastening, assembly as well as testing and documentation of the declared performance characteristics

Constituent materials: Materials and products used for the production of components and which then remain an integral part of them, for example structural steel products, stainless steel products, mechanical connectors, filler materials for welding

Qualified Personnel: Personnel whose skills and knowledge have been obtained through schooling, training and / or appropriate practical experience.

Preparation: All activities performed on steel products for the production of parts ready for assembly or insertion into components, including identification, handling, storage, cutting, forming and drilling.

Special Process: Process in which the results cannot be fully verified with the inspection and final check of the product in which, for example, any errors or defects during the process can only appear after the product is used. Therefore, continuous monitoring and / or compliance with documented procedures is necessary to ensure that the prescribed quality requirements are met.

Production: All activities necessary for the production and delivery of a component, which include procurement, preparation and assembly, welding, mechanical connections, transport, surface treatments, checks and related documentation

Manufacturing organization: Identified in the Cutting, Bending, Carpentry, Welding, Technical Department and Quality Control Departments

Structural kit: Set of structural components to be assembled and installed on site. Note The assembled system of structural components is a structure

Weldability: Quality of a steel material that allows you to develop a qualified welding procedure.

Execution specifications: Series of documents regarding technical data and requirements for particular steel structures including those specific for the integration and clarification of the rules of UNI EN 1090-2

Component specification: Document or documents that provide all information and technical requirements necessary for the fabrication of the structural component

Welding Specification (WPS): A document that provides details of how a welding operation is to be performed and must contain all necessary information. WPS can cover:

- The creation of a specific joint (thicknesses, materials, etc.)
- The creation of a series of joints, including a certain range of thicknesses to be joined, as well as a range of base or filler materials

Essential Tolerance: Basic limits for a geometric tolerance necessary to meet the design requirements in terms of mechanical strength and stability

Functional Tolerance: Geometric tolerance that may be required to fulfill a function other than mechanical strength and stability, such as appearance and suitability

Production tolerance: Tolerance range granted in the measure of a component dimension which is the result of a component production

Welding Process Qualification Report (WPQR-WPAR): Document that contains all the parameters concerning a test assay and all the results of the tests and controls performed on the assay itself.

Further reference definitions are contained in UNI EN ISO 1090-1: 2012 and UNI EN ISO 3834-2: 2021.

DEFINITIONS DRAWN FROM UNI EN ISO 14001

Top Management: Person or group who, from the highest level, lead and monitor an organization

Environment: Context in which an organization operates, including air, water, soil, natural resources, flora, fauna, humans and their interrelations

Environmental aspect: Element of an activity, product or service of a company that can interact with the environment

Audit: Systematic, independent and documented process to obtain audit evidence and evaluate it objectively, in order to establish how the audit criteria have been met;

Life cycle: Consecutive and interconnected phases of a system of products (or services) from the acquisition of raw materials or the generation of natural resources to final disposal

Competence: Ability to apply knowledge and skills to achieve the expected outcomes

Environmental condition: State or characteristic of the environment as determined at a fixed moment in time

Compliance: Meeting a requirement

Corrective Action: Action to eliminate the cause of a Non-Conformance and to prevent its repetition

Effectiveness: Degree of implementation of the planned activities and achievement of the planned results

Environmental impact: Environmental modification, negative or beneficial, caused totally or partially by the environmental aspects of an organization

Indicator: Measurable representation of the condition and achievement of planned results

Documented information: Information that must be kept under control and maintained by an organization and the medium that contains it

Continuous improvement: Recurring activity to increase performance

Measurement: Process of determining a value

Monitoring: Determination of the status of a system, a process and an activity

Non-Conformity: Failure to satisfy a requirement

Compliance obligations/legal requirements and other requirements: The legal requirements that an organization must meet and other requirements that an organization must or has chosen to meet

Objective: Result to be achieved

Environmental objective: Objective decided by an organization consistent with its environmental policy

Organization: Person or group of people having their own functions with responsibilities, authority and interrelationships to achieve their goals

Interested party: Person or organization who can influence, be influenced, or perceive themselves as being influenced by a decision or activity

Environmental policy: Orientations and guidelines of an organization relating to environmental performance, as formally expressed by its Senior Management

Performance: Measurable results

Environmental performance: Performance relating to the management of environmental aspects

Pollution Prevention: Using processes, practices, materials, products, services or energy sources to avoid, reduce or control (separately or in combination) the production, emission or discharge of any type of pollutant or waste, in order to reduce negative environmental impacts

Process: Set of interrelated or interacting activities that transform input into output

Requirement: Need or expectation that can be explicit, generally implicit, or mandatory

Risk: Effect of uncertainty

Risks and Opportunities: Potential Negative Effects (Threats) and Potential Positive Effects (Opportunities)

Management System: Set of related or interacting elements of an organization aimed at establishing policies, objectives and processes to achieve these objectives

Environmental Management System: Part of the Management System used to manage environmental aspects, fulfill compliance obligations and address risks and opportunities

DEFINITIONS DRAWN FROM UNI ISO 45001

Outsourcing: Entering into an agreement by which an external organization performs part of a function or process of the organization

Top Management: Person or group of people who, at the highest level, lead and monitor an organization

Contractor: External organization that provides services to the organization in accordance with the agreed specifications, terms and conditions

Audit: Systematic, independent and documented process to obtain audit evidence and evaluate it objectively in order to establish to what extent the audit criteria are met

Corrective Action: Action to eliminate the causes of a Non-Conformity or accident and to prevent its recurrence

Competence: Ability to apply knowledge and skills to achieve the expected results

Compliance: Meeting a requirement

Consultation: Seek advice before making decisions

Effectiveness: Degree of implementation of the planned activities and achievement of the planned results

Accident / Injury: An event resulting from a job or that originates in the course of a job and which could cause or cause injury or illness

Documented information: Information that must be kept under control and maintained by an organization and the medium that contains it

Continuous improvement: Recurring activity to increase performance

Worker: Person who carries out a job or activity under the control of the Organization

Injury and Illness: Negative Effects on a Person's Physical, Mental, or Cognitive Condition

Workplace: Place of the organization, where a person needs to be or go for work reasons

Measurement: Process of determining a value

Monitoring: Determining the status of a system, process or activity

Non-Conformity: Failure to satisfy a requirement

Objective: Result to be achieved

Occupational Health and Safety Objective: Objective set by the organization to obtain specific results in line with the Occupational Health and Safety policy

Opportunities for Occupational Health and Safety: Circumstance or series of circumstances that may lead to improvement in terms of occupational health and safety performance

Organization: Person or group of people with their own functions with responsibilities, authority and relationships to achieve their goals

Interested party: Person or organization who can influence, be influenced, or perceive themselves as being influenced by a decision or activity.

Participation: Involvement in decision making

Danger: Source with the potential to cause injury and disease

Occupational Health and Safety Policy: Policy to prevent work-related injuries and diseases, for workers and to provide safe and healthy workplaces

Performance: Measurable results

Performance in terms of Health and Safety in the workplace: Performance in terms of the effectiveness of the prevention of injuries and diseases for workers and the provision of safe and healthy workplaces

Procedure: Specified way to conduct an activity or process.

Process: Set of interrelated or interacting activities that transform input into output

Legal requirements and other requirements: Legal requirements that an organization must meet and other requirements that an organization must or has chosen to meet

Requirement: Need or expectation that can be explicit, generally implicit or mandatory

Risk: Effect of uncertainty

Occupational Health and Safety Risk: Combination of the probability that one or more dangerous events or exposures occur in relation to work and the severity of injuries and diseases that may be caused by the event or exposures.

Management System: Set of correlated or interacting elements of an organization aimed at establishing policies, objectives and processes to achieve these objectives

Occupational Health and Safety Management System: Management system or part of a management system used to achieve the Occupational Health and Safety policy

DEFINITIONS DRAWN FROM D.LGS. 2008 APRIL 08 N° 81

Worker: Person who, regardless of the type of contract, carries out a work activity within the Organization of a public or private Employer, with or without pay, even for the sole purpose of learning a trade, an art or a profession, excluding domestic and family service workers. The worker thus defined is equivalent to: the worker member of a cooperative or company, even de facto, who lends his activity on behalf of the companies and the body itself; the associate in participation referred to in Art. 2549 of the Civil Code; the beneficiary of the training and orientation internship initiatives referred to in Art. 18 of Law 196/197, and referred to in specific provisions of the regional laws promoted in order to create moments of alternation between study and work or to facilitate professional choices through direct knowledge of the world of work; the student of the educational and university institutes and the participant in professional training courses in which laboratories, work equipment in general, chemical, physical and biological agents are used, including equipment equipped with video terminals limited to the periods in which the pupil is effectively applied to the equipment or laboratories in question; the volunteer, as defined by Law 266/1991; volunteers from the National Fire Brigade and Civil Protection Corps; the volunteer who carries out the civil service; the worker referred to in Legislative Decree 468/1997

Employer: The person in charge of the employment relationship with the Worker or, in any case, the person who, according to the type and structure of the organization in which the Worker carries out his activity, has the responsibility of the organization itself or of the production unit as it exercises decision-making and spending powers.

Company: The complex of the structure organized by the public or private Employer

Manager: Person who, by virtue of professional skills and hierarchical and functional powers adequate to the nature of the assignment conferred on him, implements the directives of the Employer by organizing the work activity and supervising it

Person in charge: Person who, by virtue of professional skills and within the limits of hierarchical and functional powers appropriate to the nature of the assignment assigned, supervises the work activity and guarantees the implementation of the directives received, checking their correct execution by the Workers and exercising functional power of initiative

Prevention and Protection Service Manager: Person possessing the skills and professional requisites referred to in Art. 32 of Legislative Decree 81/2008 designated by the Employer, to which it responds, to coordinate the Risk Prevention and Protection Service

Prevention and Protection Service Assistant: Person possessing the skills and professional requisites referred to in Art. 32 of Legislative Decree 81/2008, which is part of the Prevention and Protection Service

Medical Doctor: Doctor in possession of one of the qualifications and training and professional requirements referred to in Art. 38 of Legislative Decree 81/2008, which collaborates, in accordance with the provisions of Art. 29, paragraph 1, of Legislative Decree 81/2008 with the Employer for the purposes of risk assessment and is appointed by the same to carry out health surveillance and for all other tasks provided for in Legislative Decree 81/2008

Workers' Safety Representative: Person elected or designated to represent Workers with regards to aspects of health and safety at work

Risk Prevention and Protection Service: Set of people, systems and means external or internal to the company aimed at preventing and protecting Workers from occupational risks

Health surveillance: Set of medical documents, aimed at protecting the health and safety of the Workers, in relation to the work environment, professional risk factors and the methods of carrying out the work activity

Prevention: The set of provisions or measures necessary also according to the particularity of the work, experience and technique, to avoid or reduce occupational risks while respecting the health of the population and the integrity of the external environment

Health: State of complete physical, mental and social well-being, not consisting only in the absence of disease or infirmity

Health and safety promotion system: Complex of institutional subjects that contribute, with the participation of the social partners, to the implementation of intervention programs aimed at improving the health and safety conditions of workers

Risk assessment: Global and documented assessment of all risks for the health and safety of the Workers present in the organization in which they work, aimed at identifying

Danger: The inherent property or quality of a given factor with the potential to cause harm

Risk: Probability of reaching the potential level of damage in the conditions of use or exposure to a given factor or agent or to their combination

Production unit: Establishment or structure aimed at the production of goods or the provision of services, with financial and functional technical autonomy

Technical standard: Technical specification, approved and published by an international organization, a European body or a national standardization body, compliance with which is not mandatory

Good practices: Organizational or procedural solutions consistent with current legislation and good practice standards, adopted voluntarily and aimed at promoting health and safety in the workplace by reducing risks and improving working conditions, developed and collected by the Regions, by the Higher Institute for Prevention and Safety at Work (ISPESL), by the National Institute for Insurance against Accidents at Work (INAIL) and by the joint bodies referred to in art. 51 of Legislative Decree 81/2008, validated by the Permanent Advisory Commission pursuant

to art. 6 of Legislative Decree 81/2008, following the technical investigation of the ISPESL, which ensures the widest dissemination

Guidelines: Acts of guidance and coordination for the application of the legislation on health and safety prepared by the Ministries, the Regions, the ISPESL and the INAIL and approved at the Permanent Conference for relations between the State and the Regions and the Autonomous Provinces of Trento and Bolzano

Training: Educational process through which to transfer to the Workers and other subjects of the company prevention and protection system knowledge and procedures useful for the acquisition of skills for the safe performance of their respective tasks in the company and for the identification, reduction and management of risks

Information: Set of activities aimed at providing knowledge useful for identifying, reducing and managing risks in the workplace

Practical training (addestramento): Complex of activities aimed at making Workers learn the correct use of equipment, machines, systems, substances, devices, including personal protective equipment, and work procedures

Organization and management model: Organizational and management model for the definition and implementation of a company policy for health and safety, pursuant to art. 6, paragraph 1, letter a), of Legislative Decree 8 June 2001, n. 231, suitable for preventing the crimes referred to in articles 589 and 590, third paragraph, of the Criminal Code, committed in violation of the accident prevention and health protection regulations at work

Joint Bodies: Bodies set up on the initiative of one or more employers 'and employers' associations that are comparatively more representative on a national level, as privileged venues for: the planning of training activities and the elaboration and collection of good practices for prevention purposes; the development of actions relating to health and safety at work; assistance to companies aimed at implementing the relevant obligations; any other activity or function assigned to them by law or by the relevant collective agreements

Corporate Social Responsibility: Voluntary integration of the social and ecological concerns of companies and organizations into their business activities and their relationships with stakeholders

3.2 ACRONYMS

To facilitate the reading of the Integrated Management System documents, abbreviations or acronyms may be used which will be indicated in the documents themselves together with the meaning of the acronym used.

IMS Integrated Management System
MSGI Integrated Management System Manual

SECTION INDEX

- 4.1 THE ORGANIZATION AND ITS CONTEXT
- 4.2 THE NEEDS AND EXPECTATIONS OF INTERESTED PARTIES
- 4.3 INTEGRATED MANAGEMENT SYSTEM APPLICATION FIELD
- 4.4 INTEGRATED MANAGEMENT SYSTEM AND RELATED PROCESSES

MATRIX OF SECTION_4 REVISION

REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01	14.10.2022	Changing in par. 4.1.4		
02				
03				
04				
05				

4.1 THE ORGANIZATION AND ITS CONTEXT

To identify potential problems that may affect the ability to supply products that comply with the Customer's requirements and / or with laws and regulations, OCS has defined the context in which it operates, identifying the factors, external and internal, to be considered in order to manage hazards and threats in order to pursue their own policies and strategies.

OCS considers the context as "the general scenario within which it carries out its processes, defined by a series of components / factors that determine a system of constraints-opportunities within which it will have to find its business development". The context factors taken into consideration are:

EXTERNAL FACTORS	INTERNAL FACTORS
ENVIRONMENTAL	ENVIRONMENTAL
CUSTOMERS	FINANCIAL AND ECONOMIC
COMPETITION AND THE MARKETS	LEGAL AND REGULATORY
PROVIDERS	GUIDELINES AND STRATEGIES
LEGAL AND REGULATORY	PROCESSES, PRODUCTS AND SERVICES
BANKS AND FINANCIAL INSTITUTIONS	RESOURCES, SKILLS AND KNOWLEDGE
POLICY	HEALTH AND SAFETY AT WORK
COMPUTER NETWORK	INFORMATIC SYSTEMS
SOCIAL AND CULTURAL	SOCIAL AND CULTURAL
TECHNOLOGICAL	TECHNOLOGIES

Each one of these factors is associated with several elements of potential danger / threat that must be identified and assessed.

The details on the factors of the context in which OCS operates and on the associated dangers / threats are reported in the "Dashboard Risk Context" used to carry out the subsequent risk assessment with the criteria indicated in point 6.1. of Section_6 of this MANUAL.

4.1.1 OCS DESCRIPTION

O.C.S. OFFICINE COSTRUZIONI SPECIALI S.p.A. founded in 1970 by the engineer Giancarlo Ravagnan, with more than 50 years of experience offers to its customers a complete service of Pressure Equipment for Power, Oil & Gas industries.

Since XXI century OCS has increased its competitiveness in design and fabrication, specially in heavier and higher thickness Pressure Vessels fabrication: Reactors, Columns, Towers, Shell & Tube Heat Exchangers, Steam Drums, WHB, PGB, Desalters, Deaerators, Oil Recovery Technologies and PSA.

In a way of constant improvement, OCS in 2016 acquired the management of Nuova Tubital, an historical company which started its activity in 1954, creating TUBITAL S.R.L., granting a new strategic location near the port of Marghera (Venice).

The registered office and production site of OCS are in Albignasego, Padua, in Strada Battaglia, 167.

Today OCS has 74 employees, of which 34 are administrative and technical office employees.

4.1.2 OCS PRODUCTS AND MARKETS

OCS designs and manufactures, on behalf of Customers, pressure equipment for the Oil & Gas sector, in particular reactors, absorbers, columns, towers and heat exchangers and is particularly competitive in the manufacture of equipment with large thicknesses and large dimensions (up to to 250 t) in carbon steel, stainless steel, nickel, alloy and low alloy steels and plated materials.

It also deals with the design and manufacture of water treatment equipment such as: DISCOIL® (oil separator for water / oil separation), CPI (Corrugated Plate Interceptor), IGF / IAF (Induced Gas/Air Flotator), NSF (Nut Shell Filter) , Hydrociclones.

Thanks to its strategic position with the controlled Tubital near the Port of Marghera (VE), it is able to ship all over the world.

OCS is able to offer a complete product to customers, ranging from mechanical design to complete manufacturing up to non-destructive testing.

OCS customers are large engineering companies, the so-called "EPCs" or end customers such as refineries, petrochemical and chemical plants.

4.1.3 OCS PROCESSES AND TECHNOLOGIES

OCS performs processing on steel materials consisting of carbon and stainless steel, nickel and aluminum alloys which involve the use of:

- Cold rolling machines for profiles with thicknesses up to 50 mm and 3,000 mm wide
- Vertical lathes (up to Ø 2.950 mm x 2.000 mm high)
- Automatic machine for plasma and flame cutting
- Manual and automatic welding machines GTAW, SMAW, SAW, GMAW, FCAW, ESW
- Head coating welding machines with ESW
- Automatic tube to tube plate welding machines
- Pipe expansion machines
- Rotating positioning tables
- Welding rotators up to 300 tons (roller conveyors)
- Sandblasting and painting area (36 x 7 x 7 m)
- Gas oven for heat treatment (20 x 6 x 6 m)
- GBC400 automatic grinder
- Overhead cranes, forklifts and transporters
- Static and self-propelled mobile cranes
- Self-lifting trolleys

4.1.4 CERTIFICATIONS AND AUTHORIZATIONS OF OCS

The site has the permissions and authorizations necessary for the exercise of its activities such as:

- Authorization of atmospheric emissions and water discharges
- Certificate of viability

While the Fire Prevention Certificate is being obtained.

OCS is in possession of the certifications:

- UNI EN ISO 9001
- ISO 3834-2
- EN 1090
- ASME STAMP- symbol U, U2, S
- Certificate of authorization for the construction and export of stationary pressure vessels and boilers to Korea.

The achievement of UNI EN ISO 14001 and UNI ISO 45001 certifications is planned for 2023.

4.1.5 GEOGRAPHICAL AND TERRITORIAL LOCATION OF OCS

Albignasego is an Italian town of 27.000 inhabitants in the province of Padua in Veneto. It is an integral part of the metropolitan area of the city of Padua and is the second largest municipality in the province by population, after the capital.

Albignasego borders to the north with the municipality of Padua, to the south with the municipality of Maserà di Padova, to the east with the municipality of Ponte San Nicolò and Casalserugo, to the west with the municipalities of Abano and Montebelluna Terme.

The site of Strada Battaglia 167 is identified on Sheet 4, Map 5 of the census of the Municipality of Albignasego (PD), intended for "compatible productive activity included in the urban area" and has an area of approximately 33,000 square meters, of which approximately 8,500 of spaces covered (offices, production and logistics) and 24,500 of uncovered spaces.

Borders to:

- North with private ownership
- South with Via delle Industrie (industrial area)

- East with private land
- West with Via Battaglia (SS Adriatica n ° 16).

The plant is located at number 167 of Via Battaglia, the state road that runs along the homonymous Battaglia canal that connects the area of Padua South (Bassanello) with the various municipalities of the lower area: the first one you meet is precisely Albignasego, a municipality in which it is located OCS.

The area is located in the industrial area of Albignasego.

The territory, at 13 m a.s.l., is completely flat and has a temperate climate with an average rainfall / year of about 994 mm (source ARPAV).

4.2 THE NEEDS AND EXPECTATIONS OF THE INTERESTED PARTIES

The relevant stakeholders that OCS takes into consideration to manage possible repercussions, negative or positive, from identified dangers and threats can be identified in:

- **Ownership:** Partners
- **Customers:** in the oil & gas, petrochemical, food, naval and treatment sectors
- **Employees:** personnel who work in various capacities in OCS
- **Suppliers:** of goods, materials and services
- **External company:** local community, control and administrative bodies, financial and insurance institutions, trade and trade union associations, NGOs

Information relating to their relevant expectations is reported in the "Risk Stakeholders Dashboard", used to carry out the subsequent risk assessment indicated in point 6.1. of Section_6 of this MANUAL.

4.3 INTEGRATED MANAGEMENT SYSTEM APPLICATION FIELD

Given the context in which OCS operates and the interested parties involved in its activities, the provisions contained in this Manual are applied to:

Design and production of pressure vessels for chemical and petrochemical plants, for energy production and gas treatment and of equipment and systems for water treatment and recover floating hydrocarbons (Discoil® oil skimmer)

The contents of this Manual are applied across the board at all levels of the OCS organization and in particular are applied to:

- internal and external processes and activities, over which OCS exercises or can exercise control;
- past, real and potential environmental aspects and impacts over which OCS exercises or can exercise control and activities aimed at respecting and improving the environment;
- safety risks inherent in routine, non-routine and emergency activities over which OCS exercises or can exercise control and actions aimed at improving safety in the workplace;
- human resources available and the Suppliers who supply materials or who work on behalf of OCS
- infrastructures, plants, machines, equipment and measuring instruments used;
- activities that contribute to achieving and maintaining compliance with environmental and safety legislation and voluntary regulations;
- activities that contribute to achieving the Policy, objectives and goals defined by the Management.

OCS does not deem the requirement 8.5.5 "Post delivery activities" to be applicable.

4.4 INTEGRATED MANAGEMENT SYSTEM AND RELATED PROCESSES

OCS has established and maintains a documented IMS taking into account the need for application, updating and continuous improvement of its effectiveness, in compliance with the requirements of the reference standards and its own corporate policy statement.

The elements of the IMS are described in this Manual and in the documents referred to therein.

The index of Section_0 of this Manual clarifies the scheme used to meet the requirements of the reference standards by indicating, for each element of the IMS, the correlation between Sections of the MSGI and Paragraphs of the standards.

The IMS contains prescriptions, which in addition to identifying every single OCS process, allow to know the interactions existing between the different activities in order to ensure that:

- The processes are effective and kept under control;
- The resources and information necessary for the management and monitoring of the processes are collected and made available;
- Processes are monitored, measured and analyzed;
- Actions to achieve planned results and continuous improvement are implemented.

Furthermore, the contents of the IMS also have as their primary objective the prevention of health and safety in the workplace, the prevention of pollution actually or potentially originating from the company, the satisfaction of customers and all other interested parties.

In fact, the Management of OCS believes that, through a correct application of the IMS, it ensures:

- Full compliance with all legal requirements and applicable voluntary regulations concerning the significant environmental aspects of the site's activities and the risks related to health and safety in the workplace;
- That significant environmental impacts and risks to health and safety in the workplace are taken into account in establishing plans and objectives for improvement for the environment and safety.

Therefore, the OCS IMS also allows you to:

- Identify the activities, products, plants, infrastructures, services that give or can give rise to significant environmental impacts and / or risks related to health and safety in the workplace;
- To manage the site, activities, products, plants, infrastructures and services according to planned methods and with an adequate organizational structure, to achieve the established objectives and goals;
- Monitor and measure the achievement of the planned objectives and targets;
- Periodically review the adequacy and effectiveness of the IMS to identify and determine plans and actions for environmental, safety and quality improvement.

OCS has divided the processes of its Organization into three categories:

- DIRECTIVES** which are of general direction and orientation;
- BUSINESS/CORE** that affect the result of the activities that give added value to the products made;
- SUPPORT** for management, consolidation and improvement of core processes

Management processes establish policies, opportunities, objectives and resources in the short, medium and long term through reviews and improvement plans.

Core or business processes are identified in the management:

- Commercial
- Design and development
- Procurement, which includes the sub-processes of managing Suppliers and Contractors;
- Design and development of metal components
- Manufacturing of equipment through the steps provided for in the scope

Finally, the Support processes are identified in the management of:

- Human resources;
- Maintenance;
- Tests, checks and inspections;
- Surveillance and measurements for safety and the environment
- Management of monitoring and measurement devices;
- Warehouse and handling
- Emergencies;
- Non-conformities, complaints, accidents / injuries
- IMS audits

- Management of documents and registrations of the IMS;
- The analysis of performance data for the management review
- Corrective Actions.

For each Core and Support process, the Manager is identified, the Functions that have the task of collaborating and documented Procedures / Instructions may be available.

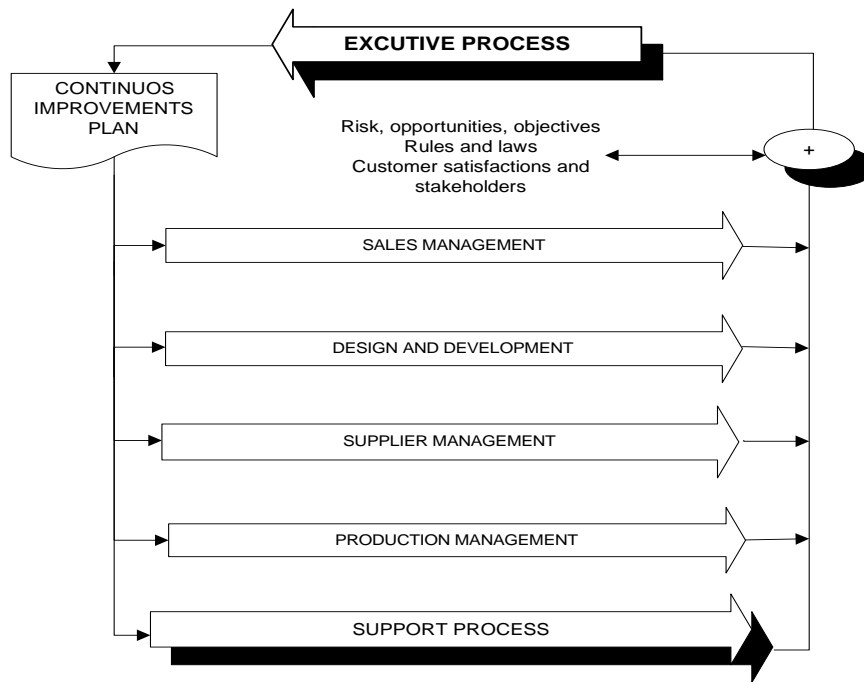
Some processes can be entrusted to contractors depending on the type of product such as:

- Welding
- Sandblasting
- Painting
- Destructive tests

Contractors are provided with all the documentation for the execution of the entrusted process / processing, with the references, the control requirements, the acceptance and validation parameters required.

The controls on these processes can be delegated to the Contractor and / or performed by OCS personnel.

The processes identified and planned in OCS can be summarized as follows:



The sequences and interactions between processes are described in detail in the management documentation of the individual processes, while the interactions between the individual processes are summarized in the table on the next page.

INTERACTION TABLE OF COMPANY PROCESS	EXECUTIVE PROCESS	SALES MANAGEMENT	DESIGN AND DEVELOPMENT	SUPPLIER MANAGEMENT	PRODUCTION MANAGEMENT	SUPPORT PROCESS
EXECUTIVE PROCESS		•	•	•	•	•
SALES MANAGEMENT	•		•	•	•	•
DESIGN AND DEVELOPMENT	•	•			•	•
SUPPLIER MANAGEMENT	•	•	•		•	•
PRODUCTION MANAGEMENT	•	•	•	•		•
SUPPORT PROCESS	•	•	•	•	•	

OCS plans the manufacture of the equipment required by the Customer according to its policy and objectives (as defined in Section_6), the necessary and available resources (Section_7) and the operating methods adopted (Section_8), ensuring consistency with the requirements defined in the other processes Leadership, Core and Support. The decisions to improve the effectiveness and adequacy of the IMS, the policies, objectives, goals, plans and programs for improvement are the responsibility of the Management that uses the information returned from audits and periodic reviews performed by QHSE.

The formal and current declaration regarding the company policy for quality, environment and safety at work is reported in Section_5 of MSGI.

In order to allow the pursuit of its own policies, objectives and targets, the Management undertakes to provide the resources, skills and technologies to implement and control the Integrated Management System, ensuring the training and training needs of personnel and the involvement of Suppliers.

SECTION INDEX

5.1 LEADERSHIP AND COMMITMENT

5.1.1. FOCUS ON CUSTOMER

5.2 COMPANY POLICY

5.3 ROLES, RESPONSIBILITIES AND AUTHORITIES

5.3.1 EMPLOYER

5.3.2 HEALTH & SAFETY MANAGER /PREVENTION & PROTECTION SERVICE MANAGER

5.3.3 MEDICAL DOCTOR

5.3.4 H&S MANAGER (DIRIGENTI PER LA SICUREZZA)

5.3.6 H&S OFFICER (PREPOSTI PER LA SICUREZZA)

5.3.6 REPRESENTATIVE OF WORKERS FOR SAFETY (RLS)

5.3.7 IMS MANAGER

5.3.8 SUPERVISORY BODY

5.4 PARTICIPATION AND CONSULTATION

MATRIX OF SECTION_5 REVISION

REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01	22.11.2023	New functional organization chart		
02	18.09.2024	Change functional organization chart, insertion of new Company Policy (sec. 5); Change par. 7.2 and 7.3		
03				
04				
05				

5.1 LEADERSHIP AND COMMITMENT

OCS Management believes that its commitment is essential and a stimulus for the development and maintenance of an effective and efficient IMS capable of managing any threats and dangers and producing benefits for all interested parties.

Therefore OCS Management:

- Assumes the responsibilities and obligations necessary to prevent illnesses and injuries to workers and to provide healthy and safe working environments and activities
- Provides resources to ensure the effectiveness of the Integrated Management System;
- Ensures that the company policy and the objectives of the IMS are established and that they are compatible with the context and with the strategic guidelines of OCS
- Supports the integration of IMS requirements into the organization's business processes, through the process approach and Risk-Based Thinking
- Communicates the importance of effective business management and compliance with the IMS requirements;
- Ensures that the IMS achieves the expected results
- Involves, guides and supports workers so that they actively contribute to the effectiveness of the IMS also through participation and consultation and do not suffer retaliation in the event of reports of accidents, dangers, risks and opportunities
- Supports other relevant management roles in demonstrating their leadership and how it applies to their respective areas of responsibility
- Encourages the creation and activity of health and safety teams
- Promote improvement

5.1.1 FOCUS ON CUSTOMER

OCS Management believes that the satisfaction of the Customer's needs and expectations can be pursued by identifying, defining and verifying the explicit (requests) and implicit (expectations) requirements of the requested products.

In fact, the uniqueness of these requirements allows you to plan activities and therefore keep the products manufactured always in line with new expectations, including reliability, performance and regulatory compliance.

Therefore, the management of Customer in OCS is entrusted to the Sales Manager who has the task of:

- Ensure an adequate network of contacts with the Customer
- Define all the product requirements requested by the Customer
- Acquire feedback from the Customer, understand their satisfaction and plan improvement actions

The attention to the Customer is therefore concretized with the activities carried out in determining the requirements relating to the products (Section_8 § 8.2.2) and Customer satisfaction (Section_9 § 9.1.1).

5.2 COMPANY POLICY

OCS company policy is defined by the Management, represents a dynamic and constantly evolving business reality and is considered part of the business strategies.

The policy is used as a tool to direct OCS towards the continuous improvement of the processes and products made, while aiming at respecting safety in the workplace and the environment through indicators, objectives and improvement programs.

The corporate policy declaration currently in force in the OCS plants has the purpose of:

- Spreading the vision, values, guiding principles and general objectives regarding the quality of the products manufactured, the environment and safety
- Formalize the commitments aimed at a reasonable and constant improvement of corporate efficiency, with a view to reducing negative effects on the environment and safety, and improving customer satisfaction and all interested parties
- Ensure the commitment to pursue compliance with applicable environmental and occupational health and safety laws and regulations and all other requirements such as agreements, protocols, declarations, conventions and recommendations signed with the interested parties

- Provide a reference framework to periodically review company objectives and goals and establish new improvement plans and programs
- Be documented, updated and operational, disseminated to all staff and available to the public

To keep faith with this declaration, the Management carries out periodic reviews to ascertain whether:

- The Policy is constantly consistent with corporate strategies, appropriate to the nature, size, activities and products manufactured, to the safety risks and to the environmental impacts generated
- The policy is understood and shared at all levels of the Organization
- The performance indicators identified are relevant and adequate to provide the information necessary to pursue business improvement
- Information at all levels is adequate regarding the objectives, goals and programs established
- The resources made available are adequate for the objectives and targets set
- Previous objectives and milestones have been achieved and, if not, the reasons for this deficiency
- The pursuit of continuous improvement in business processes, in work for third parties, in the environment and in safety is effectively pursued and implemented

Company policy statement is displayed in the workplace and any changes are communicated through meetings and information meetings, on the occasion of periodic reviews.

Company Policy Statement currently in force is shown at the end of this section.

5.3 ROLES, RESPONSIBILITIES AND AUTHORITIES

OCS Management believes that well-defined and known structure and responsibilities are essential for the development and maintenance of an effective and efficient IMS capable of producing economic, environmental and safety benefits for all parties involved.

This Organization is expressed in a graphic representation or functional organization chart in which the relationships and levels of responsibility of the various company functions can be deduced.

For each Function / Role included in the Organization Chart:

- The requirements of competence, experience, level of education, knowledge, specializations and qualifications are identified, if required
- Duties, duties, relationships with other Functions and any qualification and periodic re-qualification requirements are defined

This information is defined in specific job descriptions.

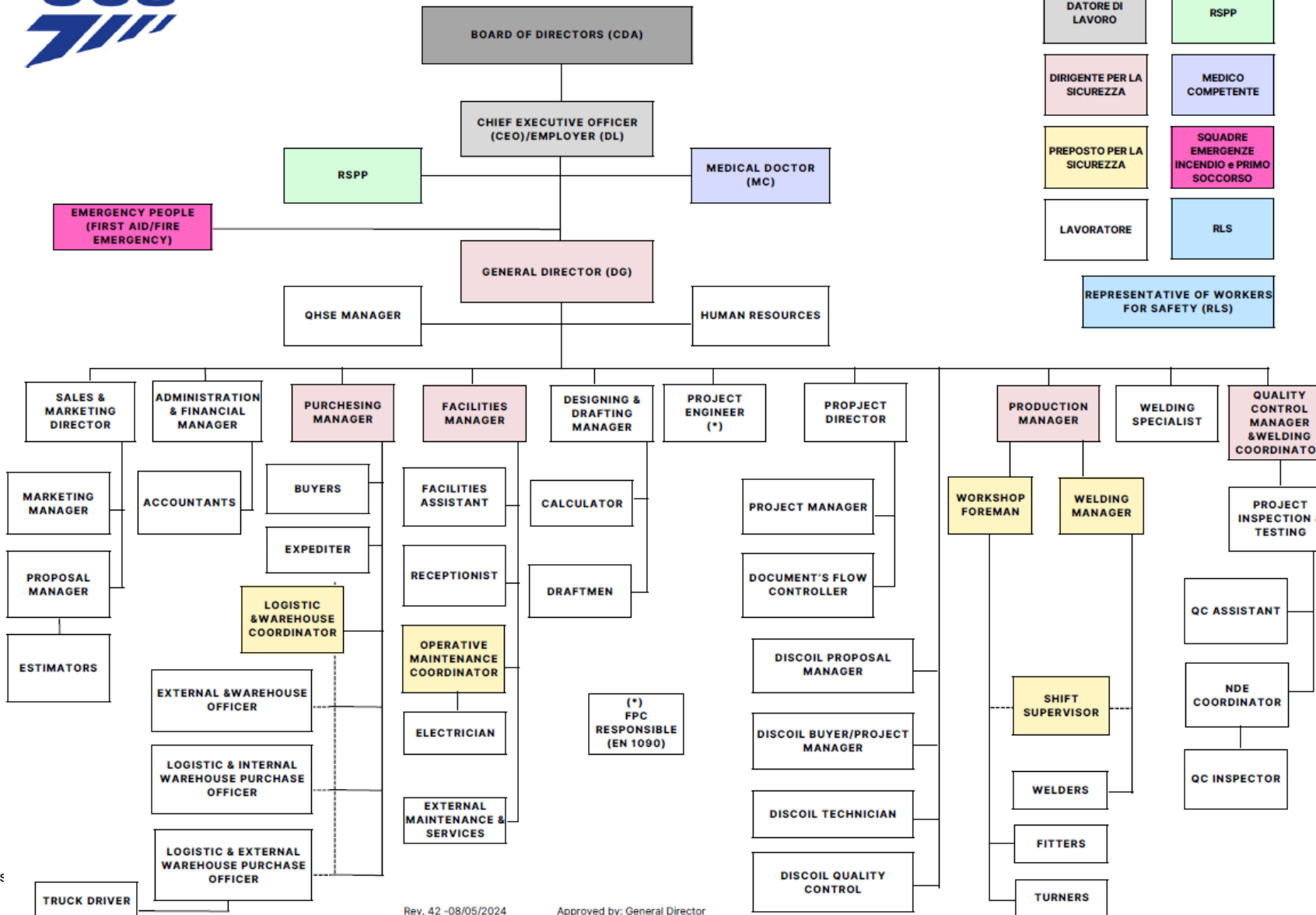
For safety purposes, the Employer has identified the mandatory figures and assigned the relative roles, based on the definitions contained in Legislative Decree 81/08.

Below is the functional organization chart of OCS.



ORGANIZATION CHART

D.Lgs. 81/08



The nominative organization chart is displayed in the OCS workplaces.

The roles and duties of the mandatory functions in the health and safety area or required by the reference standards for the IMS are summarized below.

5.3.1 EMPLOYER

The Employer, as required by Art. 17 of Legislative Decree 81/08, has the undeniable task of carrying out the assessment of risks for health and safety in the workplace and appointing the Prevention and Protection Service Manager.

5.3.2 PREVENTION AND PROTECTION SERVICE MANAGER

The Prevention and Protection Service Manager (RSPP) is appointed by the Employer and must perform the tasks set out in Art. 33 of Legislative Decree 81/08 or:

- Collaborate with the Employer in identifying and assessing the dangers and risks for safety and health in the OCS workplace and in drafting the Risk Assessment Document, keeping it updated over time
- Collaborate with the Employer and the Coordinating Doctor to identify preventive and protective measures according to the identified safety risks and the related control systems
- To elaborate, in collaboration with QHSE and with the competent Department Managers, the safety procedures related to all company activities that involve safety risks
- Propose, in collaboration with QHSE, the Medical Coordinator and the Workers' Safety Representatives (RLS), training, information and personnel training programs
- Collaborate with the Employer, Competent Doctor, RLS, QHSE and the Responsible Department Managers, when purchasing new equipment / machines / products, to identify any shortcomings / dangers regarding safety inherent in these assets and possibly update the Risk Assessment Document and / or propose alternatives
- Perform periodic inspections, in collaboration with the Competent Doctor, in the workplace to check their status and identify the need to update the Risk Assessment Document
- Participate in management reviews on the IMS, also possibly in conjunction with the periodic meetings provided for by Art. 35 of Legislative Decree 81/08, to communicate the performance achieved with regard to safety, identify risk mitigation plans and programs, define new objectives and targets for safety

5.3.3 MEDICAL DOCTOR

The Company Doctor has the following duties regarding health and safety in the workplace:

- Collaborate with the Employer and RSPP in the assessment of all the risks of the work activity in the relevant plant
- Collaborate with RSPP in choosing the most suitable PPE for the protection of the health and safety of workers, according to the business risks
- Ensure the timely implementation of the Health Protocol

5.3.4 H&S MANAGER (DIRIGENTI SICUREZZA)

They are identified by the Employer and have the task of implementing the directives received from the Employer by organizing the work activity and establishing working rules and procedures.

5.3.5 H&S OFFICER (PREPOSTI SICUREZZA)

They are identified by the Employer and have the task of checking that the work performed by workers in their area / department of competence is carried out according to the established rules and working procedures

5.3.6 REPRESENTATIVE OF WORKERS FOR SAFETY

The Workers' Representatives, elected by them, have the task of managing the powers indicated in Art 50 of Legislative Decree 81/08, participating in the risk assessment and subsequent necessary updates.

5.3.7 QHSE MANAGER

QHSE has the task, responsibility and authority to:

- Implement, disseminate and keep the IMS active
- Ensure that the requirements of the IMS are identified, defined, applied and maintained in accordance with the reference standards
- Ensure and verify compliance with legislation and all other applicable mandatory and voluntary requirements;
- Disseminate the company policy
- Maintain relations with certification bodies / bodies and other interested parties
- Manage the training and training needs of personnel, in collaboration with the competent Functions
- Plan, schedule and ensure the execution of internal audits on the IMS
- Collect and process data and results regarding the application of the IMS
- Report to the Management the performance of the IMS to allow the review of the system itself in order to identify objectives, goals and improvement programs

5.3.8 SUPERVISORY BODY

The Supervisory Body (ODV) appointed pursuant to Art. 6 letter b of Legislative Decree 231/01 has the following duties and powers:

- Performs periodic audits on the IMS in relation to the provisions of Legislative Decree 231/01
- Monitors compliance with the duties and duties of each Department indicated in their respective job descriptions for health and safety and the environment
- Carry out random / surprise inspections at the company structures considered at risk of crime for health, safety and the environment to check that the activity is carried out in compliance with the IMS adopted and in compliance with the applicable legislation, with the aim of verifying and ensure the effectiveness of the IMS itself
- Objectively judges the effectiveness of the IMS, in relation to the corporate structure and the ability to prevent the commission of crimes relating to safety and the environment
- Requests the Management to proceed with the disciplinary sanctions envisaged, in case of violation of the IMS by the responsible parties
- Checks the timely implementation of the disciplinary sanctions issued

5.4 PARTECIPATION AND CONSULTATION

To obtain the active participation of all personnel in the pursuit of the highest levels of safety, the Management ensures training actions and an adequate flow of internal and external communications.

The personnel in the workplace is:

- Represented by the Workers' Safety Manager (RLS);
- Informed about the organization of the Prevention and Protection Service;
- Sensitized to report near misses and any potential or real safety issues
- Consulted by RLS on changes in work environments that impact worker safety
- Involved in the development of procedures and instructions for the management of health and safety risks

In OCS there are constantly open channels for the dissemination of information regarding safety management at all organizational levels, as better defined in the previous paragraphs.

As regards the consultation, the SG provides that the Workers' Safety Representative (RLS) is consulted in advance and in a timely manner on the occasion of:

- DVR updates and identification, planning and implementation of preventive measures
- Information from security services
- Designation of the Prevention and Protection Service staff and of the emergency management staff (fire and first aid)

- Organization of worker training
- Organization of the Management review during which the periodic meeting is also held pursuant to Art. 35 of Legislative Decree 81/08

Similarly, the RLS consults the Employer, the RSPP or the Department Managers, according to their skills, regarding:

- Elaboration, identification and implementation of new or more adequate prevention measures
- Observations during checks by the competent authorities or during audits
- Identification of new risks for safety and health in the workplace



Policy for Quality, Safety, Environment and Energy

To seek maximum economic development, OCS is committed to improve its processes and the quality of the produced products, but is also mindful to the environment and safety at work, to reduce negative effects on the environment and on humans, preventing injuries and diseases through the control of hazards and risks at work, also through consultation with the Workers' Safety Representative.

The adopted system in OCS provides an approach based on the logic of "risk-based thinking", which allows to identify dangers and threats that could generate risks in company processes and give opportunities for improvement.

The organization is based on strong and shared values such as trust, respect and transparency in relationships with customers, suppliers and all stakeholders in general; several years of sector knowledge in which it operates is the essential element that guides decisions and choices to reduce risks towards ever greater efficiency.

OCS considers these values essential to achieve the excellence objectives that sets for itself, and to be a recognized responsible company, on a social, environmental and energy level, in the territory to which it belongs.

Therefore the Company has adopted as its own the management principles for quality, for environmental protection, pollution prevention and recently also for careful and monitored management of its energy performance, in compliance with ISO 9001, ISO 14001 and ISO 45001, even if at the moment certified only according to the ISO 9001 standard, but with the aim of achieving the other certifications over the next three years.

The company policy is actually expressed in the following principles

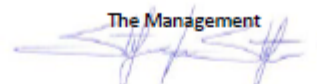
- *understand and analyze the context in which it operates in order to guarantee the interested parties efficient and punctual activities and services in full compliance with safety and environmental protection regulations and a rational and conscious use of energy, using suitable means and processes;*
- *operate in full compliance with the technical and legislative standards that regulate the sector as well as those requested by the Customer and those on the use of energy;*
- *conceive, design, develop and manage the provided service in order to control risks, i.e. in order to prevent accidents or reduce their consequences for workers, the local population and the environment;*
- *satisfy customer requests, responding promptly to their needs and market changes;*
- *assist customers by ensuring a constant and timely flow of information relating to the services offered in order to avoid the commission of crimes or actions that in some way harm the environment and the safety of people;*
- *evaluate the environmental impacts linked to the activities and the product supplied by adopting management procedures that ensure that plants and processes offer the greatest protection for the environment;*
- *optimally manage the waste collected and produced, ensuring maximum commitment to promote recycling and recovery;*
- *evaluate the processes, through a timely energy analysis, analyzing data and monitoring consumptions in order to progressively improve company performance relating to energy use;*
- *raise awareness and train all staff, according to role and function, in order to make them responsible and orient them towards procedures, habits and behaviors that respect company policy and organization;*
- *bear up communication at all company levels and with partners, recognizing them as a fundamental integral part of company activities;*
- *work to ensure the achievement of improvement objectives through adequate planning and constant control of the implementation phases of the envisaged services, including the procurement of products and services that impact the Company's energy performance.*

Convinced that quality, environmental management, careful energy management and continuous improvement are the only direction to follow, given the constant evolution of the market, the Management considers everyone's personal contribution essential and hopes that the Culture of quality, respect for the environment, and the conscious use of energy resources become one of the characterizing elements for the organization's staff, ensuring constant commitment of all functions to achieve the Company objectives.

This Policy is shared with every department and at all decision-making and operational levels.

Periodically, during management system reviews, this Policy is reviewed, together with the company objectives and, if necessary, revised.

Albignasego, 2024 August 20th

The Management




O.C.S. OFFICINE COSTRUZIONI SPECIALI S.P.A.
STRADA BATTAGLIA, 107 - 35020 ALBIGNASEGO (PADOVA) - ITALY - PH. +39 049.8071511 - FAX. +39 049.8071512
CCIAA PADOVA ISCR., C.F. AND VAT: IT00220580286 - REA: PD-612 - SHARE CAPITAL: € 900.000 I.V.
www.ocs.it

SECTION INDEX

6.1 ACTIONS TO ADDRESS RISK AND OPPORTUNITIES

6.1.1. ENVIRONMENTAL ASPECTS

6.1.2 HAZARD IDENTIFICATION, RISK AND ASSESSMENT OF RISK AND OPPORTUNITIES

6.1.3 COMPLIANCE DUTIES, LEGAL & OTHER REQUIREMENTS TO FIX

6.1.4 PLANNING ACTIVITY

6.2 COMPANY OBJECTIVES

6.2.1 PLANNING TO ACHIEVE COMPANY OBJECTIVES

6.2.2 PLANNING TO CHANGE MANAGEMENT PROGRAMS

MATRIX OF SECTION_6 REVISION				
REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01				
02				
03				
04				
05				

6.1 ACTIONS TO ADDRESS RISK AND OPPORTUNITIES

Planning corporate activities, OCS considers the characteristics of its organization, the internal and external context in which it operates and the expectations of all interested parties.

In this scenario, OCS identifies the dangers both in the context in which it operates and with respect to the difficulty of guaranteeing the needs and expectations of the interested parties.

The assessment also considers the scenarios, with related dangers and risks, in case of changes and for the outsourced activities as specified in Section_8 of the MSGI.

Dangers are reported in "Risk - Context Dashboard" and "Risk - Stakeholders Dashboard".

For each hazard identified, the probability of occurrence, the resulting damage and the consequent level of risk, that can be judged "acceptable" or "unacceptable", are assessed.

Based on the level of risk identified, OCS assesses whether:

- it is necessary to plan and implement proportionate actions to prevent or eliminate the source of risk by intervening on the probability of occurrence or on the resulting damage
- accept the risk and identify suitable improvement actions

The documented information relating to the assessments are reported in "Risk - Context Dashboard" and "Risk - Stakeholders Dashboard".

6.1.1 ENVIRONMENTAL ASPECTS

Once defined, OCS will use the results of the Initial Environmental Analysis (AAI) as a starting point to analyze the direct and indirect environmental aspects on which the site and its activities impact or can impact significantly and negatively.

Those aspects generated by the activities of OCS over which one has or can have total control are considered direct environmental aspects.

Environmental aspects not generated directly by OCS on which it is not possible to exercise total controls are considered indirect.

Identifying and evaluating the environmental aspects, the life cycle prospects of the products manufactured are also considered.

In summary are also considered the aspects related to:

- Acquisition of energy products and resources
- Maintenance activities at the headquarters
- Performance of suppliers
- Transportation
- Impact of products manufactured and placed on the market

For each aspect and related impact identified, a Significance Class (CS) is assigned considering:

- the probability of occurrence
- the severity of the consequences
- the level of reversibility for the environment
- the degree of legislative compliance
- the criticality for the interested parties
- the level of control

The process of identifying the environmental aspects / impacts is implemented through the information and data contained in the Initial Environmental Analysis.

The identification of environmental aspects, direct and indirect, and the assessment of the significance of the related impacts is essential for the definition of environmental policies, objectives, goals and improvement programs.

The significant environmental aspects can be considered negative environmental impacts and therefore threats for OCS or positive impacts and therefore opportunities.

The environmental aspects and impacts of OCS are reported in the file "Evaluation of environmental impact aspects".

6.1.2 HAZARD IDENTIFICATION, RISK AND ASSESSMENT OF RISK AND OPPORTUNITIES

OCS Employer implements the policy for the control and improvement of health and safety conditions in which employees, suppliers, visitors and all other interested parties present in the workplace for various reasons are concerned, using the results of the assessment of the risks contained in the Risk Assessment Document (DVR).

The DVR contains criteria for the continuous identification and proactive assessment of critical points intended as hazards and risks and the prevention and protection measures to eliminate, reduce or control the risks associated with the identified hazards.

The criteria indicated in the DVR also take into account:

- work organization, social factors (e.g. workload, hours, harassment, harassment, intimidation), leadership and culture in the company
- of routine and non-routine activities and situations, including the dangers deriving from:
 - infrastructures, equipment, materials, substances and physical conditions of the workplace
 - product and / or service design, research, development, production, assembly, construction, maintenance and disposal
 - human factors
 - work activities
- of accidents occurring inside and / or outside the company
- even potential emergency situations
- of people, or of:
 - those who have access to workplaces and their activities, including workers, contractors, visitors
 - those who, in the vicinity of the workplace, may be influenced by the activities of the organization
 - workers in a workplace not under the direct control of the organization
- the design of work areas, processes, installations, machines, equipment, work and organizational procedures, including the needs for adaptation and the skills of the workers concerned and involved
- situations that occur in the vicinity of the workplace caused by work-related activities under the control of the organization
- situations not monitored by the organization and occurring in the vicinity of the workplace, which can cause injury and illness to people in the workplace
- actual or proposed changes by the company in operational or management activities, in knowledge and information on hazards

Risks related to the establishment, implementation, operational activity and maintenance of the IMS must be taken into consideration.

The assessment activity may involve the involvement of specialists in the sector to identify the dangers and assess the existing risks taking into account the Protective Measures (MDP) present and the controls already implemented.

Subsequently, an opportunity intervention plan is defined for:

- improve health and safety performance and the Safety Management System
- adapt the work, organization and working environment to their workers
- eliminate the dangers and reduce the risks to health and safety

The assessment activity, in addition to the main figure of the Employer, involves the involvement of all interested parties including the Head of the Prevention and Protection Service and the Competent Doctor and the Workers' Safety Representative.

The Risk Assessment Document (DVR) is updated following:

- Modification or introduction of new technologies
- Introductions of new machines, equipment, plants and substances or modification of existing ones
- Modification of production processes or layouts
- Introduction of new regulatory obligations
- Injury phenomena including near misses
- Requests for corrective and preventive actions
- Reports of any origin
- Other interventions

6.1.3 COMPLIANCE DUTIES, LEGAL & OTHER REQUIREMENTS TO FIX

QHSE verifies and manages the compliance obligations of OCS through sources such as Databases, Official Journals, Trade Associations, Control Bodies and Consultants, to be updated on the applicable Laws, Standards and Regulations, on all legal and regulatory requirements and obligations, deadlines and the recipient body.

All the legislation and regulations applicable in OCS are reported in the "List of laws and regulations" file, while the prescriptions are managed with a "Schedule".

For each legislative and prescriptive update, QHSE, assisted by the Department Managers concerned and by any Consultants, immediately checks for any repercussions on:

- the environmental aspects and impacts of the site and the products manufactured
- the dangers and risks for the health and safety of workers
- the programs and objectives and targets established by the Management

The compliance obligations relevant to workers are communicated by email, company bulletin board and / or with the RLS.

6.1.4 PLANNING ACTIVITY

In IMS planning, the necessary actions are considered to face and manage:

- the significant environmental aspects of the site and products
- the risks to health and safety in the workplace
- emergency scenarios
- the obligations of legislative and mandate compliance;
- the risks and opportunities identified in the context and stakeholder analysis.
- measurement and monitoring activities
- the support processes
- performance evaluation
- the objectives set.

In the planning activities, the technological options, the financial requirements, the necessary and available skills, the operational aspects to manage are considered.

6.2 COMPANY OBJECTIVES

Management identifies one or more indicators for quality, the environment and safety and for each indicator the objectives and targets that must be achieved in a given period are defined.

This information is reported in the "Improvement Program Plan" approved by the Management and disclosed internally.

The information necessary to plan the improvement can be extrapolated from feedback information such as:

- Data on the satisfaction of the Customer and interested parties
- The state of legislative compliance for the environment and safety
- The actual results achieved by OCS
- the company policy
- The results of measurements and monitoring emerged from the IMS records
- Data for management reviews

With regard to the definition of specific objectives for improving safety in the workplace and the environment, the results of the Safety Risk Assessments and the results of the Initial Environmental Analysis are taken into consideration.

Furthermore, for health and safety, the improvement objectives identified in the periodic meetings Art. 35/81 indicated in the minutes of the meeting are considered.

For each improvement objective, the Management sets measurable goals to be achieved in a defined period of time which are communicated to the competent functions.

The improvement objectives may concern, for example:

- The reduction or elimination of elements and factors that are dangerous to the environment and to the health and safety of workers and other interested parties
- The management and control of possible environmental and safety risks generated by the Suppliers to whom OCS addresses
- The quantitative reduction of waste and the optimization of materials / products used in the production cycle
- The quantitative reduction of energy resources used
- The preparation, the skills and the degree of "culture" regarding the environment and personnel safety.

6.2.1 PLANNING TO ACHIEVE COMPANY OBJECTIVES

QHSE collected data about monitored performance indicators are processed and presented to the Management during the Management Reviews and allow the Management to plan the achievement of the objectives and targets

expected in the "Improvement Program Plan" in which the actions are established to be undertaken, the necessary resources, the Functions in charge of implementation and the timing of implementation.

The "Improvement Program Plan" is communicated within OCS with meetings and meetings attended by the departments involved.

During the Management Reviews it is verified whether the objectives and targets have been achieved or not and to what extent, any causes that prevented them from being achieved, the proposals and the need for improvement or modification.

6.2.2 PLANNING TO CHANGE MANAGEMENT PROGRAMS

Any need to change the IMS involves all the departments concerned, in order to ensure the maintenance of compliance and adequacy and to avoid systematic repercussions that could compromise the effectiveness of the IMS itself.

The IMS is promptly updated and modified according to internal and / or external developments, in order to be suitable to new needs.

In OCS the situations that can determine these needs can be:

- Changes in company policies
- Changes in the status of hazards and risks for safety in the workplace
- Changes in environmental aspects and impacts on the site and / or products
- New legislative and / or regulatory requirements, or changes to existing requirements
- New goals and milestones or changes to already established goals and targets
- Changes and additions to improvement programs
- Changes in the organizational structure
- Requests from the market and / or "interested parties"
- New activities / processes / equipment / plants / methods / products / raw materials / substances / layout / site extensions or their modifications
- Improving and accessible technological innovations
- Results of surveillance and measurement activities
- Examination of non-conformities and complaints
- Results of internal audits and audits of certification bodies
- Data analysis and periodic reviews
- Accidents and emergency situations that have occurred and / or potentially identified or of which we have become aware of similar situations

QHSE verifies whether such events or situations influence or may influence the elements of the IMS or the "Improvement Program Plan" and, if so, defines and initiates the necessary actions on the system, possibly through extraordinary management reviews and / or actions corrective and / or preventive measures to be implemented in factories.

All changes are agreed between all the departments concerned to ensure the maintenance of compliance and adequacy and avoid situations that could compromise the effectiveness of the system.

SECTION INDEX

- 7.1 RESOURCES
 - 7.1.1. PEOPLE
 - 7.1.2 INFRASTRUCTURES
 - 7.1.3 ENVIRONMENT FOR THE FUNCTIONING OF PROCESSES
 - 7.1.4 RESOURCES FOR MONITORING AND MEASUREMENT
 - 7.1.5 ORGANIZATIONAL KNOWLEDGE
- 7.2 COMPETENCE
- 7.3 AWARENESS
- 7.4 COMMUNICATION
 - 7.4.1. INTERNAL AND EXTERNAL COMMUNICATION
- 7.5 DOCUMENTED INFORMATION
 - 7.5.1 CREATING AND UPDATING
 - 7.5.2 CONTROL OF DOCUMENTED INFORMATION

MATRIX OF SECTION_7 REVISION				
REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01	18.09.2024	Revision of par. 7.2 and 7.3		
02				
03				
04				
05				

7.1 RESOURCES

In order to achieve its corporate policies, to constantly improve the efficiency and effectiveness of its IMS, the Management of OCS has identified, defined and made available the financial, human and technological resources that have an influence on the processes, products made, on the environment, on the risks to health and safety at work in the company.

During the review of the IMS and the definition and updating of the objectives, the Management assesses the need to acquire new resources, to improve or integrate existing ones and assigns the competent Functions the task of using the resources made available to achieve the established.

From this analysis and definition work, OCS is able to continuously improve the management of its IMS and to update it according to the needs of the Customers and other interested parties, the applicable legislative and voluntary requirements, the dynamics in safety matters and environment, of the results achieved.

7.1.1 PEOPLE

The need to acquire new human resources are functional to production increases, the need for specialized skills, turnover, replacement, regulatory compliance, etc.

Personnel who carry out activities that affect the products' quality and who carry out activities in which there are or can be foreseeable risks to health and safety in the workplace and / or environmental pollution phenomena are trained to acquire autonomy in carrying out the process / service in which it is inserted and must perform the tasks envisaged, for the assigned role, in the relative "Job Description" which also contains the risks relating to the safety of the job and the DPI in use.

The skills correspondence of OCS employees with the requirements of the assigned role is evidenced in the documents that make up the personal file of each employee.

Any gaps with respect to the required skills are managed as indicated in paragraph 7.2 below.

7.1.2 INFRASTRUCTURES

For processing on steel materials consisting of carbon and stainless steel, nickel and aluminum alloys, OCS has:

- Cold rolling machines for profiles with thicknesses up to 50 mm and 3,000 mm wide
- Vertical lathes (up to \varnothing 2.950 mm x 2.000 mm high)
- Automatic machine for plasma and flame cutting
- Manual and automatic welding machines GTAW, SMAW, SAW, GMAW, FCAW, ESW
- Head coating welding machines with ESW
- Automatic tube to tube plate welding machines
- Pipe expansion machines
- Rotating positioning tables
- Welding rotators up to 300 tons (roller conveyors)
- Sandblasting and painting area (36 x 7 x 7 m)
- Gas oven for heat treatment (20 x 6 x 6 m)
- GBC400 automatic grinder
- Overhead cranes, forklifts and transporters
- Static and self-propelled mobile cranes
- Self-lifting trolleys

In addition to a covered workshop department for the manufacture of equipment, with a total covered area of about 7500 square meters, OCS has:

- Office building
- Warehouses
- Canteen and changing rooms
- Thermal, electrical and pneumatic utilities
- Chemical-physical plant for waste water treatment

In OCS the infrastructures are registered in a management software and the maintenance evidences are recorded in the relative "Equipment/machinery sheet" within the management software.

7.1.3 ENVIRONMENT FOR THE FUNCTIONING OF PROCESSES

The equipment made in OCS does not require particular atmospheric, safety and environmental conditions.

In any case, OCS keeps the conditions necessary to guarantee conformity in the manufacturing process under control and ensures that all the precautions foreseen in terms of health and safety in the workplace and the environment are used to guarantee the best conditions of heat, humidity, brightness and air exchange and maximum attention is paid to cleanliness and hygiene.

In the workplace, all economically accessible measures are applied to ensure the safety of workers, with the use of devices and systems that guarantee adequate environmental conditions with regard, for example, to welding fumes and noise emissions.

There are no particular environmental conditions to be kept under control for the materials used.

The Employer, QHSE, RSPD and the competent Functions must ensure that the personnel have the necessary PPE, IMS documents to perform the assigned tasks under controlled conditions, instructions and information for the protection of people, the environment of work and the external environment.

7.1.4 RESOURCES FOR MONITORING AND MEASUREMENT

The devices used for the monitoring and checks provided for by the "Fabrication Plan" and the "Manufacture and Inspection Test Plan" consist of measuring and indicating instruments.

Indication tools allow you to determine the presence / absence of a parameter or physical quantity.

Using specific conditions and methods, measuring instruments make it possible to determine a parameter or a physical quantity with a defined degree of accuracy.

The instruments used are included in the "List of instruments" updated by Quality Control and consist of:

- Primary / sample instruments
- Test tools
- Instruments installed on welders and ovens

The instruments are calibrated according to the frequencies and deadlines indicated in the "EXHIBIT 17 List of instruments" while the results of the internal calibrations are reported in the "EXHIBIT 19 Calibration report" by CQ.

If the calibration is performed externally at calibration centers, upon returning to OCS Srl, the calibration certificate is checked by QC to verify if calibration results comply with the expected acceptance criteria.

The Operating Instruction "Management and control of measuring instruments" defines the methods for the calibration of each instrument included in the "Instrumentation list".

7.1.5 ORGANIZATIONAL KNOWLEDGE

The experience and knowledge of OCS employees is a heritage of successes and failures, to be preserved to prevent negative repercussions on their processes and on the compliance of their services in cases of:

- staff turnover
- missing or incomplete transmission, acquisition or sharing of information.

This aspect is one of the business risks considered in OCS and which is managed through:

- archiving of internal data and documents (e.g. know-how, projects, work procedures and practices, knowledge acquired in the field, emergencies) and external (e.g. regulations, legislation, conferences, courses, knowledge deriving from customers, suppliers, third parties parties, external events) during daily activities
- preventive support in the event of the turnover of "key" personnel to acquire operations and unwritten information
- where possible, support / collaboration of several resources with key personnel so that the experiences and knowledge are not in the possession of a single person
- where possible, turnover and interchangeability of duties between operational staff

In OCS all the experiences and knowledge possessed are available:

- in the IT systems in the company, which are guaranteed access to the relevant functions
- on the occasion of meetings and meetings at the necessary levels also to compare acquired experiences.

These tools allow the Management to evaluate the level and quality of the knowledge possessed and to establish how to fill any gaps through decisions taken during the management review.

7.2 COMPETENCE

For its IMS functioning, OCS has defined the company structure in terms of roles, skills, knowledge and skills, which is updated according to:

- Skills, characteristics and profiles of the necessary roles;
- Qualification criteria, if any, periods of validity of the qualification
- Needs, including future ones, to replace managers and the workforce;
- Present and future productive potential;
- Obligatory figures to comply with any mandatory requirements.

It is necessary that all employees are equipped with adequate skills and abilities to perform the tasks envisaged by the assigned role, so that their work does not create or may create dangers to their health and safety and that of other people present in the places of work, environmental pollution and deviations from the expected quality requirements. *The skills of each function are defined in the "Job Skills Matrix" file. This document is used as a standard for search, selection and evaluation of candidates.*

Each role is associated with a person possessing the characteristics required by the role itself or similar requirements, whose evidence (curriculum, educational qualifications, certificates, etc.) is kept by Human Resources.

The company organization chart highlights the matching between role and person.

The assignment of roles may include adequate training, not exclusively technical, aimed at providing the required skills and qualifications.

For new hires, the characteristics are assessed with interviews and selections, evaluation of school and work training experiences, trial periods and coaching, etc.

For the staff already in force, the training status is verified, in relation to the requisites required by the role, providing additional activities, if necessary, to align the mandatory and / or system training debts.

Training is managed with the "Company training plan" defined in the first quarter of the year and periodically updated by the HR and QHSE offices.

Training courses are recorded in the "Personnel management" database; furthermore, if internal, they are formalized in the "Training report", if external, where required, training certificates are issued by the training body.

7.3 AWAREWNESS

OCS is aware that adequate motivation and awareness of personnel are indispensable conditions for the achievement of its policies and the improvement of company performance.

Mechanisms are therefore activated to make everyone aware of the importance of their role in relation to the objectives / goals and programs established and how their business contributes to their achievement.

In OCS, the involvement and growth of personnel about IMS issues are encouraged through:

- The assignment of roles, responsibilities and authorities;
- Plans and training, training and coaching activities;
- Performance objectives required by the individual roles;
- Dangers, risks and environmental aspects concerning one's job
- Information on the consequences of incorrect behavior and possible repercussions on the company and other workers and / or the environment
- Ability to identify dangerous situations that require removal from the workplace
- Causes and behaviors that caused accidents / injuries
- The near misses reported and the need to report them
- Open exchange of communications and involvement in the choice of objectives and goals;
- Creation of the best possible conditions in the workplace;
- Analysis of staff needs and reasons for satisfaction and / or lack of loyalty to the company

OCS, to the extent of its competence, seeks the involvement and awareness of Suppliers as well, with the dissemination of its policies, the formal request to carry out the tasks assigned in a responsible manner and according to internal procedures and the verification of their performance.

An annual assessment of both objectives and technical and transversal skills is carried out by the Managers on their collaborators.

In contract changes phases (e.g. end of apprenticeship, end of internship, end of fixed-term contract) an assessment of the skills acquired is carried out by the Manager, in collaboration with senior colleagues/tutors.

7.4 COMMUNICATION

The communication process towards all the parties involved aims to be transparent and understandable and has the purpose of transmitting attention and information to the interested and involved subjects and to sensitize them on the expected quality of the products manufactured, on the safety risks and the related environmental impacts to the products made.

7.4.1 INTERNAL AND EXTERNAL COMMUNICATION

In OCS it is a consolidated practice that all Employees can contact their Manager without particular formalities in order to foster a mentality of mutual collaboration aimed at continuous improvement.

Communications from OCS to its Employees and externally are managed according to the following plan.

TOPIC	WHEN	WHO COMMUNICATE	HOW	WITH WHOM
Company policies	Strategic changes	Management	Internet site Company boards	All stakeholders
Commitments, objectives and goals for improvement	Yearly	Management	Management reviews and improvement plans, intranet	Stakeholders
Amendments and changes in IMS	Changes to IMS procedures	QHSE Manager	Meetings, training minutes, intranet	Involved functions
Commercial aspects	Following requests for new products	Commercial Manager	Meetings, quotations	Customers
Design aspects	Each new job	Project Manager	Meetings, intranet	Stakeholders
Procurement	Each new job	Purchasing Dept	Meetings, intranet	Stakeholders
Production	Each new job	Production	Meetings, intranet	Stakeholders
Environmental aspects	In the event of organizational changes, new procedures or legal requirements	QHSE Manager	Meetings, training minutes, intranet, signs	Involved functions
Significant environmental accidents and / or emergencies	Immediately upon the occurrence of the event	Who detects the event	By voice	Emergency workers
	Within 24 hours in case of danger of pollution of the site	Management	By phone, fax	Municipality, Province, Region and ARPA

TOPIC	WHEN	WHO COMMUNICATE	HOW	WITH WHOM
Security aspects	In the event of organizational changes, new procedures or legal requirements	RSPP and/or Management	DVR, meetings, training minutes, intranet, signs	Involved functions
	In case of services or works on the site	RSPP and/or Management	DUVRI, POS, PSC, contracts, orders, coordination minutes, signs, procedures	External companies, Client
Accidents	Immediately upon the occurrence of the event	Who detects the event	By voice	Emergency workers
	Within 48 from receipt of the Medical Certificate	Human Resources	Informatic system	INAIL
Feedback, investigations on dangerous events and / or accidents / injuries	Following these events	RSPP	Meetings, training minutes, intranet	Stakeholders
Internal audit results, by OdV	After audit	QHSE Manager	Meetings, training minutes, intranet	Stakeholders

All OCS staff can communicate and/or report elements, situations, dangers, etc. about the environment by contacting their manager.

If the communications concern actual situations that create or that may create inconvenience and/or impact on people and / or the environment, the same are referred to QHSE Manager that reported in the "Non-Conformity Report".

In any case, the decisions regarding the report made are communicated to the interested party.

7.5 DOCUMENTED INFORMATION

The documents that make up the IMS structure are divided into 2 types.

Internal documents of the Integrated Management System

- Health and Safety Risk Assessment Document;
- Initial Environmental Analysis;
- Corporate Policy Statement
- Integrated Management System Manual
- Procedures
- Operating Instructions
- Specifications
- Registration Forms.

Documents of external origin, legal requirements and others

- Correspondence with the Customer of a commercial nature;
- Laws, standards and technical rules applicable to the processes, materials and services provided
- Authorizations, Permits, correspondence with Control and Administration Authorities;
- Prescription documents on safety, environment and emergency management;
- Floor plans, diagrams, layouts, Safety Data Sheets, User and maintenance manuals for machines and systems;
- Certificates, certifications, external registrations of training and / or medical activities;
- Test reports, Technical reports, investigations and other documents.
- Catalogs and Brochures of Suppliers.

All internal documents that make up the IMS are included in a "List of SGI documents" while the applicable standards and laws are available in a "List of standards and laws".

7.5.1 CREATING AND UPDATING

In OCS the responsibility for the IMS documents management is in charge of QHSE Manager who manages all the documentation ensuring that:

- All documents are approved for adequacy before their issue;
- Documents are reviewed and updated when necessary;
- Each document bears the identification of the changes and / or the current revision status;
- The documents used in the workplace are available in the updated revisions;
- The documents are easily legible and traceable;
- Documents of external origin are identified and distributed in an updated form;
- Outdated documents are not used that are adequately identified if they are to be kept for historical memory.

Each company Function is responsible for the documentation in its possession, for its conservation and traceability, as well as for informing QHSE in case of need for changes.

The Management has the task of approving the IMS manual and the Procedures.

7.5.2 CONTROL OF DOCUMENTED INFORMATION

IMS registration documents are evidence of the development and effective functioning of OCS's activities in accordance with the required requirements.

These documents, on paper or electronic format, are managed by QHSE and/or by the Functions that originated them which guarantee according to their own needs and / or legal requirements:

- Identification;
- Availability;
- Protection;
- Conservation;
- Destination;
- Archiving;
- Deletion at the end of the retention period.

SECTION INDEX

- 8.1 OPERATIONAL PLANNING AND CONTROL
- 8.2 REQUIREMENTS FOR PRODUCTS
- 8.3 DESIGN AND DEVELOPMENT OF PRODUCTS
- 8.4 CONTROL OF EXTERNALLY PROVIDED PROCESSES, PRODUCTS AND SERVICES
- 8.5 PRODUCTION AND SERVICE PROVISION
- 8.6 RELEASE OF PRODUCTS
- 8.7 CONTROL OF NON-COMPLIANT PRODUCTS
- 8.8 INJURY AND NEAR MISSES MANAGEMENT
- 8.9 EMERGENCY PREPAREDNESS AND RESPONSE

MATRIX OF SECTION_8 REVISION

REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01				
02				
03				
04				
05				

8.1 OPERATIONAL PLANNING AND CONTROL

OCS plans the production and the work phases according to the Customers' requests, ensuring consistency with the requirements defined in the Core and Support processes (indicated in Section_4 of the MSGI) and with its own policies and objectives.

The processes are planned considering:

- The person in charge of the process and the limits of responsibility
- The risks and opportunities identified in the context and among the parties involved in the process
- The real and potential environmental aspects and impacts related to processes and products
- The dangers and risks for safety at work inherent in the individual production phases and related activities
- Incoming materials and energy resources, infrastructures and materials and products leaving the process, including waste and emissions
- The indicators and objectives of the process necessary to highlight its effectiveness and the ability to meet the required requirements
- The incoming data (input) necessary to activate the process and the results / outgoing data (output)
- Availability of human resources and infrastructure
- Availability of indications for the execution of processes and processes and the required monitoring, inspection and testing activities
- Evidence and records capable of demonstrating compliance of the process and products with the established requirements.

The Core processes are flanked by the Support processes, defined in Section_4 of this MSGI, in order to ensure their correct management through:

- Competent, trained, trained and aware staff
- Adequate, efficient and compliant infrastructures with applicable legislation
- Identification and resolution of non-conformities
- Identification and application of necessary and effective Corrective Actions
- Systematic checks and periodic audits
- Periodic review of the performances achieved and identification of possible improvements.

8.1.1 ELIMINATING HAZARDS AND REDUCING RISKS

To eliminate the dangers and reduce the safety risks on the site and in the work activities, the Employer considers the hierarchy of applicable and accessible prevention and protection measures, considering in order the possibility of:

1. Eliminate sources of danger
2. Replace processes, activities, equipment and materials with less hazardous conditions
3. Adopt technical design measures (eg: isolation / confinement of danger, install shelters, aspirations, parapets, robots) and / or work reorganization (eg: avoid solitary work, working hours and harmful workloads, prevent harassment)
4. Adopt administrative measures such as training for new hires, job changes or updates, subcontractor management, health surveillance, instructions and work procedures
5. Provide PPE

The order of the measures taken is defined in the DVR and in the work procedures.

8.1.2 MANAGEMENT OF CHANGE

For all the need for changes, temporary or permanent, that must be made in OCS, the effects that may emerge and impact on the safety conditions in the workplace and on the performance of the IMS are evaluated, such as:

- Introduction of new products, processes, plants or changes to existing products, processes and plants
- changes in legal requirements and other requirements
- changes in personnel, knowledge and skills
- changes in practices, procedures and information relating to hazards and risks

The evidence of the assessment of dangers and risks in the face of the changes indicated above is reported in the "Dashboard Risk - Context" and "Dashboard Risk - Interested parties" and may lead to an update of the DVR.

8.2 REQUIREMENTS FOR PRODUCTS

By law, we reserve the ownership of this document, with the prohibition to reproduce it or make it known to third parties without written authorization.

The characteristics of the equipment and processes that OCS is able to perform are defined on the website www.OCS.it.

8.2.1 CUSTOMER COMMUNICATION

Communications, managed by Marketing and / or by the Sales Manager, mainly concern:

- Requests for inclusion in the Client's Vendor Lists
- Transmission of references, Job brochures, qualifications and certifications
- Management of requests, orders, contracts and technical changes
- Information to Customers and return from Customers regarding complaints and / or appreciations
- The management of the Client's intellectual property

Complaints regarding the quality of the products are forwarded to the Project Manager for the management of the problem, as defined in Section 10 of this Manual.

The Project Manager also manages feedback on customer satisfaction.

8.2.2 DETERMINING THE REQUIREMENTS FOR PRODUCTS

The characteristics and requirements of the products requested are transmitted by the Customer and are defined in the data sheet and drawings, with the reference technical standards, dimensions, diameters and dimensions supplied by the same.

The Customer's request may contain safety and / or environmental requirements (e.g. type of paints to be used, noise emission level of engines, ATEX requirements, ADPE, etc.)

The Customer's request is identified by the Sales Manager with an offer No., in a directory of the company server, where all the contractual, administrative and technical documents of the order will be stored.

If the Customer provides only basic data on the required equipment, the Sales Manager contacts him to acquire further technical information (eg: use of the equipment, required performance, applicable standards, etc ...) necessary for a rough sizing and processing of the This offer must also consider the nature, use and life cycle of the proposed equipment, the applicable legal requirements and the warranty terms.

In preparing the offer, the Sales Manager also considers the costs attributable to the necessary materials and surface treatments, logistics, transport, tests and inspections, delivery times.

If the Sales Manager has all the elements, he will process and send the offer to the Customer.

Otherwise, it can request the involvement of the General Manager and / or the Production Planning Manager (feasibility and timing) and / or the Project Manager or external consultants for the technical part.

8.2.3 REVIEW OF THE REQUIREMENTS FOR PRODUCTS

The estimate accepted by the Customer or his order are checked by the Sales Manager to identify any contractual and / or technical changes made by the Customer.

If the Customer has made significant changes, he is contacted for clarification of the case and the General Manager, for contractual aspects, and / or the Production Planning Manager (feasibility and timing) and / or the Project Manager for technical aspects are involved.

If the Customer's order is approved, the acceptance of the order is communicated to the Customer by the Administration, together with the list of persons / functions involved with whom the Customer can interface for various needs.

The Order, managed by the Project Manager, is planned with the involvement of the Technical Office and the Production Office.

8.2.4 CHANGES TO REQUIREMENTS FOR PRODUCTS

Any changes to the order, which emerged during the production phase, may arise from needs:

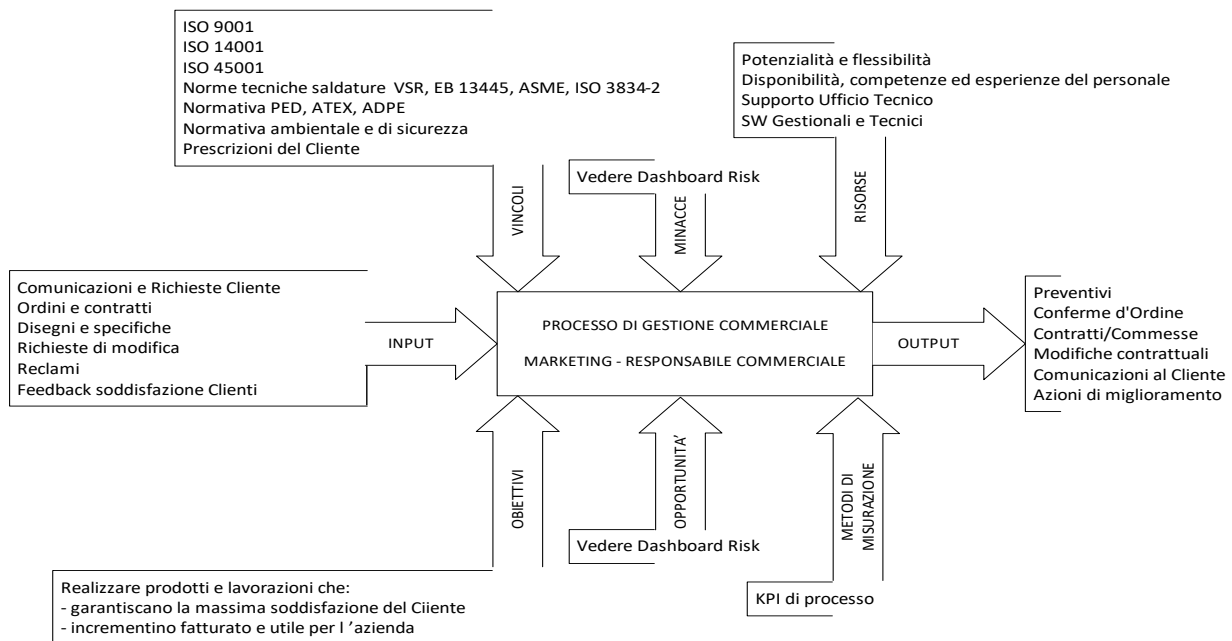
- Internal which may have an impact on delivery dates
- Of the Customer, advanced in process or in the testing and testing phase of the equipment

In the case of changes necessary for the needs of OCS, the Customer is immediately informed to avoid misunderstandings and disputes.

If the changes are requested by the Customer, the Project Manager evaluates whether they are significant and if necessary to issue a new offer which will become an integral part of the Order.

In any case, whenever there is a need to make changes to the requirements of the approved Order, OCS ensures that the related documented information is updated and that the personnel involved are made aware of the changes to be made.

8.2.5 COMMERCIAL PROCESS FLOW CHART



8.3 DESIGN AND DEVELOPMENT OF PRODUCTS

The process is managed by Technical Department (TEC) for each order for the realization of:

- Pressure vessels
- Columns
- Towers
- Reactors
- Shell and tube exchangers

of which the Customer does not provide or only partially provides project requirements and / or data with respect to the required equipment.

8.3.1 DESIGN AND DEVELOPMENT PLANNING

The Order/Job, managed by the Project Manager, is planned with the Project Engineering which is entrusted with the development of the project.

The Project Plan, with the individual development phases and the control points of the project, is defined in the "**Fabrication Plan**" of the Order in which the % of progress of each phase of the project, procurement and manufacture of the equipment are defined.

The "Fabrication Plan" also takes into account the Customer's contractual requirements relating to shipment and delivery date of the equipment and is approved by the Project Manager.

During the planning phase, it is established whether one or more phases of the project must be outsourced, such as the sizing calculations which must also take into account internal and external stresses that the equipment will have to sustain.

Project Engineering can make use of the skills of QHSE with regard to any design choices that may have significant repercussions on health and safety and / or environmental aspects within the plant.

All project outputs are defined in the "**Document List**" updated by Project Engineering.

8.3.2 DESIGN AND DEVELOPMENT INPUTS

The project inputs contained in the Order/Job include all the documents sent by the Customer such as data sheets, requirements for the materials to be used, drawings, calculations, references to international codes (e.g. ASME Section IX, EN 15609, EN 15614, ISO 3834), technical standards, directives and applicable laws (eg: ATEX, PED). Among the design inputs, the results of similar projects or parts of projects already validated can also be considered as design choices.

The completeness of the inputs is verified by Project Engineering which interfaces with the Customer for any technical aspects of the project.

8.3.3 DESIGN AND DEVELOPMENT CONTROLS

Project checks are planned and carried out at the end of the critical phases of the project which for OCS are foreseen:

- On preliminary drawings, calculations and specifications before sending to the Customer for approval
 - On the final project approved by the Customer, before the manufacturing phase
 - On the final validation of the project at the final outcome of the tests before shipment
- For the calculations carried out by external designers, the validation evidence of the software used is requested by OCS.

Evidence on the results of the project checks is reported in the "Fabrication Plan" as % of control progress and "Document List" as "Code Review" based on the Customer's approval feedback.

The in-process and final test and testing reports of the Customer, Third Parties, Notified Bodies, Authorized Bodies also contribute as evidence of controls and results of the same, to validate the project.

The functions that participate to controls are Project Manager, for the general aspects of the Order, and the Project Engineering for the technical aspects.

8.3.4 DESIGN AND DEVELOPMENT OUTPUTS

All the project outputs are defined in the "Document List" in which there can be references to:

- Material list
- Dimensional calculations
- Particulars (ex: nozzles, connections, etc)
- Specifications of welding, heat treatment, painting
- Inspection plans and destructive and/or non-destructive tests, hardness, hydraulic tests

Each document is encoded and sent to the Client, using the "Document Transmittal" form, for approval before being a definitive part of the project.

Among the project outputs there are all the "as-built" documents of the project and reports of the tests performed.

Quality Control (QC) manages the technical file to be sent to the customer with drawings, use and maintenance manuals, declarations of conformity.

8.3.5 DESIGN AND DEVELOPMENT CHANGES

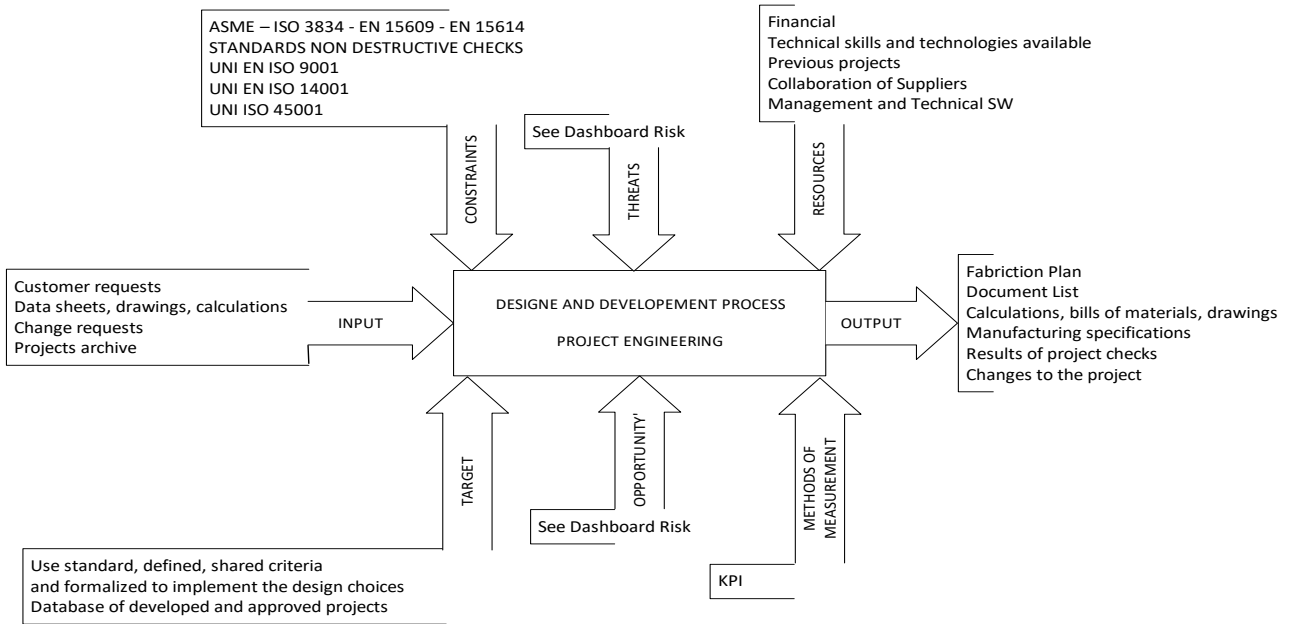
Any need for changes to the current project may arise from:

- Customer requests;
- Internal needs of OCS

The changes requested by the Customer during the design phase may refer to changes in the documents or design choices of OCS and are subject to revision of the documents concerned by Project Engineering which are recorded in the "Document List".

The other changes requested by the Customer during the manufacturing phase, if deemed feasible by the Project Manager, are considered in the manufacturing documents and will be part of the final documentation delivered to the Customer.

8.3.6 DESIGN AND DEVELOPMENT PROCESS FLOW CHART



8.4 CONTROL OF EXTERNALLY PROVIDED PROCESSES, PRODUCTS AND SERVICES

To ensure that the materials and services purchased comply with the requirements specified for procurement, OCS performs a prior selection of its suppliers by means of differentiated assessments based on the type of goods and services provided.

To ensure compliance of purchases, in an objective way, OCS proceeds to:

- Preventive assessment and qualification of Suppliers;
- Review of the Order / Contract;
- Control of the goods and / or services provided
- Monitoring of Supplier performance over time.

OCS may also extend to its Suppliers technical and qualitative prescriptions adopted internally and / or prescribed by applicable Standards, Laws and Regulations, as well as all information describing the materials / services to be purchased and the approval requirements relating to equipment, processes and procedures. used by the Contractor.

During the negotiation phase, a written commitment is required from the Supplier to carry out the tasks assigned according to the prescriptions of OCS and/or according to mandatory provisions.

The requirements vary according to the importance of the products / services requested, with particular reference also to the provisions relating to the environment and safety, for which the procedures "Waste management" and "Management of tenders, work contracts can be used. and administration".

Supply Chain / Purchasing has the task of identifying on the market the Suppliers with whom to prepare technical-economic supply agreements.

For the procurement process, OCS carries out assessments on threats and opportunities related to the context and to the stakeholders, the evidence of which assessment of possible scenarios is reported in the "Dashboard Risk - Context" and "Dashboard Risk - Interested parties".

8.4.1 QUALIFICATION, EVALUATION AND MONITORING OF SUPPLIERS

OCS has identified the requirements that Suppliers must meet in order to be included in the Qualified Suppliers List. The assessment/qualification, for inclusion in the OCS Qualified Suppliers List is carried out by Supply Chain / Purchasing in collaboration with other competent functions according to the following scheme:

FUNCTION	VALUED PRODUCT / SERVICE PROVIDERS	ASPECTS RELATED TO
----------	------------------------------------	--------------------

<p>Purchasing + Quality Control</p>	<p>Carpentry (saddles, skirts, stairs, walkways, beams) Semi-finished products (convex bottoms, calendered ferrules, forgings, sheets, pipes, profiles) Welding consumables (technical gases, electrodes, wire, rods) Consumables (flanges, fittings, bolts, gaskets, packaging) Subcontractors for welding, sandblasting and painting Transport, rentals, fuel, consultancy Instrumentation and the need for instrument calibration Destructive and non-destructive tests (radiographs, TOFD / PA)</p>	<p>Quality</p>
<p>Purchasing + Health, Safety & Environment (QHSE)</p>	<p>Sampling and instrumental investigations (atmospheric emissions, water discharges, waste characterization, noise pollution, workplace noise) Transport and waste treatment Contractors for welding, heat and surface treatments</p>	<p>Quality + H&S Environment</p>
<p>Purchasing + Plant Manager/Maintenance + Health, Safety & Environment (QHSE)</p>	<p>Plant infrastructure maintainers (machines and work equipment, heating and air conditioning systems, purification systems, overhead cranes, welding machines, ovens, fire-fighting equipment, PPE)</p>	<p>Quality + H&S Environment</p>

For the assessment of the quality aspects of procurement, the performance of the Supplier is considered with respect to requirements considered critical by OCS such as:

- Value for money
- Terms of payment
- Delivery / intervention times
- Consistency in the quality provided
- Consistency of supply
- Ability to solve problems and find solutions

For the evaluation and "environmental" qualification, OCS verifies whether the Suppliers are in possession of specific authorizations for the transport and / or treatment of waste or the technical and mandatory requirements provided for by the service provided by the plant engineers (eg: certifications and licenses Fgas, ADR, instrumentation, etc ..).

For the evaluation and "safety" qualification of Suppliers who perform interventions in OCS, the "Management of contract, work and administration contracts" procedure is used to verify the technical-professional requirements.

For new Suppliers, the assessment and qualification require at least 3 test supplies.

Audits can be carried out at the Supplier to verify that it is able to guarantee the supply chain, through the resources, skills and infrastructures available, authorizations, certifications, etc

The number of qualified OCS suppliers can be found in the "List of Qualified Suppliers"

8.4.2 TYPE AND EXTENT OF CONTROL

The products delivered to OCS are checked by the Warehouse Keeper (MAG) according to the indications of the "Tabella controlli accettazione" displayed in the reception and unloading area.

If the outcome is positive, the DDT is signed for acceptance and otherwise the Supplier is contacted for clarification of the case and resolution of the problem.

In this case, the materials can be rejected or segregated, but appropriately identified by the "Non-Conformity Report", informing the Supplier about the non-conformities found, awaiting decisions on the matter.

With regard to installation, assistance and maintenance services carried out by Suppliers at OCS, the Maintenance Technician verifies that the Supplier complies with the instructions received and has performed the service by carrying

out any legal or regulatory requirements and by providing the required evidence (eg: certificates and qualifications, declarations of conformity, test reports, completed reports and booklets, etc).

OCS may also require Suppliers (eg: subcontractors for out-site processing) to perform, where applicable, tests on the materials / products purchased and to provide the results of such tests.

In case of Non-Conformities found on a service/processing performed on vehicle/equipment, the "isolates" Maintenance Technician, if possible the same, identifying it as "Non-conforming" and communicating within OCS the object of the non-conformity and the provisions to follow.

Non-Conformities to Suppliers are managed by Purchases in collaboration with QHSE and / or Maintenance Technician.

8.4.3 INFORMATION FOR EXTERNAL PROVIDERS

Purchases in OCS are managed by the Purchasing Department and concern:

- Semi-finished products such as sheets, forgings, tubes in:
 - Carbon steel (eg SA 516 GR 70, SA 302 GR B)
 - Low alloy steel (eg SA 387 GR 11 CL 2, SA 387 GR 22 CL 2)
 - Stainless steel (eg SA 240 TP 304 L, SA 240 TP 316 L, SA 240 TP 321)
- Accessories and consumables (valves, gaskets, tie rods, welding material, etc)
- Chemical products (oils, phosphodegreasers, detergents, solvents, paints)
- Machines, plants, equipment, measuring instruments, HD and SW, communication systems
- Welding processes
- Packaging, transport and rentals
- PPE
- Fuels
- Thermal and / surface painting treatments
- Destructive and non-destructive tests (radiographs, TOFD / PA)
- Investigations instrumental for the environment and / or safety
- Consultancy, work performed by temporary agencies
- Maintenance and cleaning
- Waste management

The inputs for procurement derive from:

- "List of materials" sent by the Technical Office for the management of the individual Orders
- Requests from the competent Functions for waste management services, maintenance, monitoring, consultancy
- Advantageous fluctuations or disturbances in market prices
- Production schedules or specific production requests
- Inventory level in the warehouse

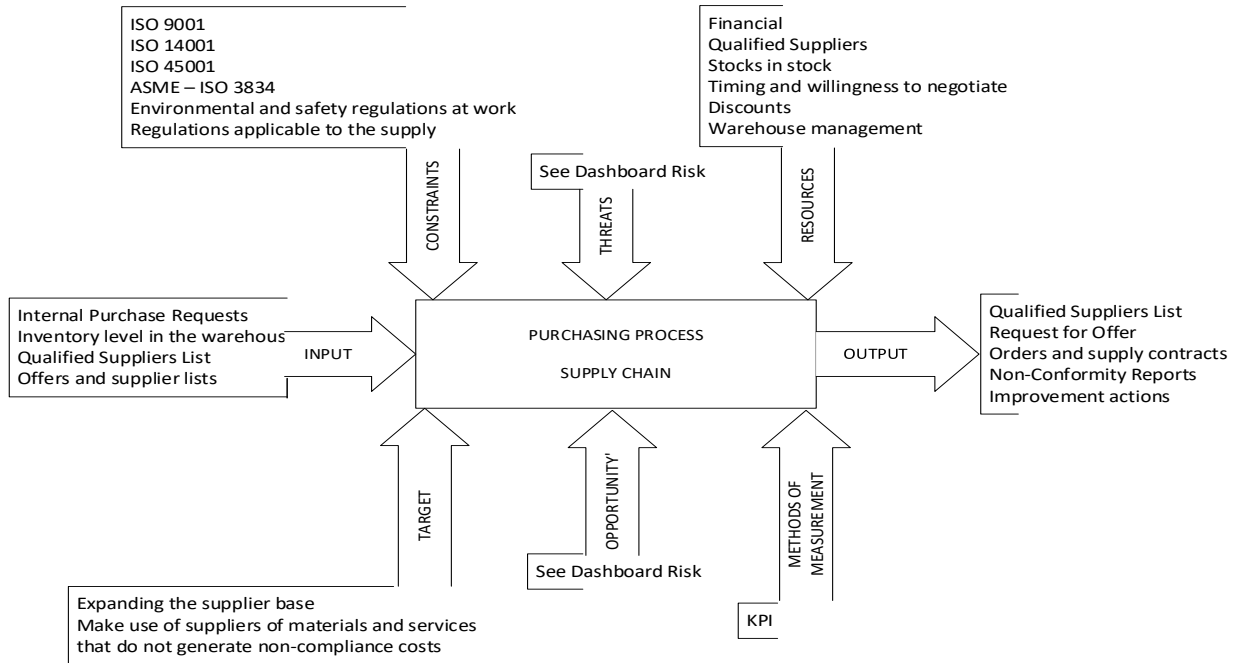
Office Purchases requests a quote or directly issues an order to the identified Supplier indicating the essential parameters of the supply such as:

- Description / code, specifications of the material / product (e.g. thicknesses, diameters, sizes, type of steel, hardness of the material)
- Reference legislation
- Quantity and size
- Requested delivery date
- Packaging
- Documentation accompanying the supply (Safety Data Sheet, Test Report, Declarations of conformity authorizations, etc.)

- Payment methods proposed

In the case of purchases involving services, the subject of the requested service is specified, the date of the intervention and the request for preventive documentation (DURC, DUVRI, calibration certificates, qualifications, etc.

8.4.4 PROCUREMENT PROCESS FLOW CHART



8.5 PRODUCTION AND SERVICE PROVISION

The management and control of the processes for the construction of the equipment required by the Customer is pursued through:

- Planning and scheduling of orders and planned activities
- Written procedures establishing the sequences and modes of operation, resources, controls and acceptable values of the process parameters
- Records of controls of production activities
- Use of selected and qualified suppliers
- Systems, equipment and tools that are adequate and subject to appropriate maintenance and calibration
- Managers and qualified, trained and trained operators
- Prior approval of special processes with monitoring of the parameters that affect the product and final validation

In particular, the last two requirements apply when the results of the processes are not readily verifiable through inspections and tests or if the shortcomings of the process may emerge a posteriori or during use (special welding and painting processes).

For the control of production activities, for example, the procedures / operating instructions / specifications defined by OCS and shared and approved by the Customer are used for:

- WPS / WPQR
- Thermal and surface treatments
- Destructive (DT) and non-destructive (NDT) tests, in-process and final tests and inspections (ITP)
- Hydraulic tests

For environmental control and safety at work, procedures are available, for example for:

- Waste management
- Chemical products management
- Use of PPE
- Use of forklifts

The complete list of documents (procedures and / or operating instructions) for the control of production, the environment and safety at work is shown in the "List of SGI documents".

The management and planning of each order is entrusted to the Project Manager who, in collaboration with the Sales Manager and Project Engineering, verifies the completeness of the input data and elaborates the "Fabrication Plan" with the individual work phases envisaged and transmits it to the Production Planning Manager, together with the "Job order management form" which recalls all the documents necessary for the management of the order.

During the Job, the Project Manager updates the "Fabrication Plan" with the % of progress / completion of the phases, with the feedback of the Production Planning Manager and monitors compliance with the deadlines, the % of progress of the phases and of the Job and any approvals of the Customer "HOLD POINTS" provided for in the "Fabrication Plan".

8.5.1 PRESSURE EQUIPMENT MANUFACTURING

Depending on the Job Order and the Fabrication Plan, the drawings and the "**List of Materials**", the Production Planning Manager in collaboration with Workshop Foreman and Welding Manager draws up the daily work program, assigning each operator the phase of competence with respect to the assigned Job Code.

8.5.1.1 CUTTING, CRIMPING AND CALENDERING

For the preparation of the sheets for virolatura, the Production Planning Manager in collaboration with Workshop Foreman develops the dimensioning of the development of the ferrules with the approved drawings. For the preparation of the sheets necessary for the order, Technical Office inserts the data necessary for the development of the "Cutting Nesting" into the SW "CAD/CAM", reducing the production of scraps as much as possible.

The "Cutting Nesting" contains information on:

- Cut sheet code, which allows the Supplier and the batch / cast to be traced

- The type of sheet metal, dimensions, thickness and weight
- The weight of the scrap
- The cutting time
- Order identification code

The Operator prepares the sheets that require "Cutting Nesting" from the PLC of the laser machine and starts cutting. The sheets are cut and/or perforated according to the cutting programs and the cut material is "released" to separate the cut pieces from the scrap of the sheet.

The cut and/or perforated pieces are caulked by the Carpenters according to the indications of the drawing, the thickness of the sheets and the welding techniques that will be used.

Depending on the size, each piece is identified at the Order No./Code and sent to calendaring for the formation of the shell according to the indications of the "Shell cutting" module and of the drawing issued by UT.

In this phase, the visual and dimensional checks are entrusted to the Carpenter who performs them in "self-control" mode with respect to the design delivered.

The checks carried out are highlighted on the construction drawing with initials, hoops and/or ticks and/or notes of the parts prepared and checked in order to make clear the construction and test progress.

In the event of problems, the Production and QC Manager is notified for the solution of the case and the possible issue and management of the Non-Conformity.

8.5.1.2 ASSEMBLY OF THE EQUIPMENT

The assembly consists in connecting the saddles, bottoms, plates and shells / plating that make up the equipment to each other, by means of the welding processes and the indications given in the construction drawing.

The welding process can be internal or outsourced, even on-site.

The use of internal and / or external welders and welding equipment is always approved by the Project Manager (Welding Coordinator) who first checks:

- Welding procedures (WPS) performed in OCS
- The qualifications of the welding processes (WPQR) available in OCS ("**List of Qualified Welding Procedures**") with respect to the Customer's specifications
- The qualifications of the welders in charge and their stamps (**Exhibit 11 A Welders List and Welders Continuity**)
- The calibration of the welding equipment used
- The availability of the welding material required by the WPS / WQPR

The Project Manager in collaboration with the Welding Coordinator verifies the presence in OCS of WPS, WPQR and the availability of welders qualified for these techniques and, in case of absence or need for renewal, contacts the third party to manage the needs of the case.

Additional tests may be required from outsourced welders to demonstrate actual capabilities by performing a pre-established production test that will be prepared, reviewed and approved by the Project Manager and Welding Coordinator.

"Test beads" can be performed in advance to verify the quality of the welded joints, as required by construction standards and / or by testing bodies (eg: VSR; EB 13445, ASME, ISO 3834), through destructive tests (DT) and / or non-destructive tests (NDT) performed by OCS and / or by external laboratories qualified by OCS.

Project Manager keeps all the documentation related to the management of the welding process.

In this phase, the welders visually and dimensionally check in self-control, highlighting the assembled, welded and checked components with ticks and / or hoops and / or notes in order to make clear the construction and test progress.

All welds will be stamped with the number or initials of the qualified welder who followed the weld.

After welding, QC checks are carried out to verify the alignment status of the equipment and NDT checks, according to the control plan approved by the Customer, such as for example penetrating liquids (PT), magnetic powders (MT), X-ray checks Rx-Ry, ultrasounds (UT) which are certified by a certificate.

In the event of problems, to Production Planning Manager and QC Manager is notified for the solution of the case and the possible issue and management of the Non-Conformity.

The certificates of the tests performed on the assays and welds are included in the final test dossier.

8.5.1.3 TRACKING, DRILLING AND POSITIONING

I carpentieri tracciano sull'apparecchiatura assiemata, le posizioni e le quote per eseguire i fori dove andranno saldati selle, bocchelli, flange, valvole, attacchi interni ed esterni.

La tracciatura è eseguita secondo le indicazioni e le tolleranze del disegno costruttivo loro assegnato dal Responsabile Produzione ed è controllata da CQ che riporta sulla copia del disegno costruttivo evidenze e note a testimonianza della conformità della tracciatura.

Se la tracciatura è completa e conforme i saldatori provvedono all'apertura di squarci e fori e al successivo posizionamento e saldatura del componente previsto dal disegno.

La saldatura dei componenti viene sempre eseguita secondo i criteri del precedente punto 8.5.1.2 e i controlli sono eseguiti in autocontrollo dai saldatori e da CQ e sono evidenziati sul disegno costruttivo a disposizione dei saldatori.

L'ultima fase consiste nell'allestimento dell'apparecchiatura/impianto con installazione di selle, bocchelli, flange, valvole, attacchi interni ed esterni.

8.5.1.4 HEAT TREATMENT

They are managed internally or assigned to qualified external suppliers, included in the Qualified Suppliers List.

The process aims to eliminate stress points on the equipment made through an induction system (Joule effect) obtained by heating and cooling the equipment in the oven.

The data that the Technical Office to be taken into consideration to define the specific treatment procedure for the equipment are:

- Type of heat treatment
- Applicable international standards (Ex: ASME, EN, BS)
- Specification of the type of material used
- Customer Specifications
- Temperature range
- Heating and cooling times
- Temperature maintenance times

The results relating to the heat treatment performed on the equipment are reported on the "**Heat Treatment**" (QUAS 009).

Hardness tests (HB, HR, HV) are performed by companies that perform non-destructive tests that issue a control certificate.

8.5.1.5 SANDBLASTING AND PAINTING

The surface treatments of sandblasting and painting are entrusted to contractors included in the List of Qualified Suppliers, which can be performed at OCS or at the Supplier to which all the necessary specifications are provided, which are defined in detail in the specific manufacturing procedure of the equipment.

For sandblasting, according to the applicable international standards (e.g. ASME, EN) or the Customer's specifications, the following is communicated to the Supplier:

- Degree of roughness in microns required
- Material to be used for treatment

The checks, as better defined in Section 9 of the MSGI, are carried out by external companies and are recorded in specific test certificates.

Similarly, for painting, the Supplier is informed of:

- The paint type
- The RAL
- The required dry thickness

The checks, as better defined in Section 9 of the MSGI, are carried out by external companies and are recorded in specific test certificates.

8.5.2 VALIDATION OF SPECIAL PROCESSES

OCS production process includes the internal phases of welding, heat treatments, sandblasting and painting which are among those processes that must be validated.

These are processes whose results cannot be fully ascertained through subsequent checks, tests and tests on the product and the shortcomings of the process itself may emerge during the use of the product.

The welding processes, carried out by OCS welders or by contractors, are validated by the available WPS and WPQR, by the qualifications of the welders and by the calibrated equipment.

Project Manager in collaboration with Welding Coordinator manages any need for validation of new welding and / or renewal processes or for recourse to new subcontractors with specific qualifications.

Further details for the welding process are given in the previous paragraph 8.5.1.2

As regards the heat treatments, the process is managed through the preventive control of the Suppliers, the calibration of the temperature probes and the maintenance to which the furnaces are subjected, while the validation of the process, as specified in the previous point 8.5.1.4, each equipment has a specific heat treatment procedure, therefore the validation of the process is carried out in the final balance according to the HB hardness results obtained.

The sandblasting and painting process is also validated in the final balance, depending on the checks on the final thickness, the visual appearance and the degree of adhesion of the paint, given that each equipment has a specific procedure defined by reference standards or by the customer.

The results of the validation are recorded and traceable at CQ.

8.5.3 IDENTIFICATION AND TRACEABILITY

Identification must ensure the possibility of recognizing and correlating the products with the related design, production and management documents, during processing and during the stop in the warehouse area, to avoid inappropriate mixing and possible use of non-compliant products.

The identification of the products inside OCS takes place with the use of:

- order number assigned by the Purchasing Department
- Ddt in which the order number assigned by the Purchasing Department and the Order No. are recorded

The identification of the product extends both to the material stored in the warehouse and to the material being processed through the affixing on the product of appropriate labeling (for the material in the warehouse) or through the writing of the order code directly on the semi-finished assembled.

Non-compliant materials, in particular, carry the term "HOLD" written on the product itself and are managed as Non-Compliant products.

Traceability must ensure the possibility of reconstructing the management history of the products through the combination of the equipment, which is identified by the Order No., with the related documentation.

The traceability of design / development and construction data (drawings, technical specifications, documented quality information, etc.) is ensured by the reference to the order code, which contains all the necessary technical / management information, and by the reference to the following documents (paper and computerized):

- Contract /customer order
- Graphical drawings and calculations
- Material list
- Fabrication Plan
- Sheet cutting shells
- Cutting map
- Inspection Test Plant
- Test reports
- Test certificates
- Material identification sketch
- DDT

8.5.4 PROPERTIES BELONGING TO CUSTOMERS OR SUPPLIERS

In OCS, half-finished products, finished products, software elements, drawings, specifications, know-how, patents and technical instructions are considered the property of the Customer.

In the management of the Client's property, all the provisions regarding the confidentiality of data and information, the Privacy Law and professional secrecy are respected.

The properties of Suppliers can be represented by hired equipment for the execution of specific works.

8.5.5 PRESERVATION

Logistics activities concerning goods, materials and products in OCS include conservation, identification, handling, packaging, transport and are managed by the Logistics Manager with the support of the MAG.

Storage

Goods, materials and products are stored in OCS in dedicated areas, according to their characteristics, dimensions, dimensions, storage specifications, criticality and place of use.

Materials subject to deterioration are stored away from atmospheric agents.

Each area is further differentiated according to convenience criteria, placing the most frequently used items in the most easily accessible locations.

There are segregation areas for non-compliant parts, goods or products and service areas such as parking and loading / unloading areas.

The positioning of the items on shelves or pallets takes place according to order and safety criteria, avoiding waste of space and the creation of unstable and useless piles.

To avoid possible contamination, the "Exotic Material Segregation" instruction is used.

Identification

With regard to identification, please refer to the previous paragraph 8.5.4.

Handling

Equipment and vehicles are used for handling. Depending on the material to be handled, forklifts, bridge cranes and cranes can be used.

Packaging, shipping and delivery

The packaging of the equipment to be delivered to the Customer is carried out on the basis of the specifications issued by TEC or COMM and by the Customer, with the use of material that guarantees the maintenance of the characteristics of the product and protects it from damage (pallets and film, use of wooden support structures, etc ...).

All packaging clearly and easily reads the identification of the content.

At the time of shipment to the Customer, the presence of any packing lists and the correctness of the transport note that identifies the materials, goods and items sent and the references for delivery are checked.

Loading operations are conducted and managed directly by the Logistics Manager.

OCS is responsible, as required by the contractual terms, for the correct conservation of the product during all stages of transport, if it uses external couriers, for delivery to the location designated by the Client.

The Customer must check the conformity of the product that is delivered to him at the time of unloading from the vehicle used.

8.5.6 POST-DELIVERY ACTIVITY

Contractually, there is a guarantee on the product supplied, as provided for in relation to the liability of the Manufacturer, where a duration of 2/3 years is established and where an amount of compensation is established for the damages received by the Customer following product inefficiencies.

8.5.7 CHANGE CONTROL

In OCS, changes to production programs can be generated by:

- Saturation of production capacity
- Need to perform external work
- Unavailability of semi-finished products in stock
- Design and / or production errors

- Customer needs occurred after the definition of the contractual conditions

If these events lead to delays in the delivery dates agreed with the Customer, partialization of deliveries or the need for new economic agreements, the Project Manager is activated for the necessary contacts with the Customer.

8.6 RELEASE OF PRODUCTS

OCS guarantees that the final delivery of the equipment takes place only after all the checks planned and provided for by the "**Exhibit 07 Inspection test plan**":

- have been carried out successfully
- the approvals of the competent control bodies and / or the Customer are present

The filled-in "Exhibit 07 Inspection test plan" provides evidence of compliance of the results with the acceptance criteria and of the person / function authorizing the delivery to the Customer

OCS provides the customer with construction drawings with the list of components, certificates of chemical and mechanical analysis of the materials used, certificates of the materials of the parts under pressure, certificates of tests and inspections performed, declaration of conformity CE/PED/ATEX.

All the documentation is included in a Technical Book that is delivered to the Customer together with the equipment.

8.7 CONTROL OF NON-COMPLIANT PRODUCTS

Non-compliant products / components coming out of a phase of the production cycle are identified and isolated, pending the appropriate decisions by QC in collaboration with the competent functions, which they establish based on the nature of the criticality detected and the its effect on the conformity of the finished equipment if the products / components:

- They are not recoverable, they must be eliminated, identified and deposited in the waste area
- They are recoverable, after the necessary rework

These criteria also apply to equipment found to be non-compliant after delivery.

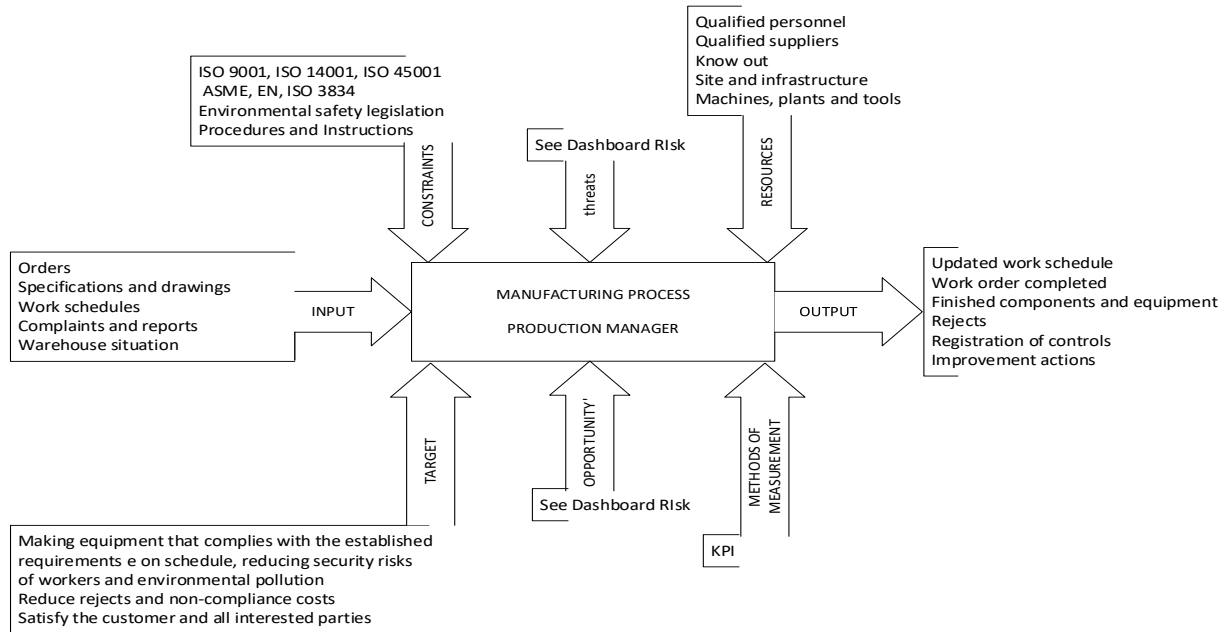
OCS manages the critical issues found on the products / components in the "Exhibit 10 Non-Conformity Report" using one of the following options:

- Correction
- Segregation / suspension of supply
- Obtaining authorization for acceptance by granting / waiving from the Customer

When non-conforming products are corrected, they are always subjected to a new cycle of checks and the relative findings are reported in the "**Exhibit 10 Non-Conformity Report**" to demonstrate their compliance with the requirements.

The non-conformity management process and any corrective action can be found in the "**Non-Conformity Register**".

8.7.1 PRODUCT MANUFACTURING PROCESS FLOW CHART



8.8 INJURY AND NEAR MISSES MANAGEMENT

During work activities, situations can occur that can be traced back to an accident / injury, or a work-related event during which an illness, an injury (regardless of severity) or a fatal accident occurred.

For the management of accidents, proceed as defined in the "Accident management" procedure using the "Accident / accident report" form.

In the event of an accident/injury, the personnel present must notify the First Aid Officers for the relevant interventions provided for in the Emergency Plan.

Once the emergency has returned, and after the injured person has been adequately assisted by medical staff, the RSP, in collaboration with the competent Functions and the Workers' Safety Representative (RLS), initiates an investigation aimed at identifying the causes of the event in order to define the most appropriate interventions to prevent its recurrence, through the necessary corrective actions.

RSP, in collaboration with RLS, will supervise the correct procedure described above and will assess the need to initiate further specific preventive actions in relation to the nature and severity of the injury.

If necessary, the RSP updates the Risk Assessment Document.

Near misses are considered as critical situations or non-conformities and are managed in the "Non-Conformity Register".

The Human Resources Department will, within 48 hours of receiving the references of the medical certificate, communicate electronically to INAIL the accident, of the employee or similar, which involves the absence from work of at least one (1) day excluding that of 'event'.

In the event that the accident involves an absence from work of more than three (3) days, the obligation to report the accident remains in accordance with art. 53 of Presidential Decree n° 1124/1965 amended by Legislative Decree, n° 151/2015.

Human Resources Department will send the medical certificate to the Labor Consultant for the administrative formalities of the case.

8.9 EMERGENCY PREPAREDNESS AND RESPONSE

Following the drafting of the Risk Assessment Document (DVR), the possible danger scenarios and possible emergency situations deriving from the activities carried out in the OCS workplaces were identified.

The Employer or his delegate, in collaboration with RSP other competent Functions, has prepared an "Emergency and evacuation plan" as a tool to prevent and respond to unexpected accidents or preventable random events,

By law, we reserve the ownership of this document, with the prohibition to reproduce it or make it known to third parties without written authorization.

considering all the risks for safety and environment that may occur in such situations and also any visitors and contractors present on the site.

The "Emergency and evacuation plan" foresees and manages situations related to:

- Human errors;
- Unforeseen breakdowns and accidents during normal work activities;
- External events due to particular natural events or human activities;
- Events that have already occurred on the site or in other similar situations even if they have not had negative consequences for the environment;
- Any other reasonably foreseeable situation.

The "Emergency and evacuation plan" is available in the areas of the site where the occurrence of emergency situations is reasonably foreseeable.

The "Emergency and evacuation plan" defines:

- Responsibility, human resources and means to manage the intervention;
- Internal communication methods;
- Actions to be taken depending on the extent and / or severity of the event;
- External communication methods with the Bodies and Authorities in charge, where required.

The "Emergency and evacuation plan" is the subject of staff training and training also with practical simulation exercises in the field.

The "Emergency and evacuation plan" is subject to review by the Employer or his / her delegate after each exercise and/or accident that has occurred or which has also been heard in other situations in order to verify the adequacy and effectiveness of the planned intervention plans, of the preparation of the personnel and of the means of struggle available.

SECTION INDEX

9.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION

9.1.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION OF PROCESSES

9.1.2 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION OF PRODUCTS

9.1.2.1 RECEIVING CHECKS

9.1.2.2 PROCESS CHECKS

9.1.2.3 FINAL CHECKS

9.1.3 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION OF THE ENVIRONMENT AND SAFETY

9.2 CUSTOMER SATISFACTION

9.3 ANALYSIS AND EVALUATION

9.4 CONFORMITY ASSESSMENT

9.5 INTERNAL AUDIT

9.6 MANAGEMENT REVIEW

9.6.1 MANAGEMENT REVIEW INPUT

9.6.2 MANAGEMENT REVIEW OUTPUT

MATRIX OF SECTION_9 REVISION				
REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01				
02				
03				
04				
05				

9.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION

In OCS, monitoring, measurement, analysis and evaluation are performed:

- About processes
- On products made
- On environment and safety
- On IMS

9.1.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION OF PROCESSES

For the Management, Core and Support processes, the performance indicators and the related objectives / targets are defined by the Management, when planning for business improvement.

The indicators and the status of achievement of the individual objectives and targets are verified during periodic reviews, so that their monitoring generates further opportunities for improvement, and at the same time any shortcomings and / or deviations that prevented their achievement are eliminated.

When a process does not comply with the established requirements and the results are not achieved with respect to the planned goals, QHSE requests the causes and reasons from the Process Manager.

QHSE analyzes these causes and evaluates the opportunity to take corrective actions to ensure compliance with the objectives and the achievement of the goals decided.

The proposed improvement actions are subject to Management Review, where any economic, human and technical resources are made available so that the decided and expected improvement is achieved.

9.1.2 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION OF PRODUCTS

The controls are planned to be carried out at the points of the process where the characteristics to be assessed are accessible for the measures to be carried out in the phases of:

- Acceptance - Receipt of goods (products, materials, equipment and vehicles)
- In process- Before and during the making of products
- Final - Before delivery to the Customer

9.1.2.1 RECEIVING CHECKS

The materials delivered to OCS are checked by the Warehouse Officer (MAG) according to the indications of the "Tabella controlli accettazione" displayed in the reception and unloading area.

If the outcome is positive, the DDT is signed for acceptance and otherwise the Supplier is contacted for clarification of the case and resolution of the problem.

In this case, the materials can be rejected or segregated, but appropriately identified by the "Non-Conformity Report", informing the Supplier about the non-conformities found, awaiting decisions on the matter.

For on-site installation, assistance and maintenance services, OCS requests that the Supplier complies with the instructions received and has performed the service by carrying out any legal or regulatory requirements and by providing the required evidence (e.g. certificates and qualifications, declarations compliance, test reports, completed reports and booklets, etc ...).

OCS may also require Suppliers (eg for out-site processing) to perform, where applicable, tests on the materials / products purchased and to provide the results of such tests.

In the event of Non-Conformities found on a service / processing performed on vehicles / equipment, the Warehouse Operator or HSE "isolates" it, if possible, identifying it as "Non-compliant" and communicating the object of the non-compliance within OCS and the provisions to be followed.

Non-Conformities to Suppliers are managed by Purchases in collaboration with QHSE and/or other functions.

9.1.2.2 PROCESS CHECKS

For production activities control, procedures/operating instructions/specifications defined by OCS are used, shared and approved by the Customer for:

- WPS / WPQR
- Thermal and surface treatments
- Destructive (DT) and non-destructive (NDT) tests, in-process and final tests and inspections (ITP)
- Hydraulic tests

The complete list of documents (procedures and / or operating instructions) for the control of production, the environment and safety at work is shown in the "List of SGI documents".

During the Job, the Project Manager updates the "Fabrication Plan" with the% of progress / completion of the phases, with the feedback of the Production Manager and monitors compliance with the deadlines, the% of progress of the phases and of the Job and any approvals of the Customer "HOLD POINTS" provided for in the "Fabrication Plan".

Further indications on the checks to be carried out for each Order are defined in the "Exhibit 07 Inspection Test Plan" and in paragraphs 8.5.1.1 → 8.5.1.5 of section 8 of the MSGI.

9.1.2.3 FINAL CHECKS

OCS guarantees that the final delivery of the equipment takes place only after all the checks planned and provided for in the "Exhibit 07 Inspection Test Plan":

- have been carried out successfully
- approvals of the competent control bodies and / or the Customer are present

The completed "Exhibit 07 Inspection Test Plan" provides evidence of compliance of the results with the acceptance criteria and of the person / function authorizing the delivery to the Customer

OCS provides the customer with construction drawings with the list of components, certificates of chemical and mechanical analysis of the materials used, certificates of the materials of the parts under pressure, certificates of tests and inspections performed, declaration of conformity CE / PED / ATEX.

All the documentation is included in a Technical Book that is delivered to the Customer together with the equipment.

9.1.3 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION OF THE ENVIRONMENT AND SAFETY

Planning the monitoring and measurement activities, the significant environmental aspects and impacts identified in the Initial Environmental Analysis and the dangers and safety risks identified in the Risk Assessment Document are taken into account.

The checks are entrusted to the Supervisors / Heads of Departments who compile the "Check list of environmental safety checks" and transmit the results to the Production Manager for checks and any decisions to be made.

The records of the results of the checks are used to verify:

- The level of use of the established prevention and protection measures and their effectiveness
- The degree of environmental prevention and protection exercised and the effectiveness of these activities
- The level of compliance with the mandatory safety and environmental requirements
- The level of compliance with the objectives of the IMS

For the monitoring of the environment and safety, the performance indicators decided during the review and the mandatory obligations required by the Laws, Standards, Authorizations and the applicable voluntary regulations that are monitored by QHSE are also considered.

The results of the monitoring recordings are subject to re-examination to undertake improvement programs and actions in relation to safety and / or the environment.

9.2 CUSTOMER SATISFACTION

The Sales Manager has the task of collecting data and information on the degree of customer satisfaction through:

- Communications and feedback from the Customer
- Customer complaints and reports

During the Management review phase, all the data collected are evaluated in order to identify the reasons that led to the dissatisfaction of the Customer and intervene with improvement actions.

9.3 ANALYSIS AND EVALUATION

The analysis and evaluation of data is one of the OCS Support processes that is applied to process all the information from which it is possible to obtain elements and make preventive decisions such as to avoid the occurrence of unacceptable situations and identify elements for improvement of the IMS .

The "Management review" is the document with which QHSE presents to the Management the data regarding:

- Effectiveness of the Integrated Management System adopted
- Continued adequacy and / or need to update the risk / opportunity assessment
- Compliance with mandatory laws and regulations and all voluntary regulations
- Economic trends
- Skills and staff training
- Adequacy and efficiency of vehicles, equipment and tools
- Satisfaction of the customer and other interested parties
- Costs incurred for the resolution of non-conformities and complaints
- Compliance with the initial requirements of the services provided
- Supplier performance
- Indicators of effectiveness of individual processes
- Safety and environmental indicators
- Monitoring, measurement and analysis of the data collected in the period and the improvement actions deemed possible
- Corrective actions managed during the period, analysis and improvement actions deemed possible
- Improvement actions carried out on the basis of previous improvement plans, analyzes and suggestions for any implementations still necessary
- Audits carried out during the period, analyzes and improvement actions deemed possible
- Results obtained with respect to the Company Policy and its adequacy
- Results obtained compared to previous programs, objectives and targets set

In this process statistical techniques or other methods are used that allow the results to be processed in histograms or other explanatory forms.

As for the data, to identify improvement elements for the environment and safety, each QHSE also uses information from:

- Surveillance and measurement results for safety and the environment
- Adequacy of the individual and collective protection devices adopted
- Status of security risks previously judged to be insignificant or acceptable
- Status of the environmental impacts previously judged as not significant
- Continued adequacy and / or need to update the Risk Assessment Document
- Continued adequacy and / or need to update the Impact Aspects Assessment
- Results of management reviews
- Reporting of interested parties

Further inputs to the review consist of some of the safety topics discussed at the meeting Art. 35 of Legislative Decree 81/08 and subsequent amendments. performed in each plant such as:

- The results of health surveillance
- Trend of accidents and near misses
- Staff training and education programs
- Adequacy of the PPE adopted
- Any technological investments and / or for safety at work and / or for the environment

The results are presented by QHSE on the occasion of management reviews to demonstrate the company performance achieved, potential problems, improvement proposals and other elements with which the Management is able to draw up the "Improvement Program Plan".

9.4 CONFORMITY ASSESSMENT

During the annual internal audits on IMS, the auditor in charge also performs a check aimed at ensuring compliance with environmental and safety requirements and verifying the applicability of all applicable laws, rules and regulations in OCS.

This verification is carried out using specific "legislative check lists" in which evidence is given, with respect to all applicable laws, rules and regulations, of the state and effective application.

The results regarding the verification of compliance with the requirements are indicated in the audit reports.

During the internal audits, the auditor checks whether these requirements are in progress and / or whether they have already been complied with in compliance with the established deadlines.

Otherwise, a Non-Conformity is opened, immediately activating the Function responsible for compliance in order to comply with the prescribed deadlines.

9.5 INTERNAL AUDIT

QHSE at least annually, plans and schedules audits:

- for the quality, on every process and company service according to the active construction sites, the complexity and criticality of the same
- for the environment according to the level of significance of the aspect / impact
- for safety according to the levels of risk in work activities

Additional criteria for planning audits may be the level of awareness and qualification of the personnel involved, organizational changes, new hires, changes in duties, detected non-conformities, environmental incidents, the results of previous audits, etc ...

QHSE draws up a:

- Quality audit plan and program
- Environmental audit plan and program
- Safety audit plan and program

The audit plans and programs are approved by the Management.

Internal audits are entrusted to internal or external staff in order to guarantee:

- Independence of evaluation
- Auditor training or qualification
- Impartiality and objectivity of the verification

Internal audits are performed using specific "Checklists" on which evidence is recorded regarding the implementation and compliance of the part of the IMS applicable to the Function / Area verified.

The results of the audits are reported in the "Audit Report" in terms of non-conformities found and / or recommendations for improvement.

The results are communicated to the verified Process Manager and to QHSE.

The Managers must take the necessary actions without delay to resolve any non-conformities found.

It is the responsibility of the auditor in charge to ascertain and document the implementation of the Corrective Actions agreed with the Managers subject to verification and their effectiveness.

All documentation relating to the audit management process is stored in the records and is used for data analysis and subsequent management review.

9.6 MANAGEMENT REVIEW

The Management carries out periodic reviews of IMS which consist in verifying its continuous suitability, adequacy and effectiveness in relation to the quality of services, safety in the workplace, and pollution prevention.

Ordinary reviews take place at least annually, while extraordinary reviews can be carried out at the moments deemed most appropriate by the Management, such as on the occasion of new and significant decisions and / or company situations, new processes / services, etc ...

As part of the reviews, the Management and QHSE, with the collaboration of the other departments concerned, assess the need for changes and the opportunities for continuous improvement:

By law, we reserve the ownership of this document, with the prohibition to reproduce it or make it known to third parties without written authorization.

- The effectiveness of the prescriptive and registration system of the IMS
- Legislative, regulatory and regulatory compliance
- The company objectives and goals established
- The adequacy of the performance indicators used
- The surveillance and monitoring tools adopted
- The reliability and adequacy of the policy adopted
- The adequacy and effectiveness of the resources made available

9.6.1 MANAGEMENT REVIEW INPUT

Among the elements of evaluation, through analysis of the data systematically collected by QHSE, there are:

- Internal audit reports and / or performed by the SB and / or by the Certification Body
- Results of audits performed on Suppliers
- Data and results regarding the mandatory and voluntary legislative, regulatory and regulatory compliance of OCS
- Results and trends of the checks performed for quality, safety and the environment
- Return data from the Customer, satisfaction, reports, expected complaints and requests from interested parties
- Trend in annual turnover
- Accidents, near misses, Non-Conformity situations, emergency situations and accidents, even potential ones, detected in the period
- Examination of complaints and reports from interested parties
- Examination of the effectiveness of the corrective and improvement actions undertaken
- Objectives and goals achieved compared to previous improvement programs
- Data deriving from technological progress, legislative changes, changes in products and activities
- Observations for improvement that emerged during the audit

All the data collected by QHSE are processed by topic, in the form of histograms, data collection sheets, reports, etc. and brought to the attention of the Management through the document "Management Review" to communicate the results achieved and any needs and proposals for improvement.

9.6.2 MANAGEMENT REVIEW OUTPUT

The input data processed by QHSE and presented to the Management make it possible to establish action plans that take into consideration the need for:

- Define new policies, indicators, objectives, targets and programs
- Re-formulate already defined objectives / goals for which there is no evidence of ability to obtain, or if necessary replace them with others more relevant to the changing directions of the Company or coming from outside
- Improvement of services in relation to customer reports, competition performance, mandatory regulations, safety risks, related environmental aspects
- Eliminate or reduce occupational safety risks
- Eliminate or reduce the environmental pollution generated
- Adapt the resources used according to the new needs

The results of these decisions are formalized in the "Improvement Program Plan" approved by the Management and disclosed by QHSE to the Managers concerned for the pursuit of the new objectives and goals.

SECTION INDEX

10.1 GENERAL

10.2 INCIDENTS, NON-CONFORMITIES, COMPLAINTS AND CORRECTIVE ACTIONS

10.3 CONTINUOUS IMPROVEMENT

MATRIX OF SECTION_10 REVISION

REVISION	DATE	DESCRIPTION / CHANGE TYPE	WRITTEN BY QHSE	APPROVED BY GD
00	03.09.2021	1 st document issue with definition of IMS		
01				
02				
03				
04				
05				

10.1 GENERAL

In OCS, IMS makes it possible to identify, through monitoring activities but also using the results of the various risk assessments that are carried out (on processes, on the environment and on safety), opportunities and actions capable of:

- Eliminate the causes of potential Non-Conformities, safety risks, environmental impacts, emergencies, accidents and complaints in order to prevent their occurrence
- Improve the products manufactured to systematically satisfy the customer's requirements and to increase their satisfaction
- Improve the performance of IMS

The improvement opportunities are assessed and decided during the management review and are included in the improvement plan.

10.2 INCIDENTS, NON-CONFORMITIES, COMPLAINTS AND CORRECTIVE ACTIONS

In OCS, situations of Non-Conformity are managed, for example due to:

- Process and product non-conformities
- Near misses
- Non-conforming materials, products, vehicles and equipment
- Unforeseen events and emergency situations
- Human errors and / or non-compliance or violation of behavioral rules by workers
- Default of Suppliers
- Failure to comply with the provisions of the IMS
- Non-compliance with the requirements and / or limits of the Law and / or Authorizations
- Non-compliance with regulations and agreements signed voluntarily
- Non-compliance with the Client's requirements

For all situations, in which criticality, validity, danger and deviation from the legal limits and / or the required requirements are actually ascertained, the related "Non-Conformity Reports" must be completed to record the event.

The non-conformity management process and any corrective action can be found in the "Non-Conformity/Corrective & Preventive Actions Register".

The criticalities found on the products / components are formalized in **EXHIBIT 10 - Non-Conformity Report**.

Products, situations (e.g. near misses) and events that are truly Non-Compliant or that can lead to critical situations for the environment and safety must be reported by all Operators to their Manager, who must provide for management and resolution.

In the case of an emergency situation that can lead to dangerous situations for people and / or the environment, it is immediately resolved and subsequently, once the emergency is over, the person in charge records the event in the Non-Conformity Report.

In the event of serious emergency situations that have compromised or may compromise the environment and the surrounding community, OCS will immediately notify the competent Authorities and promptly intervene to bring the emergency back and prevent further damage and dangers by making the site safe.

The records of Non-Conformity events and situations are kept by RSI for subsequent evaluations.

Corrective Actions are managed in OCS to eliminate the causes of non-conformities, the causes of emergency situations and accidents and near misses that have occurred, the reasons for complaints in order to prevent their recurrence and are generally appropriate and commensurate with the effects of the non-conformities. Conformities found and their chronicity.

The analysis of the causes of Non-Conformity described in "Non-Conformity Reports" and in complaints is aimed at defining the corrective actions aimed at eliminating these causes.

In particular, they are aimed at obtaining positive results for OCS and for the interested parties, through the identification and implementation of the necessary actions and the periodic review of the effectiveness of what has been implemented.

The analysis of the causes of Non-Conformity described in the "Non-Conformity Reports" is aimed at defining the remedial action to be implemented by establishing adequate and appropriate resources to the nature and severity of the violation found. All the activities defined above are subject to registration and review for the verification of execution and effectiveness by QHSE and the Functions involved.

10.3 CONTINUOUS IMPROVEMENT

The measurement and monitoring activities and data analysis are not only aimed at verifying the compliance of the specified requirements, but also at identifying the critical points of OCS's activities and at introducing possible improvements.

The aim of the pursuit of continuous improvement of the entire Integrated Management System of OCS is to constantly increase the satisfaction of Customers and all other interested parties (Properties, Shareholders, Employees, Customers, Suppliers, Authorities, etc.) through:

- Identification of elements subject to improvement and reasons for improvement through specific facts and objective evidence
- Analysis of existing processes and their state of affairs
- Analysis of safety risks and their current status
- Analysis of environmental impacts and their state of affairs
- Identification of the roots / sources of the problem
- Identification of possible solutions to eliminate the roots / causes of the problem and prevent its reappearance
- The search for effects / results that confirm the elimination of the roots of the problem and that the goal has been achieved
- The involvement of the Suppliers for the purpose of a continuous improvement of the product made with respect to all the principles of company policies
- Efficient development, enhancement and use of available human resources together with the maximum willingness on the part of the company to meet the propensities and expectations of workers
- Continuous development of skills and promotion of the culture of safety and the environment through training and information activities aimed at both internal and external staff
- Continuous search for a good corporate climate, a high quality of the work environment (open, flexible and attentive to people's needs), enhancing the diversity of the subjects involved

For this purpose, indicators of effectiveness of the Management, Main and Support processes are defined so that the process can be monitored and measured to generate opportunities for continuous improvement for the whole of OCS in response to real and / or potential problems.

Similarly, safety and environmental indicators are identified with which to monitor performance and measure improvements, chronicity and / or the worsening of critical elements.

On the occasion of the annual Management Reviews, the periodic meeting is also carried out pursuant to Art. 35 of Legislative Decree 81/08, in which the participation of the Employer, RSPP, RLS, MC is expected to report any shortcomings regarding the safety and identify any possible improvement measure and the verification of the effectiveness of the applied methodologies

During the review phase, carried out according to Section_5 of the MSGI, during the planning for continuous improvement, the Management in collaboration with the competent Functions verify the results achieved in the period considered and define action plans for:

- Define new policies, indicators, objectives, targets and programs
- Re-formulate already defined objectives / goals of which there is no evidence of achievement, or if necessary replace them with others more relevant to the changing directions of the company or coming from outside
- Improvement of services, environmental impacts and safety risks
- Eliminate or reduce significant environmental impacts and occupational safety risks
- Adapt the resources used according to the new needs

The result of these decisions is formalized in the "Improvement Plan and Program", approved by the Management and disclosed to the Managers and the personnel concerned for the pursuit of the new objectives and targets of competence.

QHSE periodically checks the "Improvement Program Plan" in order to verify the status of achievement of the individual objectives and targets and implement appropriate Corrective Actions in the event of significant deviations from what was expected.