



Health, Safety and Environment Policy

September 2025

A. INTRODUCTION

At Axxam, we care for our people and the environment, ensuring sustainability in a responsible and proactive manner. We are committed to minimising our environmental impact and protecting the health and safety of employees, contractors, customers, and the community by conducting business responsibly.

B. PURPOSE & SCOPE OF THE POLICY

This Policy provides a framework that defines the principles guiding Axxam's commitment to meeting our health and safety obligations. The document, entitled Health, Safety and Environment, outlines the principles adopted to uphold these standards. This Policy applies to Axxam's direct operations across all functions and employees.

REFERENCES

This Policy is designed to reinforce the principles in our **Code of Ethics** as well as our internal **Standard Operating Procedures (SOPs)**, **Standard Safety Procedures (SSPs)** and the **Code of Conduct for Sustainable Procurement on top of our Governance Organizational Model** issued in line with D. Lgs 231/2001 (local requirements).

C. COMMITMENTS

Prevention

- **Identify and manage hazards:** Establish procedures for risk assessment and management to help reduce the likelihood of workplace accidents.
- **Risk assessment measures:** Conduct regular workplace risk assessments to promote the health and safety of employees and others, and to check that appropriate controls are in place.
- **Reduce accidents and injuries:** Aim to create a safer working environment through staff training and by using equipment and tools that align with recognised standards of safety and energy efficiency.
- **Adopt a responsible approach to the environment:** Seek to minimise the environmental impact of activities by introducing sustainable practices where possible.

Procedures

- **Equipment use:** Employees are encouraged to handle equipment responsibly and in line with established guidance. Any concerns, issues, or defects should be reported promptly.
- **Incidents and first aid:** First aid arrangements should be communicated in a clear and accessible way. Workplace accidents and injuries are expected to be reported and recorded to support ongoing health and safety practices.

- **Fire prevention and response:** Fire safety procedures should be maintained, with measures in place to promote a safe working environment. Employees are expected to be familiar with fire safety instructions and to act appropriately in the event of an alarm.
- **Workstation safety:** Workstation assessments can help support the health and wellbeing of employees who regularly use display screen equipment.

Employee engagement

- **Staff wellbeing:** Promote the physical and mental wellbeing of employees through supportive initiatives, open communication, and active listening.
- **Active participation:** Encourage participation and the reporting of health, safety, and environmental matters to help promote a collective and responsible approach to safety.

D. MONITORING AND REGULATORY COMPLIANCE

Fully integrated in the Governance Model, this Policy and the company's performance will be monitored and reviewed by the ESG Committee, alongside operational teams, ensuring alignment with internal standards (e.g. SOPs' and SSPs', ISO 9001, 27001, 45001 certifications) and relevant regulatory requirements.

E. TRAINING AND ADHERENCE TO THE POLICY

Axxam aims to provide employees with appropriate training relevant to specific roles and supervision to enable them to carry out their duties safely and competently. Employees will be required to read, understand, and adhere to all Standard Operating Procedures (SOPs') and Standard Safety Procedures (SSPs') that apply on top of the Governance Organizational Model principles.

F. GOVERNANCE & ACCOUNTABILITY

- **Oversight and approval:** Board of Directors
- **Monitoring and review:** ESG Committee
- **Implementation and adherence of the policy:** All employees