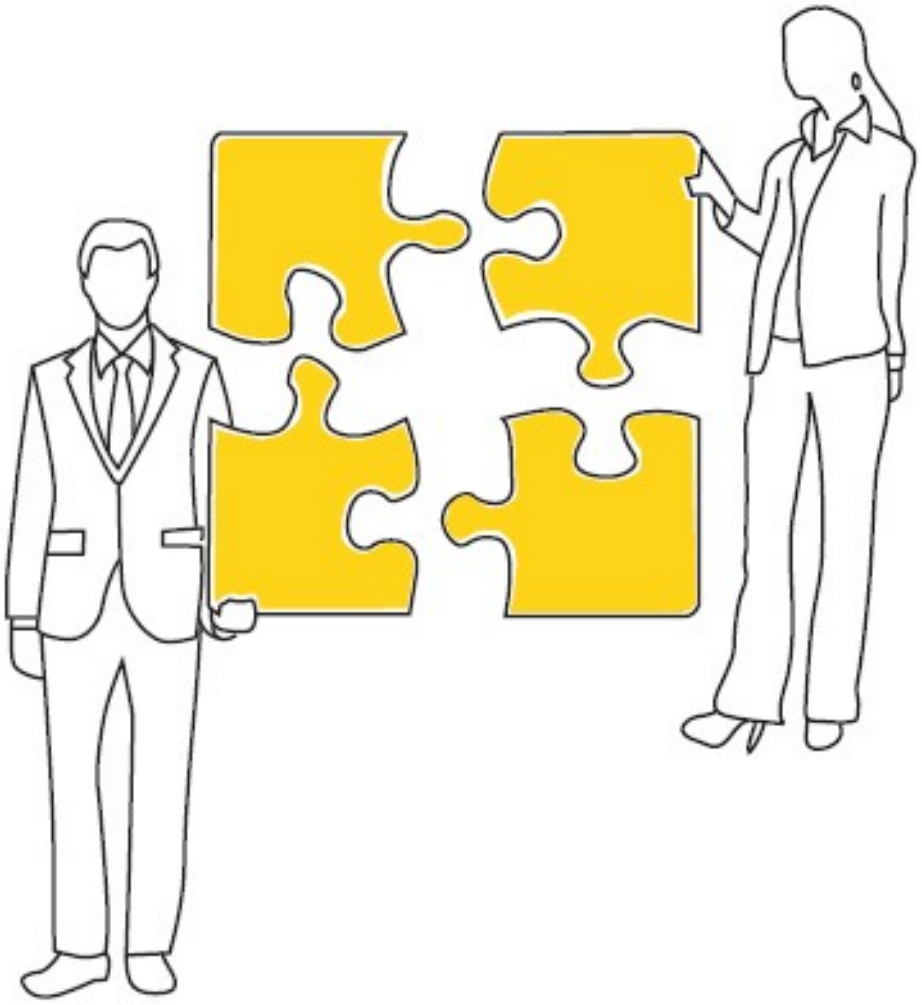
Procedure

Application of the HSE and SLT MSG

HSE/SLT Management System



Reference MSG: HSE and SLT

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TITLE PAGE

TITLE:

Application of the HSE and SLT MSG – HSE/SLT Management System

NOTES:

This document is available to all employees on an electronic medium and in a secure form.

This procedure cancels and replaces pro hse 009 versalis R06 “Principles and policies relating to health, safety and environment, public safety and sustainability”, pro hse 006 versalis r03 “HSE Management System”, pro hse 012 versalis R03 “Product Stewardship Management System” and subsect. 5.3 of opi hse 191 “Health planning, monitoring, reporting and review” to implement MSG HSE rev.04, MSG SLT rev.01, of Annex M of MSG HSE “Management Review”, opi slt 002 eni rev.01 “Management Review in the sphere of Health”, updating the corporate structure and HSE model of Versalis

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1. OBJECTIVES

The objective of this document is to provide the operational and methodological reference for the application of Eni's Management System Guidelines for HSE (MSG HSE) and Health (MSG SLT).

It defines the guiding principles, activities, roles and responsibilities regarding Safety, Health, Environment, Public Safety and Sustainability.

This is aligned with the roles, responsibilities and competencies assigned to company functions, procedures/operating instructions in Safety, Health, Environment and Public Safety and Sustainability, Versalis's Organisational Model 231, Eni's MSG HSE/SLT, Versalis's HSE model, Eni's Code of Ethics and international regulations and standards.

Versalis pursues the primary objective of ensuring the safety and health of employees, populations, contractors and customers, the protection of the environment, public safety and sustainability.

Sustainability is the commitment to develop responsible behaviour towards stakeholders that contributes to economic development, which, in using resources, meets the needs of present generations without compromising those of future generations, integrating respect for people, the environment and society as a whole into the business model.

Sustainability represents the driving force of a continuous and cross-cutting improvement process within the company that ensures the sustainability of results over time and strengthens the process of development and enhancement.

Versalis adheres to the Responsible Care® (RC) Programme by implementing an HSE management system that respects the principles and requirements of the RC programme, aiming for the sustainable development of business activities, according to values and behaviours oriented towards safety, health and the environment within the broader context of corporate Social Responsibility.

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2. SCOPE

This procedure applies to the activities of Versalis S.p.A. and serves as a reference for activities conducted abroad and for directly or indirectly controlled Companies, both in Italy and abroad, insofar as it does not conflict with the respective national regulations.

The scope of reference includes the HSE/SLT Management Systems implemented in each Employer Line/Controlled Company of Versalis, both in Italy and abroad.

3. REFERENCES

3.1 Internal references

- ENI Code of Ethics
- Model 231 of Versalis

Eni HSE policy

- MSG HSE and annexes implemented by

Versalis spa MSG SLT and annexes

implemented by Versalis spa

- Corporate procedure pro sn 001 “Regulatory Tools Management Procedure: procedures and operating instructions”
- Corporate procedure pro hr 007 “Training”
- Corporate procedure pro irs 001 “Social Accountability Management System”
- HSE Procedures and Operating Instructions issued by Versalis spa

any regulatory instrument that updates and/or integrates the above-stated references.

3.2 External references

- Legislative Decree No. 81/2008 as amended and supplemented, “Implementation of Art. 1 of Law No. 123 of 3 August 2007 governing the protection of health and safety in the workplace” (so-called Consolidated Act on Health and Safety at Work)
- Legislative Decree no. 106/2009 as amended and supplemented, “Supplementary and corrective provisions of Legislative Decree 9 April 2008, no. 81, regarding the protection of health and safety in the work place”
- Decree Law No. 137/2020, “Further urgent measures regarding health protection, support for workers and businesses, justice and safety, related to the Covid-19 epidemiological emergency”
- Legislative Decree No. 231/2001, “Regulations on the administrative liability of legal persons, companies and associations, whether or not without legal personality, pursuant to Article 11 of Law No. 300 of 29 September 2000”
- Legislative Decree no. 152/2006 as amended and supplemented, “Environmental regulations”
- Legislative Decree no. 105/2015 as amended and supplemented, “Implementation of Directive 2012/18/EU on controlling the danger of major incidents involving hazardous substances”

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- Regulation 1907/2006/EC REACH “Registration, Evaluation, Approval and Restriction of Chemicals” and subsequent updates
- Regulation 1272/2008/EC CLP “Classification, Packaging and Labelling of Substances and Mixtures” and subsequent updates
- Globally Harmonized System of Classification and Labelling of Chemicals - GHS (Rev.8) 2019 (internationally agreed-upon system for the classification and labelling of chemicals)
- Regulation (EU) 528/2012 - BPR concerning the placing on the market and use of biocides, used for the protection of humans, animals, materials, or articles against harmful organisms, such as pests and bacteria, through the action of active substances contained in the biocide
- UNI EN ISO 14001:2015 standard: Environmental management system
- UNI EN ISO 45001:2018 - Occupational Health and Safety Management System
- Regulation (EC) No. 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a community eco-management and audit scheme (EMAS III)
- Standard UNI 10616: “Process Plants at Risk of Major Accidents – Safety Management in Operation – Implementation Criteria”
- Standard UNI 10617: “Process Plants at Risk of Major Accidents – Safety Management in Operation – Essential Requirements”
- Standard UNI 689: “Guide to the assessment of inhalation exposure to chemical compounds for the purpose of comparison with limiting values and measurement strategy”

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4 DEFINITIONS, ABBREVIATIONS AND ACRONYMS

ASSETS: Natural resources and all tangible and intangible investments to exploit and process them (including crude hydrocarbon extraction plants, storage and import/export facilities, hydrocarbon refining facilities, conversion and treatment plants, power plants and environmental treatment facilities).

AUDIT: A systematic, independent and documented process aimed at obtaining evidence (records, statements of fact, or other verifiable information) and evaluating it objectively to determine the extent to which the audit criteria are met.

DEMING CYCLE (PDCA): An iterative management method used for the control and continuous improvement of processes and products in relation to the context in which the organisation operates. It is based on a logical sequence of four repeated steps:

- planning - Plan;
- implementation and operation - Do;
- checking and corrective actions - Check;
- management review - Act.

HSE COMMITTEES: organised structures present in operational units, vertically linked, designed to promote activities or initiatives in HSE and Health matters.

HSE ISSUES: situations, generally abnormal and unpredictable, that can pose an HSE risk, even if only potential, whose management is the responsibility of the employer but whose effects may exceed the scope of their line of responsibility, requiring the employer to receive integrated support from the competent company functions for resolution.

EMPLOYER (DL): Every natural person who holds employment relationships or is otherwise responsible for an Operating Unit; this person is identified as the "employer" as defined in Italian legislation (Legislative Decree No. 81/2008) and also in other figures/roles contemplated by the applicable Italian legislation in the sphere of HSE for the relevant Operating Unit, or in comparable figures contemplated by the relevant overseas legal system. As manager of the Operating Unit, he is responsible for assessing and mitigating all risks relating to health, safety and the environment, and public safety for the relevant Operating Unit; in carrying out this activity he uses subjects with the appropriate skills and powers, including expenditure, and appropriately identified and/or delegated by means of the appropriate regulatory/organizational tool in accordance with the legislation in force in the country where the company's activities are carried out. The positions are identified by the Board of Directors of Versalis. For the Subsidiary companies, this role is covered by the respective Managing Director/General Manager/CEO.

EMERGENCY: A situation whose undesired consequences may persist or worsen in the absence of remedial actions, potentially causing harm to people, the environment, assets and reputation.

HEALTH EMERGENCY: all those situations where a severe and sudden compromise of the health of one or more individuals requires prompt and effective medical intervention, and failure to act in a timely and appropriate manner may lead to serious adverse consequences.

SIGNIFICANT PRIVATE ENTITIES: companies, consortia, foundations, associations and other private entities, even without legal personality (including rating agencies), that perform professional/institutional or business activities from which Eni may derive a benefit or in which Eni may have an interest.

EPIDEMIC: the widespread occurrence of an infectious disease within a community at a specific time

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eSDS: Extended Safety Data Sheet (eSDS) consisting of the Safety Data Sheet supplemented by Exposure Scenarios that indicate the operational conditions to be observed and any risk management measures to be adopted.

EXPOSURE: a condition in which a worker comes into contact with risk agents present in the workplace; it relates to the intensity of the risk agent and the duration of contact with the risk agent itself.

OCCUPATIONAL EXPOSURE: a condition in which a worker comes into contact with risk factors present in the workplace for a certain length of time. Direct exposure occurs when the worker is exposed to a risk resulting from an activity they perform; indirect (bystander) exposure occurs when exposed to risk factors arising from work performed by other workers nearby. Acute exposure occurs over a short time or with high doses, resulting in acute effects; chronic exposure occurs over a long time, resulting in chronic effects.

HSE EVENT: refers to incidental events and hazardous conditions/actions.

INCIDENTAL EVENT: an event or chain of events (incidental sequence) that has caused or could have caused harm to people, company and/or third-party assets, the environment, with possible repercussions on the image of Eni S.p.A. and/or Versalis. This definition includes the following types of events:

- Accidents;
- Near misses.

SUPPLIER: an economic operator (individual, legal entity, or group of people) potentially able to meet a specific procurement need for goods, works and services. The need can also be met through the use of subcontractors.

Eni HSEQ FUNCTION: a structure for guidance, coordination and control on safety, health, environment and quality issues at Eni.

Eni Health FUNCTION: a structure for guidance, coordination and control on health issues at Eni.

Company QHSE UNIT: Versalis site organisational structure for guidance, coordination and specialist support to the Employer regarding safety, health, product safety, environment and public safety.

JUDGEMENT OF FITNESS FOR WORK: a document in which the Occupational Physician states the worker's fitness for a specific job.

HSE: acronym for Health, Safety, Environment.

ACCIDENT: an unexpected, random and violent event or chain of events (accident sequence) occurring during work activities, which has resulted in consequences for people, assets of the company and/or third parties, the environment, with possible reputational impacts for Eni S.p.A. and/or Versalis. This definition includes, for example, injurious events (events causing harm to people, excluding commuting accidents), fires, explosions, primary and secondary containment losses (spills, gas releases), road, maritime, rail and air accidents, events causing property damage, events with potential impacts on the company's image, etc.

KPI: Acronym for Key Performance Indicator: an index that monitors the performance of a particular activity within a company.

WORKER: a person who, regardless of the type of contract, performs work or work activities under the control of an employer's organisation, with or without remuneration, even for the sole purpose of learning a trade, art, or profession. This includes employees, external suppliers, contractors, self-employed workers, agency workers whose work or activities are controlled by the organisation, apprentices, interns and beneficiaries of training and orientation initiatives to create periods of alternation between study and work or to facilitate occupational choices through direct knowledge of the working world.

EMPLOYER LINE (LD): refers to a production unit/organisational structure or a set of one or more operational sites aimed at producing goods and/or services, as well as supporting organisational functions, related to an employer.

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MEDICAL EMERGENCY RESPONSE PLAN (MERP): a local plan,
specifically designed for the site in question, based on the health risk assessment of the country, location and type of work, as well as available medical resources, describing the response to various medical emergency situations and utilising available resources. The MERP is a functional part of the Emergency Response Plan (ERP). The plan also describes the procedure for organising the international medical evacuation of expatriate personnel or their subordinates.

MEDICAL SUPPORT STUDY AND PLAN (MSSP): a planning and health analysis document that identifies and formalises the internal medical assistance model within the LD.

CONTINUOUS IMPROVEMENT: a dynamic process of the management system aimed at achieving performance improvements and related indices.

MODEL 231: Model of organization, management and control implemented by Versalis pursuant to Legislative Decree No. 231/2001.

NON-CONFORMITY: failure to meet a requirement.

COMPLIANCE OBLIGATIONS: legal requirements that an organisation must meet and other requirements that an organisation must or has chosen to meet. This includes HSE-related agreements such as collective agreements, protocols, understandings with public authorities, etc., and international standards, laws, regulations and national policies of the countries in which operations are conducted, as well as specific business sector policies and operational procedures, particularly in the HSE field.

COMPLIANCE BODIES: In Italy, this refers to the Supervisory Board/ODV of Eni S.p.A. and the Supervisory Boards/ODV of controlled companies. Abroad, it refers to the Local Compliance Committees and the Compliance Supervisory Bodies.

ORGANISATION: a person or group of persons having their own functions with responsibility, authority and relationships to achieve their objectives.

OBSERVATION/RECOMMENDATION: an indication aimed at planning improvement actions to consolidate the level of assurance of compliance and to prevent potential future issues, even if the legal requirements for the topic are substantially met.

STAKEHOLDER: a person or organisation that can influence, be influenced by, or perceive itself as influenced by a decision or activity.

PANDEMIC: an epidemic occurring worldwide or over a very wide area, crossing international boundaries and usually affecting a large number of people.

PERFORMANCE: a measurable result of the Management System.

HAZARD: the intrinsic property of a substance or a physical situation to cause harm to human health, safety, or the environment.

POLICY: an organisation's orientations and directions formally expressed by its top management.

PRODUCT STEWARDSHIP (PRODUCT SAFETY): is a tool, widespread in major oil companies, for managing the HSE aspects of marketed and/or used products in a coordinated and efficient manner, defining the roles and responsibilities of all parties involved throughout the product life cycle: R&D, procurement, production, storage/packaging/labelling, sales, transport, use, recycling and waste reuse.

HEALTH PROTOCOL: a document defined by the Occupational Physician that, based on specific risks and considering the most advanced scientific guidelines, includes:

- the homogeneous group(s) for which health surveillance has been defined and the related exposed workers;
- the type(s) of health checks to be conducted (medical examination and any additional checks) and their frequency.

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RISK: the combination of the probability of a specific event occurring within a given period or under specific circumstances and the consequences that may result

MANAGEMENT SYSTEM (SG): a structured set of roles, responsibilities, methodologies, regulatory requirements, records and documentation, based on a logic of continuous improvement, that regulates and governs all aspects related to the scope of competence at a given organisational level.

ENVIRONMENTAL MANAGEMENT SYSTEM (ISO 14001): a management system or part of a management system used to manage environmental aspects, fulfil compliance obligations and address risks and opportunities.

HEALTH AND SAFETY MANAGEMENT SYSTEM (ISO 45001): a management system or part of a management system used to accomplish the policy for Occupational Health and Safety.

SAFETY DATA SHEET (SDS): the official document for communicating safe use of a chemical product (substance, mixture, chemical agent released from an article) throughout the supply chain, informing about hazards, chemical-physical, toxicological and eco-toxicological properties, and indicating appropriate storage, handling and safe disposal methods of the chemical agent. It should enable users to take all necessary measures to ensure the protection of human health and the environment, as well as workplace safety (in accordance with Regulation EC 1907/2006 of 18 December 2006 – REACH).

PROCESS SAFETY: A set of technical and organisational measures aimed at preventing, mitigating, preparing for and responding to incidental events affecting a process/plant that may result in an uncontrolled (potentially catastrophic) release of hazardous substances or energy.

SLT: acronym for Health.

SUBSIDIARY (SC): companies directly and/or indirectly controlled, solely, by Versalis, in Italy and abroad, listed in the "Subsidiaries" annex of the latest approved consolidated financial statements, as well as in the supplementary list of Italian companies controlled by law, pursuant to Article 2359, subsection 1, no. 1, and subsection 2, of the Italian Civil Code, by Versalis, prepared by the unit of the Corporate Affairs and Governance function responsible for the corporate governance of the subsidiaries, in consultation with the competent unit of the Administration and Budget function, as well as other competent functions identified with the support of the Organisation function, and made available to the functions concerned for the obligations provided for by applicable regulations. A subsidiary, whether Italian or foreign, may consist of one or more Employer Lines.

SVHC: acronym for Substance of Very High Concern, meaning substances that may have serious and often irreversible effects on human health and the environment (source: ECHA - European Chemicals Agency)

TECHNICAL AUDIT (TA): an Audit activity aimed at verifying the correct application and effectiveness of Versalis's HSE/SLT Management System, its adherence to the company's policy and objectives, its consistency with this procedure, its correct application and its alignment with Eni's organisational and management model, in accordance with the Code of Ethics and the Organisational Model 231 of Eni and Versalis.

COMPANY QHSE UNIT: Versalis's organisational structure for guidance, coordination, specialist support and control over site QHSE functions as well as Employers for QHSE and Health aspects.

OPERATIONAL UNIT: a set of one or more operational sites, with financial and technical-functional autonomy, aimed at producing goods and/or services, as well as supporting organisational functions, related to an Employer. Unless specified otherwise, in this procedure, Operational Unit should be understood as both Versalis's Operational Unit and the Operational Unit of a company, whether Italian or foreign, controlled by Versalis.

COMPLIANCE CHECK (VC): an activity aimed at verifying compliance with legal regulations and applicable reference standards in HSE matters of the Operational Unit.

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5. OPERATING PROCEDURES AND ACTIVITIES

5.1 The HSE/SLT process

The HSE/SLT process of Versalis is an integral part of Eni's operational model, serving as a fundamental element for value generation through the definition of cross-cutting methods and approaches aimed at:

- protecting workers;
- safeguarding assets;
- protecting the environment and public safety.

The HSE/SLT process is essential for carrying out all of Versalis's business activities, both in Italy and worldwide, due to:

- its importance in defining business strategy;
- the breadth and complexity (at both national and international levels) of the regulatory, technical and legislative framework;
- its strong cross-functionality and impact on all operational and management activities related to other processes.

In accordance with the MSG HSE and MSG SLT, Versalis's Employer Lines/Subsidiaries (LD/SC) are allocated within defined clusters defined:

- based on HSE risk and primary resource consumption. They manage HSE risk through the implementation of integrated HSE management systems, according to the criteria contained in Annex D "Clustering Criteria based on HSE risk". This clustering is communicated via email by the Employer, also through their QHSE unit, to the Company QHSE unit in case of new entry and/or change, along with the reasons for such allocation. The clusterings for the entire Versalis domain are reported twice a year in the respective reviews. They are also entered into the HSE Database according to the timelines and methods defined each time, also for reporting to the Supervisory Boards (OdV);
- based on the *Country Health Risk Classification and clustering of employer lines* conducted by Eni's Health function, aimed at supporting the Employer in defining priority action areas for achieving health-related objectives and the continuous improvement of performance, seeking elements capable of influencing the preservation of the state of health or response to the health needs of workers, their families and the populations of the reference country.

The Company QHSE unit is informed as needed of any changes in the consolidation domain and, in such cases, acts to ensure the clustering of new LD/SC, while the responsibility remains with the Employer.

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5.2 HSE/SLT Management System

To ensure that all activities, processes and services meet Eni's requirements, as well as mandatory and voluntary HSE and SLT standards, Versalis has implemented a Health, Safety and Environment Management System consistent with Eni's MSG HSE and MSG/SLT, tailored to the specificities of its organisation and responsibility structure.

The HSE/SLT process is structured according to the Deming cycle method to ensure continuous improvement of the planned activities. Specifically, the HSE/SLT process consists of five phases:

- ***planning***: this phase involves defining the company's position on HSE/SLT issues by identifying hazards and assessing HSE/SLT risks and opportunities, identifying and managing applicable compliance obligations, setting objectives and planning activities to achieve them;
- ***support for implementation***: this phase involves defining the set of, both tangible and intangible, means and resources necessary for implementing the HSE/SLT process, with particular reference to the implementation and operation of risk/impact/use management activities within the area of competence, especially training, information, instruction, awareness and expertise, managing internal and external communication and documented information;
- ***operational activities***: this phase involves implementing all the necessary activities to effectively eliminate/reduce HSE/SLT risks/impacts and improve HSE/SLT performance, based on the assessments conducted. This includes actions aimed at mitigating and managing risks/impacts on the environment and worker health and safety (e.g., emergency management, change management, waste management), managing risks related to HSE/SLT aspects impacting the organisation (e.g., reputational, legal, asset integrity risks) and pursuing identified improvement opportunities and objectives;
- ***performance evaluation***: this phase involves collecting data and information on performance, conducting control and verification activities on HSE/SLT processes through monitoring, audits and reviews;
- ***improvement***: this phase involves identifying opportunities for improvement, also through the analysis and management of HSE/SLT events, non-conformities and corrective actions, and taking necessary actions to achieve the expected HSE/SLT outcomes.

This procedure identifies and describes the sub-processes that make up each of the above phases, along with their characteristics, main operational methods and related roles and responsibilities.



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The HSE/SLT Management System is developed by the Company QHSE Unit Manager. It is approved by the CEO and serves as a technical-organisational reference for the activities conducted at Versalis S.p.A.'s Operational Units, as well as at its subsidiaries.

Each Operational Unit is responsible for its own HSE/SLT Management Systems, which are defined and implemented independently, in compliance with the policy and general guidelines set by this regulatory tool and the MSG HSE/SLT and Human Resources.

The Company QHSE Unit directs and coordinates the Operational Units in implementing the Company's HSE/SLT policies, ensuring constant monitoring for the purpose of updating and/or reviewing the HSE/SLT Management System and guaranteeing continuous adaptation of company procedures/operating instructions to the evolution of internal, national and international regulations and best practices.

In this context, it is specified that Versalis adheres to the Responsible Care® Programme by implementing its HSE/SLT management system, which respects the principles and requirements of the RC programme, aiming for the sustainable development of business activities, according to values and behaviours oriented towards safety, health, environment and public safety within the broader context of corporate Social Responsibility.

5.2.1 Organisational context

5.2.1.1 Understanding the organisation and its context

To understand the key issues that can positively or negatively influence the ability of the employer line to achieve the expected outcomes within its HSE/SLT Management System, and to guide efforts for implementation and continuous improvement, it is essential for each employer line to be fully aware of the complexity of the context in which it operates.

To achieve this objective:

- ***for HSE aspects***: the reference is the regulatory tool opi hse 026 eni "Context Analysis", which defines the criteria and methods for developing context analysis that, with reference to HSE aspects, considers: external factors (economic-financial, environmental, energy, regulatory, political, sociocultural, technological, market, etc.), internal factors, constraints and expectations of stakeholders considered important;
- ***for SLT aspects***: the reference is what is provided for in MSG SLT – subsect. 3.1, and in particular:
    - definition of country health risk - Eni's health function defines the level of health risk for each of the countries where Eni operates or intends to establish itself, that is to say the level of health risk based on indicators derived from international databases, indexed with the support of one or more IT tools. Eni's health function periodically evaluates the need to update the country health risk in light of any changes/updates to the sources used for its calculation or in the presence of exceptional events;
    - contextualization of the country health risk and formalisation of the Medical Support Study & Plan - the HSE unit of LD/SC analyses its reference context, with the aim of understanding the key factors on which the Employer defines the integrated HSE/Health Management System. The HSE unit of LD/SC is responsible for the following activities:
        - general framing of the host country, with reference to various topics including demographic, social, economic, climatic, epidemiological and general legislative health situations;
        - analysis and evaluation of the ongoing or planned Eni industrial project, also with reference to the workforce (internal and/or third-party) and, in general, the beneficiaries of the health management system;
        - analysis and evaluation of the country's healthcare service delivery system, with particular reference to the quality standard and access/payment methods to both public and private facilities present in general and in the reference area;
        - analysis and evaluation of health risk conditions not strictly related to specific risk or workplace environmental risk, but related to biological, chemical and physical environmental risks.

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This information is formalised within the MSSP Medical Support Study & Plan (hereinafter, MSSP) and related documents, prepared by the HSE unit of LD/SC and approved by the Employer. The MSSP also allows for the local contextualisation of the country health risk by focussing on the context in which the LD operates. This is particularly important for contexts where the health indicators used to define the country health risk are not uniformly distributed across the territory.

The MSSP is updated by the LD health function in the event of changes to the elements under analysis and, in any case, according to the frequency defined by the specific company regulatory tools based on the clustering of the LD.

The company QHSE unit collects the MSSP from its LD for analysis and planning activities within its competencies and forwards them to Eni's health function for potential reclassification of the country health risk.

Eni's health function shares the results of the country health risk analysis with RMI for the Integrated Country Risk and contributes to RMI's risk assessment process, as defined by the MSG “Integrated Risk Management”.

The LD/SC ensures the development of a context analysis in accordance with the guidance regulatory tool to identify the scope, factors and stakeholder issues most significant in potentially influencing the Management System's ability to achieve its objectives.

Specifically, the LD/SC determines:

a) the major stakeholders for the HSE/SLT management system;
b) the major needs and expectations (i.e., requirements) of these stakeholders;
c) which of these needs and expectations become its compliance obligations.

The adequacy of the context analysis is verified at least annually during the review, and the document is revised in the event of changes affecting the different types of context.

5.2.1.2 Understanding the needs and expectations of stakeholders

The process of developing the context analysis and the needs/expectations of stakeholders is conducted in collaboration with the internal and outsourced company functions concerned and is structured in the following phases:

- identification of external and internal context issues and identification of the important ones for the purposes of the HSE/SLT Management System;
- identification of stakeholders and determination of the important ones for the purposes of the HSE/SLT Management System;
- identification of needs/expectations/constraints of stakeholders, evaluation of the important ones and the definition of response methods and priority levels.

This analysis is conducted through:

- collection of information and data related to the context and stakeholders (via databases, press, institutional/agency reports, archives);
- interviews with management and company functions;
- focus groups, surveys, targeted consultations, conferences, seminars, field verifications, where necessary and appropriate.

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The analysis, which must be tailored to the LD/SC, aims to enable the organisation to gain a general understanding of the "important" issues arising from the context in which it operates and the major needs and expectations of stakeholders (internal and external), so that these can be considered within its HSE/SLT Management System.

For each identified reference context, the organisation identifies the stakeholders operating within it through a "mapping" process, identifying those who:

- affect the organisation's activities, products and services concerning its HSE/SLT performance;
- are affected by the organisation's HSE/SLT performance.

All Versalis HSE/SLT procedures and operating instructions that define the methodology and criteria for managing HSE/SLT risks are referenced to evaluate their importance for the HSE/SLT management system.

ll needs/expectations identified as "important" based on the evaluation conducted with the described criteria become "compliance obligations", or requirements to be met to ensure the consistency of the HSE/SLT Management System, and are considered in the planning and implementation phase of the SG itself.

The results of the context analysis must be appropriately considered, particularly in identifying risks/opportunities that may arise from the identified important issues.

At least annually, the LD/SC and the Company QHSE Unit for Product Safety aspects define, in response to the analysed risks, improvement plans with their respective implementation timelines, to enable monitoring through their review activities, following up until closure. This is done considering that the responsibility for implementation remains with the employer and, for Product Safety aspects, with the Company QHSE Unit.

5.2.2 Leadership and worker participation

5.2.2.1 Leadership and commitment

Leadership at Versalis is effected through continuous commitment by Management towards HSE and Health issues. The employer and all personnel with decision-making power in the sphere of HSE/SLT show leadership and commitment to HSE and Health issues through their daily actions and decisions, specifically by:

a) ensuring the effectiveness of the management system;
b) ensuring that the defined policy and objectives are compatible with the strategic directions and context of the organisation;
c) ensuring the integration of management system requirements into the organisation's business processes where applicable;
d) ensuring the availability of necessary resources for the HSE/SLT management system;
e) communicating the importance of effective HSE/SLT management and compliance with the management system requirements;
f) ensuring that the HSE/SLT management system achieves the expected outcomes where applicable;
g) leading and supporting people to contribute to the effectiveness of the HSE/SLT management system through their leadership;
h) promoting continuous improvement;
i) providing support to other management roles to demonstrate their leadership as it applies to their areas of responsibility;
j) developing, leading and promoting an organisational culture that supports the expected outcomes of the HSE/SLT management system;
k) valuing reports of incidents, hazards, risks and opportunities made by workers;
l) ensuring that the organisation establishes and implements a process or processes for worker consultation and participation;
m) communicating to all those who work on behalf of Versalis or are stakeholders in the business the importance of HSE/SLT issues in terms of correct and effective management;

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n) maintaining a strong sense of responsibility in the commitment to preventing occupational diseases, preventing injuries, protecting the psycho-physical well-being of workers and, more generally, maintaining, protecting and promoting the health and safety of workers;
o) ensuring that health objectives are established, that they are compatible with Eni's strategic directions, and that the regulatory system can achieve the expected results, in the perspective of continuous improvement;
p) ensuring respect for the health of communities.

At Versalis, across all its entities, there is a strong commitment to HSE/SLT issues by management, which extends to all organisational levels. This is evidenced by a series of activities regularly conducted: HSE/SLT committees, safety days, safety pacts, theatrical events, awareness and training interventions on developing leadership in HSE, etc.

Management at the various organisational levels values the achievement of positive HSE results that is to say the development of innovative initiatives in the field, also through specific recognition methods such as safety awards, highlighting best practices and the emergence of a significant number of near misses/unsafe conditions/unsafe acts in review activities, safety day and awards for a year without employee injuries.

5.2.2.2 Policy

The general guidelines and reference principles regarding HSE/SLT are defined in Eni's Policies,

which:
- are defined and formally approved by the Board of Directors;
- are endorsed by the CEO;
- serve as a reference for any specific HSE policies where necessary due to compliance obligations or certification requirements;
- are disseminated to workers and made available to all stakeholders.

As outlined below, with reference to the HSE/SLT management system and in alignment with Eni's Policy, Versalis formalises the guidelines and objectives on the subject of HSE/SLT that meet the required standards.

PRINCIPLES AND POLICIES RELATING TO HEALTH, SAFETY, ENVIRONMENT, PUBLIC SAFETY AND SUSTAINABILITY

In its activities, Versalis pursues the primary objective of ensuring continuous improvement in Safety, Health of employees, populations, contractors and customers, environmental protection, public safety and sustainability, operating with reference to the Code of Ethics and the following principles:

- industrial and commercial activities are managed in compliance with international agreements and standards, current legislation, specific company policies, operational procedures and guidelines, and the national regulations and policies of the countries in which it operates concerning the protection of workers' health and safety and the environment;
- the company adopts principles, standards and solutions that constitute international best practices for the protection of Safety, Health, Environment, Public Safety and Sustainability; to this end, it implements systematic benchmarking processes;
- operational management adheres to advanced criteria for environmental protection and energy efficiency and seeks to improve Health and Safety conditions according to content and methods shared with trade unions;
- the company manages health, safety, environmental protection, public safety and sustainability aspects through the implementation of an integrated management system, according to the principles of precaution, prevention, protection and continuous improvement, holding all organisational levels accountable;
- the company is strongly committed to promoting leadership, consultation and worker participation to ensure that health, safety and environmental aspects are managed in accordance with the guiding principles;
- the company designs, constructs, manages and decommissions its tangible assets, ensuring the protection of health and safety, with particular attention to process safety coordinated with asset integrity aspects, minimising environmental impacts and optimising the use of energy and natural resources;
- management is subject to constant verification through Regulatory Compliance Audits, Technical Audits,

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Process Safety Audits and, in general, system audits;

- research and technological innovation are aimed at promoting products and processes that are increasingly environmentally friendly and sustainable, with a growing focus on the Safety and Health of employees, communities, contractors and customers, also promoting partnerships for the development of new technologies;

the company considers the protection of health a fundamental requirement and promotes the physical and mental well-being of its people;

- staff training and the exchange of experiences and knowledge are regarded as essential tools for achieving the objectives of Safety, Health, Environment, public safety and sustainability, with a view to continuous improvement in prevention and protection;
- within their roles, employees participate in the process of safeguarding safety, health, environment, public safety and sustainability, as well as protecting themselves, their colleagues and the community;
- employees, trade unions, authorities and the public are periodically informed of the company's achievements in safety, health, environmental protection, public safety and sustainability;
- the company is committed to contributing its technological capabilities and professional expertise to the well-being and improvement of the quality of life in the communities where it operates and to the most effective implementation and continuous improvement of the sustainability model;
- where required, the company provides cooperation to the competent authorities in the development of technical standards and guidelines on Safety, Health, Environmental Protection, Public Safety and Sustainability;
- the company ensures that, as part of the review process, the principles outlined above are periodically revised with a view to continuous improvement to ensure that these principles are appropriate and adequate in relation to the aims and context of Versalis, considering the nature, size, impacts and risks of its activities, products and services;
- the policy on safety, health, environment, public safety and sustainability is adequately communicated to employees and stakeholders.

The stated principles form the framework for the objectives of Versalis's HSE/SLT management system.

5.2.2.3 Organisational roles, responsibilities and authorities

Versalis identifies its Chief Executive Officer as the Legal Representative responsible for compliance with European and non-European regulations regarding Product Safety.

The company is structured into Operational Units, each one, by a resolution of the Board of Directors and in line with the company's HSE/SLT management model, is represented by an Employer who corresponds to the Site Manager[1]. In the case of the San Donato Milanese headquarters, this role is held by the HR Business Partner Manager.

This individual has full functional and managerial autonomy and, where applicable, represents the company as the Employer (pursuant to Legislative Decree No. 81/2008 as amended and supplemented), Manager (pursuant to Legislative Decree No. 105/15), Head of the Enterprise (pursuant to Legislative Decree No. 40/00), “Owner” (pursuant to Legislative Decree No. 624/96), Purchaser (pursuant to Article 89 letter b of Legislative Decree No. 81/2008) and is therefore responsible for identifying, planning and implementing measures to ensure compliance with all current and future regulations, as well as all good practice rules in HSE/SLT matters and for taking all appropriate actions to prevent, impede and/or avoid any dangerous situations related to the activities that could compromise health, safety, the environment, public safety, or sustainability.

For the Subsidiaries, the Employers are the Managing Directors/General Managers/CEO (unless other managers are identified within them, also consistent with the complexity of the company and any applicable regulations in the countries where they carry on their business).

Considering the complexity of the risk and the organisational structure, and in line with the goal of continuous improvement, coordination figures are identified within individual organisational areas as the hierarchical reference for

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the relevant Employers and as an operational link to the Chief Executive Officer regarding any critical issues identified in health, safety, environment, public safety and sustainability and the solutions adopted.

These figures, defined as Coordinators of Employers, are identified as the Industrial Manager (for Employers of hierarchically dependent production sites) and the Biotech Manager (for the Employer of Crescentino and the Employer of the Novara and Rivalta Scrivia Research Centres). They coordinate the Employers, support them in identifying improvement objectives, promote strategic solutions to any significant issues that arise, provide appropriate support in identifying solutions and oversee their implementation.

The company's QHSE unit, within its area of competence, oversees the implementation of the company's safety, health, environment, public safety and sustainability policy and plays a guiding, coordinating and controlling role over the general management of HSE/SLT aspects, the Operational Units and the Headquarters. The company's QHSE Unit Manager sets improvement objectives in Health, Safety, Environment, Public Safety and Sustainability, taking into account Eni's general guidelines, following an analysis of the main HSE/SLT performance indicators related to the operational units and their impacts on the local context in which they operate.

Versalis implements the HSE/SLT guidance process through the specific actions of its corporate functions and with the support, where necessary, of Eni's structures.

The tools through which the company assigns roles and responsibilities are defined by the procedures of the regulatory system (pro sn 001 ve) and the organisational system (pro hr 003 ve), as outlined in Eni's "new Eni management and organization system" (NEMO'S) application. In accordance with Annex N to the MSG HSE, the minimum competency requirements for sensitive roles are defined.

Other tools for regulating technical and operational activities include manuals and technical documents.

In this context, the technical and operational activities carried out by the company's QHSE unit in the area of Product Safety are defined.

The Operational Units implement the HSE management process through the structures defined by their Employer, in accordance with the guidelines of the Versalis organisation and the MSG HSE/SLT.

In particular, the organisation adopted by the company for HSE/SLT purposes is structured based on the following general criteria:

- there is a clear separation between the functions of planning, organisation and control and the operational functions responsible for implementing the established principles and objectives;
- tools are implemented to ensure the adequacy and functionality of the defined and adopted organisational model over time;
- "Employers" are granted specific and additional "HSE powers" beyond those separately conferred for managing their respective industrial, commercial, or operational activities;
- in exercising the conferred powers, "Employers" have the autonomy to organise themselves without spending limits and may delegate responsibilities to positions they deem suitable within their structures;

1 For the 'Synthesis Labs, Pilot Plants & Common Infrastructures Novara and Rivalta Scrivia' units, this is the Head of R&D and Renewable Research Centres. For sites where the company conducts activities related to the 'Oilfield Chemicals' business, it is the Head of Specialty Oilfield Chemicals.

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- the traceability of the communication of responsibilities and conferred powers in HSE/SLT matters is ensured. In this regard, the letters of transmittal for proxies/empowerments explicitly reference the organisational tools related to the tasks and responsibilities assigned to the relevant organisational position. These letters of transmittal are signed by the proxy/representative for acceptance and returned to the company administrative office for archiving and storage;
- the system of responsibilities is structured across all levels of the operational line, in relation to the complexity of the activities and productions, with necessary empowerments conferred for appropriate distribution of duties within the company;
- empowerments at different levels of the operational line are formulated in writing and detailed in specific company documents, clearly outlining the assigned tasks, attributed responsibilities and granted powers;
- specific management systems ensure the verification of the managerial and professional suitability of individuals to whom empowerments are conferred;
- representatives have a duty of oversight and must report any needs for action, as well as a general duty to intervene to ensure legal compliance in situations where they exercise their empowerments;
- specific internal processes and information systems ensure the transmission of relevant information to the responsible positions at various levels for the fulfilment of their duties;
- adequate tools are implemented to ensure the information, instruction, learning verification and training of employees on safety, health, environment, public safety and sustainability topics;
- the dissemination of acquired knowledge and experiences is carried out through a comprehensive communication system;

- certification processes are implemented according to international norms and standards.

In addition to the tasks already defined, the company's QHSE Unit performs the following duties:

- collaborates in defining corporate policies in the HSE/SLT domain;
- monitors the evolution of European and national regulations concerning HSE/SLT;
- promotes the dissemination of legal standards in this area, providing expert opinions and knowledge on cross-cutting issues, and generally serves as a reference point for HSE/SLT know-how and methodological aspects;
- provides timely information and guidance to the Headquarters functions and Operational Units;
- proposes the continuous updating of the company's procedures/opi in HSE/SLT matters, ensures the incorporation of legal and general interest regulations and advises the Operational Units on implementing procedures/operating instructions in accordance with the corporate HSE/SLT policies;
- proposes the certification program for the Management Systems of the Operational Units and defines the criteria for conducting audits, coordinating their implementation to ensure that individual Operational Units follow strategic HSE/SLT guidelines while respecting their autonomy;
- promotes and coordinates technical audit activities, including compliance verification with control standards pursuant to Legislative Decree no. 231/2001 as amended and supplemented, within Operational Units/organisational structures, to ensure they implement the strategic and operational HSE guidelines established in policies, the HSE/SLT Management System and company procedures/operating instructions, as well as verifying regulatory compliance while respecting their autonomy;
- ensures the acquisition, verification and consolidation of necessary data, feeding the database and reporting system of activity indicators and company results on relevant topics;

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- provides periodic information through the HSE/SLT reporting system, where each Employer, with the involvement of their organisational structure, inputs all relevant data as required by company regulations, including explanations of any identified issues and the interventions implemented or planned in the HSE/SLT domain within production units/organisational structures;
- verifies the compliance of significant company investment proposals with legal regulations and corporate policy guidelines in the HSE/SLT area;
- collaborates with the other involved functions in drafting the HSE/SLT section of the Four-Year Plan;
- contributes to defining and adopting best practices;
- contributes to defining accounting systems for reporting and adopting information systems consistent with Eni's reporting;
- ensures liaison with the Eni HSEQ function and the correct flow of requested information.

All personnel working on behalf of the organisation contribute to achieving HSE/SLT performance within their respective areas of competence. To this end, contractors operating within the Operational Units are also involved.

Versalis has established an HSE/SLT organisational structure tailored to its needs, which involves personnel at both managerial and operational levels, in accordance with current legal requirements and Eni's policies and strategies.

The relevant units within the HR function keep the organisational structure, responsibilities and related organisation charts up to date. Specifically, the list of individuals involved in managing HSE/SLT aspects must be kept current, including their specific competencies, roles and responsibilities, their formal role designation documents as required by law, the documents related to the formal acceptance of roles where applicable and the checks conducted for assigning responsibilities.

The updating process must be carried out periodically or based on any changes and alignment needs with the HSE/SLT Professional Area Model. These review activities are documented and traceable in the review activities.

All personnel working on behalf of the organisation contribute to achieving HSE/SLT performance within their respective areas of competence. To this end, contractors operating within the Operational Units are also involved.

The responsible positions within the Operational Units, in implementing the HSE and Health Management System, are tasked with the following:

- ensuring constant and complete implementation of the HSE/SLT Policy;
- allocating sufficient technical and financial resources to ensure effective control of HSE and Health aspects and the effective operation of the Management System;
- defining, in agreement with the HR Business Partner Management (HR), human resources and organisational solutions appropriate to the nature of the business conducted, the HSE and Health objectives and the related implementation programmes;
- identifying the most suitable operational solutions;
- ensuring strict compliance with applicable legislation and internal directives;
- ensuring the achievement of the HSE/SLT objectives set by Versalis and the implementation of the related Four-Year HSE/SLT Plan;
- promoting staff involvement through systematic activities of the HSE/SLT Committees at various organisational levels;
- periodically reviewing the adopted solutions and the allocation of resources for managing HSE/SLT activities.

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For managing health within the employer's line, the Employer appoints the following roles, in accordance with the criteria defined in the MSG SLT: the doctor responsible for healthcare, the doctor responsible for medical emergencies and the doctor responsible for occupational medicine (Occupational Health Physician). The responsibilities associated with each medical role can also be assigned to a single professional with proven competence.

The updating process is carried out at regular intervals or based on any changes and alignment needs with the HSE/SLT Professional Area Model. These review activities are documented and traceable.

5.2.2.4 Consultation and worker participation

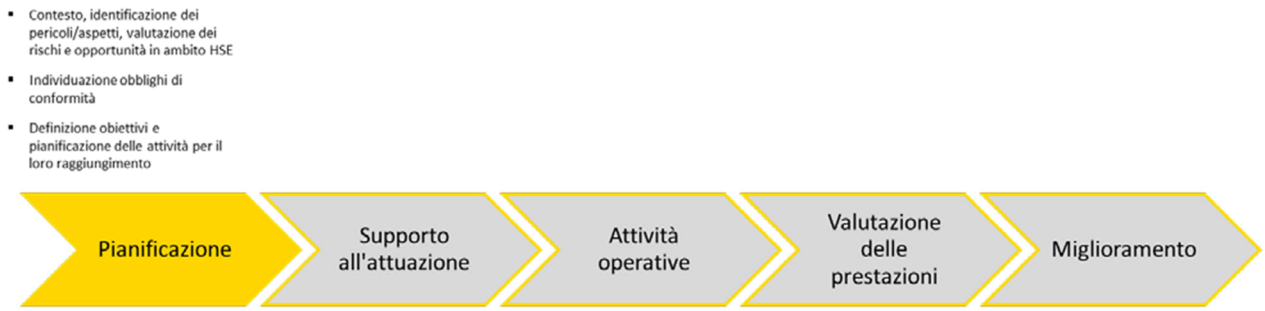
The HSE/SLT functions of Eni and Versalis oversee the adoption of systems and tools for knowledge management and benchmarking, as well as suitable information systems to ensure a consistent approach to critical aspects of HSE activities, particularly those related to monitoring and reporting.

To facilitate the process of sharing HSE knowledge, the HSE portal, accessible through the Myeni Intranet site (hse.eni.it), provides information to promote the exchange and dissemination of technical information.

The company's QHSE Unit, in connection with the LD/SC, conducts benchmarking processes with peer companies/organisations in its sector, aimed at identifying international best practices for the protection of health, safety, environment, public safety and sustainability. Improvement actions resulting from benchmarking activities are included in Versalis's four-year and annual HSE/SLT planning.

Regarding the roles and involvement of worker representatives, please refer to section 5.2.2.3 'Organisational Roles, Responsibilities and Authorities' of this document. The processes for worker consultation and participation are regulated by various regulatory tools available in Eni's "New Eni Management and Organization System" (NEMO'S) application. For worker involvement, please refer to section 5.2.4.4.1 'Internal Communication and Promotion of HSE/SLT Culture'.

5.2.3 Planning



The phase known as "HSE/SLT Planning" includes the following sub-processes:

- ***Analysis of the context***, characterising factors, stakeholder issues and identification of the major ones on the subject of HSE/SLT, aimed at mapping the needs, expectations and constraints of stakeholders and assessing which ones, due to their importance, should be considered in the development of the HSE/SLT Management System and ***identification of hazards/aspects, assessment of risks and opportunities***, aimed at identifying the most important hazards in order to determine risks to people, assets, the environment, public safety, sustainability and the organisation, and to evaluate their significance;
- ***Determination of compliance obligations***, aimed at identifying all applicable compliance obligations in HSE/SLT matters, including those emerging from the context analysis;
- ***Definition of objectives and activity planning***, aimed at identifying objectives for the continuous improvement of HSE/SLT performance and planning activities to achieve them over time.

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HSE/SLT planning is an integral part of the improvement cycle and the broader business development planning process.

Defining areas of commitment, objectives and responsibilities is of primary importance for an integrated HSE/SLT system that aligns a complex organisational entity, with its allocation of functions and delegations, with current regulations and international best practices.

This definition must ensure maximum effectiveness and efficiency of the process as a whole, while also allowing for a rational planning of improvement activities.

The operational objectives for health, safety and the environment are defined based on the outcomes of the review,

taking into account the following: ■ Eni policy;

- Sustainability guidelines;
- Management by Objectives (MBO);
- areas and improvement objectives identified by Eni, also in relation to Eni's sustainable development

model; ■ analysis of the trends of key performance elements/indicators;

- findings from audits/inspections conducted;
- health, safety, environment, public safety and sustainability risks assessed as significant;
- opportunities for improvement in the HSE/SLT domain;
- results achieved by the company in research and technological innovation in HSE/SLT matters; ■

regulatory aspects and the evolution of Italian and international legislation;

- voluntary agreements by the company, anticipations of standards, or more restrictive limits than those required by law;
- improvement objectives directly expressed by the LD/SC;
- benchmarking / international best practices and technological

development; ■ stakeholder expectations;

- state of progress of improvement areas defined in previous reviews;
- analysis of evidence provided by management systems developed in the production units/organisational structures related to employers within their scope.

The LD/SC define their specific objectives with a view to continuous improvement based on the following: ■ corporate operational objectives;

- analysis of the trends of key health, safety, environment and energy performance elements/indicators, including expenses;
- analysis of any discrepancies between results and objectives, also considering the analyses conducted during the review and the identified risks;
- new regulatory provisions on the subject, identification of new needs, or changes in the context;
- substantial changes in the production process or organisational structure and based on technological and scientific progress;
- outcomes of events considered important for HSE/SLT risk management; ■ analysis of the mapping and monitoring of HSE/SLT risks;
- considerations arising from the update of the HSE/SLT risk assessment; ■ any requests, communications, or complaints from external sources.

The regulatory tools governing the planning, management and accounting of expenditure commitments regulate roles, responsibilities and methods for executing and documenting expenses, budgeting, expense reporting and traceability of activities performed.

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During the phase of defining operational objectives, the LD/SC also identify certification programmes in line with their cluster and in accordance with Annex D to MSG HSE.

Each LD/SC monitors the achievement of objectives and the state of progress of programmes on a semi-annual basis and communicates this to the company's QHSE Unit as described in the Professional Operating Instruction "HSE and Health Planning, Monitoring and Reporting Activities" - opi hse 144 ve. This document outlines the operational methods for mapping, measuring, monitoring and reporting on HSE and SLT objectives and programmes.

5.2.3.1 Actions for identifying risks and opportunities

Each LD/SC translates the guidelines for drawing up the Four-Year Plans into specific and measurable objectives (KPI), incorporating them into their own four-year plan along with the corresponding spending commitments.

In the HSE/SLT Four-Year Plans, the LD/SC specifically define the certification and certification maintenance programmes for their activities.

The QHSE function subsequently forwards the BU's HSE/SLT Four-Year Plans to the Eni HSEQ function for inclusion in Eni spa's HSEQ Plan, as well as to the Health function and the BU's senior management.

The timelines for carrying out these activities are provided by QHSE, in alignment with Eni's Planning calendar.

The definition of activities and operational methods for developing the HSE/SLT Four-Year and annual plans are outlined in the Professional Operating Instruction "HSE Planning, Monitoring and Reporting" of the BU management system.

This process allows for the strategic directions of Eni and the BU to be linked to the objectives of the LD/SC. The phase of identifying the context and risks/opportunities is inherent in the risk assessment process and its updates, and it becomes part of the objectives during the review phase

5.2.3.1 Hazard identification

Through the identification and assessment of HSE and SLT risks, in accordance with and applying the regulations in the country where activities are conducted and the HSE/SLT policy, the LD/SC aim to identify key areas of concern and improvement. This is to implement appropriate (managerial/technical/organisational) measures for prevention, protection and mitigation, ensuring the safety of employees, contractors, all individuals accessing the Operational Units, including visitors and the public, as well as protecting the integrity of assets, the environment and the company's public safety.

The company's QHSE Unit, based on regulations, any voluntary agreements, current Eni and Versalis provisions and the requirements set by the Eni HSEQ and SLT function, provides the LD/SC with guidelines on methodologies and minimum acceptability criteria for identifying and assessing their HSE and health risks and for classifying them uniformly.

The LD/SC adopt and implement specific regulatory (procedures/operating instructions) and/or organisational tools that, in line with Eni's guidelines and as outlined in this document, define the roles, responsibilities and methods for hazard identification, HSE and health risk assessment and the development of mitigation measures for worker health and safety, environmental protection, public safety and sustainability.

In particular, Employers:

- define roles, responsibilities and training needs for personnel involved in conducting HSE/SLT hazard identification and the assessment and control of related risks and impacts;
- verify the competency requirements of the personnel involved, as mentioned in the previous point;
- ensure traceability of the involvement of legally required figures and/or those identified by the Employer's directive

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- adopt evaluation and acceptability methods and criteria for different risk categories (including ergonomic and organisational risks) and assess the significance of various environmental aspects, in compliance with current regulations and prescriptions and in line with Eni and Versalis guidelines;
- ensure the inventory and characterisation of equipment and machinery;
- ensure the inventory and characterisation of the chemicals used;
- define roles, responsibilities and methods for developing prevention, protection and risk mitigation measures for worker health and safety and environmental protection.

The continuous process of identifying HSE and Health hazards, assessing related risks and impacts and developing mitigation measures involves both human resources and facilities and products across all operational phases (normal, abnormal and emergency), using advanced and appropriate methodologies for hazard, risk and impact analysis.

Specifically, the process:

- for new facilities and modifications to existing facilities, must begin at the design and construction phase and conclude with their decommissioning and site restoration;
- for products, must consider the entire life cycle (production, distribution/handling, use and final disposal);
- for business activities, must take into account the organisation of work;
- for external sources, must consider all potential impacts from facilities, products and activities not owned but still adjacent to and/or capable of interfering with the facilities, products and activities related to the Employer.

The process is documented by Employers to ensure its constant adequacy and effectiveness, and to:

1. systematically identify HS hazards and related environmental aspects

   concerning:
   - facilities, infrastructure, equipment;
   - processes, activities, work organisation, behaviours and other human factors;
   - internal and external workplaces and nearby locations affected;
   - people working on behalf of the organisation or accessing workplaces or otherwise affected by the LD/SC's activities;
   - materials/substances used or produced;
   - changes in organisation, activities, materials and Management Systems;
   - legal obligations and other subscribed requirements;
   - activities not directly under the organisation's control but indirectly influenced by it;
2. evaluate, using appropriate criteria, HS risks and the risks and opportunities arising from significant environmental aspects (both direct and indirect) and their impacts;
3. select, evaluate and implement suitable measures to prevent, eliminate and/or mitigate risks according to the following priority criteria:

- elimination of the specific impact or risk, where possible;
- substitution of the process/activity/substance with one of lesser impact;
- reduction, where possible, of specific impacts or risks through:

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- implementation of technological measures to minimise impact; or development of signage, procedural controls and collective prevention measures;
- development of personal protection measures.

- acceptance of the residual risk or impact based on analysis and demonstration of compliance with acceptability criteria, where the minimum requirement is regulatory compliance;

4. evaluate the effectiveness of the implemented measures and define any further corrective, mitigation, or improvement measures to be included in the planning documentation.

For business activities and processes conducted abroad, in remote and/or challenging locations, the LD/SC identify any specific HSE and health hazards and risks, ensuring their consistency and adequacy with local legislation. In the absence of local legislation, measures suggested by Eni are adopted, and where multiple requirements exist, the most stringent ones are applied.

The process of identifying and assessing HS risks and the risks and opportunities arising from significant environmental aspects (both direct and indirect) is periodically reviewed (at least during the review activity) to verify its effectiveness and alignment with the organisation's reality. It is updated based on:

- results and analysis of the annual monitoring;
- accumulated experience (know-how);
- new knowledge acquired, including insights from any emergencies and incidental events;
- technological and regulatory developments;
- implementation of any organisational, procedural, process and facility changes.

The LD/SC define the most suitable prevention and protection measures for managing impacts or risks associated with HSE/SLT aspects, in line with the company's specific procedures/opi and the specific environmental situations, as well as in accordance with local HSE/SLT legislation.

These measures must include appropriate actions to preserve environmental conditions, and the safety and health of local communities.

At least annually, provided there have been no significant changes or events in the Operational Unit, Employers inform the company's QHSE Unit through their review activities about the improvement plans defined in response to the analysed risks, along with their implementation timelines. This is to enable monitoring the follow-up actions until their completion.

This activity is reported within the company review and then communicated to Eni's QHSE and SLT functions. This occurs while maintaining that the responsibility for implementation remains with the Employer.

5.2.3.2.1 Safety risk identification and assessment

The identification of hazards and the assessment of risks to the safety of workers and assets is an iterative process. It utilises analysis and evaluation methodologies defined in specific company procedures/professional operating instructions, and subsequently, those of the Operational Units/Employer Lines of Versalis and directly and indirectly controlled companies, both Italian and foreign, under Versalis. This process is documented and periodically reviewed, also based on regulatory requirements, to evaluate its ongoing adequacy and effectiveness.

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The main tools and methods that can be used for the systematic identification of hazards include:

- Hazard and Operability analysis (HAZOP);
- FMECA – Failure Mode, Effects and Criticality Analysis. A technique used to identify failure modes of specific components, their consequences and critical elements;
- Risk Based Inspection (RBI);
- Fault Tree Analysis (FTA);
- ETA – Event Tree Analysis. A method that starts from the Top Event and identifies possible evolutions, determining various incident scenarios;
- classification of Areas and Explosion Protection Document (DPCE);
- Risk Assessment Document for Worker Health and Safety (DVR);
- ATHOS – an IT platform that locates hazards by site/facility and provides guidance on the safe use of individual chemicals through exposure scenarios;
- Safety Process (PS);
- SIL Allocation, SIL, Verification SIL Optimisation/SIF Upgrade;
- analysis of accidents, incidents, near misses and unsafe conditions/unsafe acts that have occurred in the past both within and outside Versalis's domain;
- use of appropriate checklists for identifying hazards related to machinery, equipment, work environments, work organisation, etc.;
- analysis of corrective actions from Process Safety activities;
- Bow Tie for the identification and representation of SECE - Safety, Environmental Critical Elements;
- Fire Risk Assessment;
- Engineering approach to fire protection design;
- Assessment of natural events (NATECH);
- any other references from stakeholders.

The choice of one or more tools and methods, and their level of detail, will depend on the complexity of the activity under examination and contingent factors.

The assessment of risks associated with identified hazards is carried out through the determination (risk analysis) or estimation (risk assessment) of the frequency/probability of occurrence of potential events associated with the hazards and their severity in relation to the consequences.

For risks related to facilities, the frequency associated with the incidental event is calculated using statistical analyses of recurring component failures, process anomalies and behavioural anomalies.

For risks to people, the probability and severity associated with the incidental event are estimated based on experience, statistical analyses and available literature on similar occurrences both within and outside Versalis.

The assessment of identified risks includes an analysis of their acceptability through predefined criteria, in the form of risk matrices. These matrices define the acceptability threshold in terms of frequency of occurrence and severity of consequences or equivalents, as defined in specific company procedures/operating instructions, of Operational Units, or directly and indirectly controlled companies, both Italian and foreign, under Versalis.

Risk acceptability concerns the safety of company and contractor personnel, public safety, asset integrity, environmental preservation and the protection of the company's reputation.

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5.2.3.2.2 Health risk identification and assessment

The identification of hazards and the assessment of risks related to workers' health, in accordance with the MSG SLT, is a structured process. Specifically, the Employer identifies health hazards within their line of responsibility by:

- analysing the work environment and the work and industrial processes;
- cataloguing all hazards identified from the previous analysis for the purpose of assessing potential health risks.

The Employer, assisted by the occupational health physician and with support from the LD health function, proceeds with the assessment of health risks and opportunities, taking into account:

- execution of appropriate detection activities (including environmental/personal measurements);
- appropriate evaluation methods for each type of risk, as provided by specific regulatory tools and applicable legislation;
- determination of the level of exposure;
- comparison of data and/or estimates with reference limits;
- measures in place to contain possible exposure to risks (e.g., organisational measures, collective or personal protective equipment, safety data sheets).

The outcomes of the health risk assessment are recorded in a dedicated risk register[2], approved by the Employer. This document must be available for consultation by the competent authorities and shared with workers or their representatives, in accordance with applicable regulations.

The methods for identifying and assessing risk agents are described in company procedures/operating instructions and, subsequently, those of the Operational Units and directly and indirectly controlled companies, both Italian and foreign, under Versalis. These methods consider:

- all routine and non-routine work activities;
- all personnel accessing the workplaces;
- processes, structures, operational methods and substances used in workplaces, whether company-owned or third-party;
- changes, including temporary ones, and their impacts on operations, processes, and activities;
- any legislative obligations related to risk assessment and associated control activities;
- unpredictable and incidental conditions.
- Controlling workers' exposure to risk agents is a fundamental element in the health risk assessment process. Exposure to risk agents is compared with the acceptability criteria defined to classify risks in terms of significance.
- Based on the exposure assessment and risk classification, targeted health surveillance is planned according to the risks to which workers are exposed.

2 For Italy, the outcomes of the risk assessment are included in the Risk Assessment Document (DVR in accordance with Legislative Decree No. 81/08 as amended).

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Versalis is committed to identifying the potential positive and/or negative health impacts on the population resulting from its industrial activities, with the aim to:

- preserve the health of communities residing near Versalis's operational areas;
- gather useful elements to evaluate and apply the most appropriate approach in terms of prevention, minimisation and mitigation of negative impacts during the various phases of industrial projects;
- enhance positive impacts by creating synergy between community health initiatives at the local or central level.

The Health Impact Assessment (HIA) can be divided into two types:

- strategic HIA: this aims to analyse the potential health impacts of the industrial sector in the geographical areas of interest. The information from this analysis is useful not only at the company's operational level but also for local authorities and administrations to develop and adopt appropriate policies and guidelines;
- the project HIA is conducted during the different phases of a specific industrial project to analyse and identify the potential positive and/or negative impacts of industrial operations on the state of health of populations, plan what is needed for their management and conduct follow-up.

Additionally, the assessment of health impacts, conducted both ex ante (predictive assessment) and during operational activities, can be initiated under the following circumstances:

- in compliance with local laws regarding environmental, social and health permits (permitting);
- in the case of a new project or a substantial change to existing activities/facility modifications, or at the request of the competent authorities;
- in accordance with company standards for analysing the impacts of industrial projects (e.g., ESHIA or stand-alone studies), when applicable legislation does not require the submission of specific documentation.

In any case, following the identification of potential health impacts from operational activities, it is the responsibility of the Employer to implement and manage the resulting mitigation plans, assisted by the LD health function, with technical and methodological support from the company's QHSE unit.

The company's QHSE unit promptly communicates all HIA requests received from the competent authorities to Eni's health function.

5.2.3.2.3 Identification of environmental aspects and assessment of their significance and risks

The identification of environmental aspects and the assessment of their significance is carried out through an iterative process involving the following main phases:

- identification of activities, processes, facilities, products and services that have elements (environmental aspects) that can interact, directly or indirectly, with the environment;
- identification of aspects generated by each activity in all phases, under standard, abnormal and emergency operating conditions;
- identification of impacts related to each aspect;
- evaluation of the significance of environmental aspects using qualitative, parametric and numerical classification criteria.

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The evaluation covers both direct environmental aspects, over which full management control is exercised, and indirect aspects, over which there may be influence but not total control (e.g., activities carried out by contractors at sites or related areas).

The assessment of significance uses a combination of parametric criteria that consider:

- current regulations and potential future developments;
  - potential impacts on sensitive environmental components affected by the activities;
- the specific characteristics of the Operational Units and the processes present within them;
  - the relevant territorial context and a numerical criterion:
  - the probability of a particular impact occurring.

For indirect environmental aspects, significance is assessed by also examining the influence that can be exerted and the measures that can be adopted to mitigate their impacts.

For both direct and indirect environmental aspects deemed "significant", it is necessary to proceed with the identification, assessment and management of the risks and opportunities deriving from them.

The definition of the criteria and methods for identifying environmental aspects, assessing their significance and evaluating the associated risks and opportunities, along with their periodic reviews, is entrusted to procedures/operating instructions developed at the company level and, subsequently, at the Operational Unit level and for companies directly and indirectly controlled by Versalis, both in Italy and abroad.

5.2.3.3 Determining legal and other requirements

Versalis, through the company's QHSE unit, monitors and promotes the dissemination of applicable national and international regulations, technical standards and international HSE/SLT standards to relevant personnel. This is achieved through the set of organisational and regulatory tools within Eni's HSE/SLT framework, which:

- regulates roles and responsibilities regarding the identification and updating of information about applicable legislation and other relevant Health, Safety and Environment requirements;
- ensures correct methods for identifying and accessing legal requirements and other commitments undertaken by the organisation in the HSE/SLT domain;
- allows for the development of Versalis's HSE/SLT Management System in accordance with and respecting applicable current legislation;
- defines criteria and methods for disseminating information on legislative and regulatory requirements to personnel working for Versalis and other stakeholders.

The company's QHSE unit systematically, though not exhaustively, monitors and updates legislation related to HSE and Health topics through contacts and collaborations with Eni's HSEQ and Health functions and industry associations, and by consulting electronic legislative databases, specialised industry journals, newsletters and bulletins.

Additionally, the HSE Regulatory Review, prepared quarterly by the competent structures of Eni's HSEQ Function, is available on Eni's intranet portal, in the HSE section.

The definition of methods for collecting and updating legal and other requirements is entrusted to the professional operating instruction opi hse 113 ve, in alignment with Eni's regulations.

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The LD/SC are responsible for:

- preparing and maintaining an archive of local, national, and international laws/regulations and an archive of voluntary HSE and Health standards relevant to their activities, including the MSG HSE/SLT and its annexes, as well as all applicable regulatory tools of Versalis. It is the responsibility of the QHSE manager of the Operational Unit to update their register of applicable requirements promptly or at least semi-annually.
- regulating roles and responsibilities regarding the identification and updating of information about applicable legislation and other relevant Health, Safety and Environment requirements;
- defining criteria and methods for disseminating information on legislative and regulatory requirements to personnel working on behalf of the Company and other stakeholders;
- ensuring that activities related to obtaining, modifying and/or renewing permits are conducted in compliance with current legal requirements;
- identifying, with the support of the company's QHSE unit, the procedures for requesting a new permit or modifying existing permits;
- defining roles, responsibilities and methods for preparing the appropriate documentation required for submitting a permit application;
- defining the methods for communicating the acquisition, modification and/or renewal of permits to relevant parties;
- defining the traceability of the authorising process from data collection to the communication of the outcome;
- defining the methods for monitoring the validity of permits and maintaining them (e.g., scheduling).

The company's QHSE unit, as part of its auditing activities at the LD/SC, periodically evaluates the effectiveness of the tools adopted to ensure compliance with the applicable legislative and regulatory framework concerning all obligations listed in the schedule.

5.2.3.4 Planning activities – setting objectives and planning for their achievement

The HSE/SLT planning process is part of Eni's broader strategic planning process, with the definition, within the framework of the CEO’s guidelines, of the directions of Eni's HSE/SLT function, in line with the principles and commitments expressed in the Policies.

The definition of Versalis's HSE/SLT planning process is entrusted to procedures and operating instructions developed at the company level and, subsequently, at the level of Operational Units and, both Italian and foreign, directly and indirectly controlled companies under Versalis. Versalis's strategic objectives in Health, Safety and Environment are defined in the HSE/SLT Four-Year Plan, which is drawn up on an annual basis.

This document, for the upcoming four years and based on the competitive economic scenario, defines the development directives for those HSE and Health topics considered significant in relation to the context in which the company operates, the development of regulations and best practices.

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The Plan Proposal is developed by the company's Quality, Health, Safety and Environment Unit, with contributions from the company units, Business/Service Units and Operational Units, each within their area of expertise. This is done with a view to continuous improvement aimed at reducing HS risks and environmental impacts, taking into account:

- strategic directions defined by Eni's QHSE and Health functions;
  - Versalis's HSE/SLT policy;
  - documents outlining the guidelines established by Eni's Chief Executive Officer during the overall planning process, which are further detailed according to the specific activities carried out in the Operational Units;
  - objectives and structure of Eni's sustainable development model;
- sustainability guidelines issued by the relevant Eni functions;
  - evolution of relevant regulations;
  - legal requirements;
  - emerging contextual issues;
  - specific HSE/SLT aspects of Versalis's activities;
  - any HSE/SLT issues reported following management review by employers (methods are defined in a specific regulatory tool);
  - consolidation of improvement actions – resulting from reviews by various employers – identifying any cross-cutting elements applicable within the same business unit;
    - findings from audits;
- prescriptions/findings from public administration entities;
  - feedback from stakeholders;
- potential technological development initiatives offered by the best available technologies;
  - documentary evidence required by HSE/SLT management systems;
  - development opportunities offered by the continuous evolution of technology in the HSE/SLT field;
  - state of achievement and alignment with objectives defined in previous improvement plans.

The plan details:

- specific HSE/SLT objectives that permit verifying and measuring the effectiveness of the action contemplated by the plan, following its implementation;
- the parties involved and their responsibilities for executing the activities outlined in the plan;
- implementation timelines and the resources (financial, human, logistical, etc.) necessary to achieve the set objectives;
- HSE/SLT verification/audit programmes (TA, VC, PSA and VCS);
- certification/maintenance programmes for already acquired certifications (AC);
- references to HSE/SLT training, information and training programmes.

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The Annual HSE/SLT Action Plan, an integral part of the HSE/SLT Four-Year Plan, provides more comprehensive and detailed information regarding actions scheduled to begin in the first year (budget year).

The progress of the Annual HSE/SLT Action Plan serves as a reference for defining the subsequent Four-Year Plan.

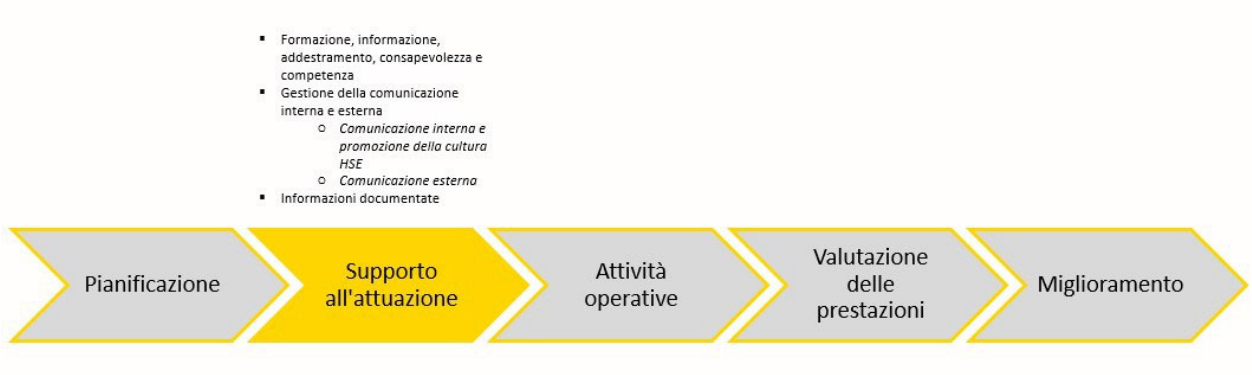
Once approved by the CEO of Versalis and by the President, the HSE/SLT Four-Year Plan is transmitted to the Operational Units involved in both planning and implementing the contemplated actions, in order to ensure adequate understanding. It is also sent to Eni's HSEQ Function, which consolidates it at the Eni group level. The overall HSE/SLT Four-Year Plan is consolidated in the "commitment to sustainable development" section of Eni's strategic plan, managed by the function responsible for sustainability, following a consistency check with sustainability guidelines.

The periodic review of strategic objectives represents the first stage of the continuous improvement cycle and must be documented.

Each Employer verifies the alignment of their specific HSE/SLT objectives with those identified in the company's Four-Year and Annual HSE/SLT Action Plans, ensuring their measurability and monitoring in their own four-year/annual HSE/SLT plan.

The Operational Units/Subsidiaries are responsible for implementing their respective parts and periodically verify the progress of the plans prepared, adopting any corrective actions necessary to achieve the specific objectives defined.

5.2.4 Support



The phase known as "Support" for HSE/SLT implementation encompasses the range of, both tangible and intangible, means and resources necessary for implementing the HSE/SLT process.

The Employer, with the support of delegated and/or designated figures, is responsible for the implementation and operation of risk/impact/use management activities within their area of competence.

The Support phase for HSE/SLT implementation consists of the following sub-processes:

- ***Resources, training, information, awareness and competence***, this sub-process aims to identify the resources and training needs in the HSE/SLT domain for personnel and to plan and deliver training activities to ensure workers have adequate knowledge and skills;
- ***Management of internal and external communication***, this sub-process is designed to ensure an effective flow of HSE/SLT information to and from workers and internal and external stakeholders;
- ***Documented Information***, this sub-process aims to ensure the proper management of relevant HSE/SLT documentation, both in terms of regulatory tools (design) and evidence and records (implementation).

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5.2.4.1 Resources, training, information, instruction

During the review activity, resources subject to planning are analysed, including any needs for personnel, infrastructure and information systems. The planning of economic resources coincides with the planning of HSE and Health expenses in accordance with pro hse 017 eni "Planning, monitoring and reporting of current expenses and HSE investments". Planning and actual expenditure data for current expenses and any investments are stored in the NICE and SEGMENT databases.

Activities that present HS risks and environmental impacts must be carried out by personnel with the necessary knowledge and skills, whose training and/or instruction must be continuously updated and documented.

The purpose of HSE/SLT information and training activities is to ensure that personnel, at any organisational level, are aware of:

- their role and responsibilities in relation to both the defined HSE/SLT Policy and Management System and the established HSE/SLT objectives and targets;
- their contribution to managing HSE/SLT aspects and the benefits that result from improving their individual performance.

The pro hr 007 ve "Training" outlines the process of training and engaging personnel and details:

- the roles and responsibilities for delivering training and/or instruction activities;
- the criteria for delivering training;
- the personnel involved in training and/or instruction activities;
- the scope, content and methods, including Periodic Meetings, for delivering training to workers on HSE/SLT aspects and related risks, measures, procedures, roles and instructions for use, based on their role within the organisational structure;
- the timing for delivering training courses;
- the methods for evaluating the effectiveness of the training provided.

The information, training and instruction activities for personnel performing activities with environmental impacts or HS risks also aim to ensure that personnel working on behalf of the organisation are continuously updated on:

- the environmental impacts or HS risks of their activities;
- the mitigation measures for environmental impacts or HS risks related to their activities, including emergency preparedness and response requirements;
- the potential consequences of failing to fully or partially apply the defined mitigation measures;
- the importance of their contribution to identifying and improving the defined mitigation measures;
- the organisation's HSE/SLT policy and HSE/SLT Management System, and the HSE/SLT aspects of the organisation's activities, products and services that could be influenced by their work.

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HSE/SLT training needs arise from:

- the analysis of HSE/SLT knowledge described in Eni's HSE Professional Model;
- legal requirements;
- internal reorganisations within Versalis;
- audit findings.

The phase of identifying training needs considers:

- hiring and job changes;
- development of HSE/SLT competencies;
- maintaining an adequate level of competence in performing activities;
- any changes in activities or technologies used.

Each Employer formalises the training needs in an HSE/SLT Training Plan, which is included in the HSE/SLT Four-Year Plan. Each year, the Operational Units identify the personnel requiring training and determine their participation in courses. This plan also specifically identifies 'mandatory' training activities as required by current HSE legislation (refer to opi hse 111 ve "Training, information, instruction in health, safety, environment and public safety" for activities conducted in Italy). Mandatory training includes ECM credits for doctors. Abroad, mandatory courses for local laws will be reported.

The document is continuously updated in the event of significant technical, organisational, or regulatory changes, or following evidence of non-compliance.

Managers at all levels are committed to:

- identifying the most effective training processes to meet the identified HSE/SLT training needs;
- providing periodic training and information to their personnel on HSE/SLT topics, also through opportunities for discussion and exchange, such as HSE Committees;
- promoting behaviours that contribute to achieving better HSE/SLT results.

Operational Units periodically evaluate:

- the individual performance of their personnel in HSE/SLT matters;
- the effectiveness of their training programmes;
- the overall HSE/SLT training process, with the aim of continuous improvement.

The LD/SC periodically verify and report to their respective competent functions the status of mandatory HSE/SLT training delivery and the related costs, entering the data into the relevant databases.

Training is conducted in classrooms or delivered via e-learning to acquire basic HSE/SLT safeguarding knowledge, and "on the job" to strengthen specific knowledge for effectively managing HSE/SLT aspects in operational activities.

A highly effective tool in the process of informing, training and engaging personnel on Health, Safety and Environment aspects is the set of HSE Committees, governed by a specific professional operating instruction (opi hse 139 ve).

Exercises are periodically organised to assess the level of preparedness for managing incidents and emergencies.

Comprehensive HSE/SLT training is provided to Worker Representatives for Safety and the Environment.

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5.2.4.2 Competence

The LD/SC, utilising their managers at all levels, are committed to identifying and maintaining the competencies of personnel within their scope, ensuring they are adequately and periodically trained and informed on health, safety, environment, public safety and sustainability topics. For each sensitive HSE role, minimum competencies are identified as highlighted in the document msg hse – annex N “Assignment of tasks to sensitive HSE roles" and the company procedure pro hse 003 ve "Roles, responsibilities and tasks in health, safety, environment, public safety and sustainability in the workplace, pursuant to Legislative Decree No. 81/2008 as amended and supplemented”.

5.2.4.1 Awareness

All personnel are made aware of their responsibilities in meeting HSE/SLT requirements and the benefits of continuous improvement.

Specifically, personnel are informed about the requirements and activities outlined in the HSE/SLT System to enhance performance and the impact of their activities on energy consumption and other HSE/SLT aspects, contributing to the achievement of objectives and targets. The LD/SC establish internal communication methods regarding HSE/SLT topics, which include:

- periodic information on health and workplace hygiene;
- periodic information on safety;
- periodic information on environmental management;
- periodic information on incidents and near misses;
- information related to emergency plans;
- information for visitors regarding relevant risks and emergency plans.

Each LD/SC ensures involvement and support in managing HSE and health aspects for all participants in various activities through a process of consultation and communication.

This process is implemented, documented and tracked based on criteria and methods defined in specific organisational and/or regulatory tools by the LD/SC. These tools include convening periodic meetings of relevant HSE and Health figures and management to verify and monitor the management of HSE and Health aspects, and using tools (such as emails and shared drives, etc.) to disseminate HSE and Health information to personnel, contractors and other interested parties.

The consultation and communication process particularly involves:

- the development and review of HSE/SLT policies;
- the development and review of procedures for managing HS risks, including hazard identification, and managing environmental aspects, assessing their significance and the associated risks and opportunities;
- changes that may affect the work environment (introduction or modification of installations and materials, processes, procedures, or work patterns).

With personnel involvement, HSE/SLT risks in the workplace and measures to mitigate them are identified.

5.2.4.1 Communication

Versalis places particular importance on managing communication in the HSE/SLT domain. This process allows facilitating the exchange of information among different company functions, maintaining a high level of awareness regarding HSE and Health matters and all current and emerging aspects, conveying Eni's HSE/SLT values to internal and external stakeholders and promoting the dissemination of HSE/SLT culture across all areas.

The communication processes are defined to:

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consider applicable compliance obligations, relevant stakeholder perspectives and concerns;

- ensure that communicated information is consistent, reliable, understandable and complete;
  - guarantee the traceability of communications made.

5.2.4.4.1 Internal communication and promotion of HSE/SLT culture

Versalis adopts the information systems provided by Eni.

To facilitate the process of sharing HSE and Health knowledge, the HSE portal, accessible through the Myeni Intranet site, provides information to promote the exchange and dissemination of technical information, including the entire body of documentation. The HSE portal provides information such as:

- Eni procedures/operating instructions;
  - HSE/SLT performance expectations;
  - Updates on primary and secondary legislation, both national and international, on topics of interest to the Group;
  - A map of Eni's HSE/SLT personnel and their specialisations;
  - HSE Data Reporting Manual and related guides for HSE data collection;
  - Databases of HSE/SLT performance, particularly variables that need continuous monitoring (e.g., injuries, incidents).

Within the company Intranet, several services with enabled access are also available:

- Chemical agents and SDS database (ATHOS);
  - Integrated SHERPA database (HSE reporting);
  - HEIS database (Health reporting);
- HSE Environment database (management of environmental data: air, water, soil, GHG, etc.);
  - INDACO Incidental Events Database;
  - SYNERGI Audit database;
  - Industrial Medicine and Hygiene Information System (HSE/ARAMIS);
  - ECOS Information System (waste management);
- IUCLID Information System;
  - Industrial Hygiene Sharepoint;
  - Product Safety Sharepoint;
  - Product Stewardship Sharepoint;
- Occupational and Process Safety Sharepoint;
  - Electronic Work Permit (EWP);
- Information System for Personal Protective Equipment (IS-PPE);
  - GIS Cartographic Database System (3TER);
- Third-Party Safety Management (GST);
- Email (Benchmarking etc.).

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Employers, with the support of their HSE/SLT structures, ensure the dissemination of information within their areas of competence and identify initiatives to raise awareness and promote HSE/SLT culture. This is aimed at creating shared and widespread awareness among all workers about the key values and objectives of HSE and Health, and actively and proactively involving each worker.

5.2.4.4.2 External communication

Eni has a specific MSG External Communication (COE) that outlines the methods for defining Eni's external communication strategy and the related plan, through media outlets, relationships with consumer associations, editorial activities and by setting directions and defining objectives.

The functions responsible for external communication and relations at Eni and Versalis, in accordance with the roles and responsibilities established by current organisational and regulatory tools, ensure the maintenance of relationships with associative bodies and other stakeholders for communication, information and engagement on HSE and Health topics, as well as external communication to the media. In this regard, Eni's HSEQ function and the company's QHSE Unit provide the necessary technical-specialist contributions.

Eni and Versalis periodically promote meetings with stakeholders to share informational needs and identify forms of collaboration.

5.2.4.5 Documented information

5.2.4.5.1 General considerations

The company's QHSE unit exercises its guiding role by developing, in agreement with Eni's HSEQ function and relevant corporate functions, a regulatory framework in the HSE and Health domain, also to regulate the management of documented information. The development and continuous improvement of the regulatory framework are ensured through the collection and sharing of the need for updates to regulatory tools between Eni's competent HSE function and the LD/SC.

The documentation of the HSE and Health Management System includes, in addition to the applicable Eni and Versalis documentation:

- operating instructions;
- records;
- documented evidence.

The entire body of documentation from Eni and Versalis is available to all employees through the company intranet portal "Nemo's". The regulatory tools specifically related to HSE are also available on the HSE portal on the page:

http://www.hse.eni.it/it_IT/pagine-interne/Management/HSE_Management.shtml

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The document body of the HSE and Health Management System of the LD/SC is, in principle, composed of the following main documents:

- HSE/SLT regulatory tools or those with HSE implications from Eni that are adopted or directly applicable;
  - HSE/SLT regulatory tools or those with HSE implications from Versalis;
- HSE/SLT regulatory tools or those with HSE implications from the LD/SC;
  - internal and external emergency plans;
- safety, health and environment documents in compliance with legal and regulatory HSE and Health requirements;
  - records of activities performed, results achieved and incidental events;
  - HSE/SLT documents of internal or external origin to Eni (e.g., permits, complaints, communications to and from authorities/local communities);
  - electronic archives;
  - Guidelines and other documents deemed necessary.

The Employer, based on the provided guidelines, identifies the needs and defines the tools and technical/technological supports for managing the documents that constitute their HSE and Health management system, including the related records produced, with particular reference to their preparation, approval, verification, issuance, distribution, availability, receipt, updating and revision, traceability, archiving and storage, protection and disposal. Among the documents that must be appropriately managed are those required by regulations (e.g., permits) and those of an organisational nature (e.g., appointments, delegations).

In particular, the Employer identifies the document body of the management system and the correct methods for managing documentation to:

- ensure compliance with the requirements specified in the specific regulatory tools of Eni and Versalis;
  - facilitate change management and promote staff training;
  - ensure the traceability of operations and the accessibility and verifiability of documentation;
  - facilitate certification activities, audits and system and HSE/SLT compliance checks;
  - ensure communication to personnel and distribution to relevant functions.

5.2.4.5.2 Creation and updating

The company's QHSE Unit and the LD/SC, for aspects related to their management system, define and maintain updated records of the data necessary to demonstrate the effectiveness and efficiency of their HSE/SLT Management System.

The procedure pro sn 001 ve "Management Methods for Regulatory Tools: Procedures and Operating Instructions" describes the management methods for company documentation, particularly that related to the HSE/SLT Management System:

- preparation, approval, coding and issuance;
  - distribution and dissemination;
  - collection and archiving;
  - updating and periodic review of documentation.

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5.2.4.5.3 Documented information management

The management of documented information is necessary to:

- define the hierarchical structure, organisation and coding system of the documentation;
  - ensure the traceability, updating and availability of documents;
- guarantee the systematic and repeatable nature of the activities described in the documentation;
  - facilitate change management;
  - facilitate personnel training;
  - ensure compliance with the requirements specified in the Policies, MSG and procedures/operating instructions of Versalis;
- facilitate certification activities, audits and HSE/SLT system and compliance checks;
  - ensure communication to personnel and distribution to relevant functions;
  - constantly promote audits with cutting-edge methods in the HSE/SLT sectors.

The documentation of Versalis's HSE/SLT Management System consists of documentation relevant to the company's QHSE Unit and that of the Operational Units. The HSE/SLT Management System complies with the provisions of Eni's MSG HSE and MSG SLT.

Company documentation in the HSE/SLT area includes:

- company procedures;
  - operating instructions;
  - technical guides.

The procedures/operating instructions and all other issued documents reference, in order of relevance:

- legal requirements;
  - Eni and Versalis standards;
  - international best practices.

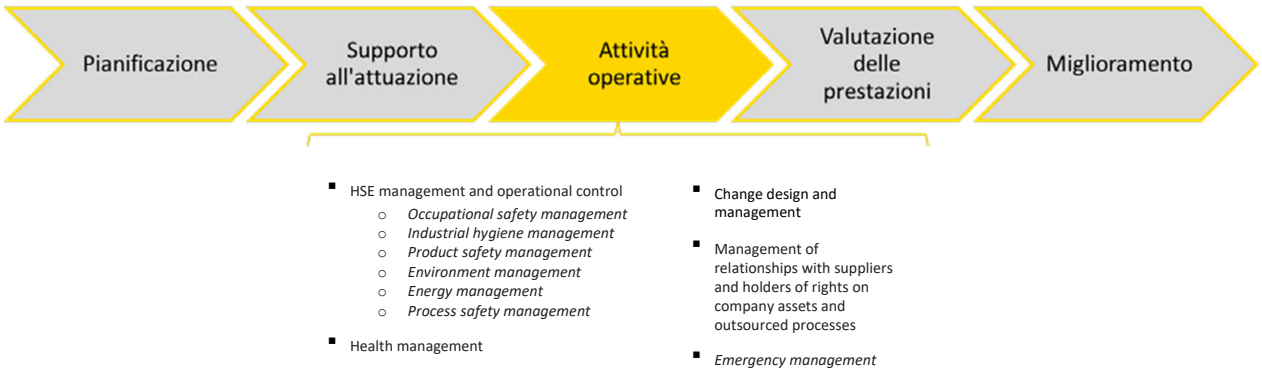
This documentation serves as the reference base for applying the management system in each of the company's Operational Units. Eni's procedures/operating instructions, Versalis's procedures/operating instructions and, subsequently, the procedures/operating instructions of the Operational Units define responsibilities and criteria for:

  - preparation, approval and issuance of documentation to ensure its identifiability and readability;
  - distribution and dissemination of documentation;
  - collection and archiving of documentation;
  - review, updating and periodic revision of documentation and the related media on which it is presented;
- verification of the availability of the current version of applicable documentation at the place of use;
- correct identification of external-origin HSE documentation;
  - prevention of the unintentional use of obsolete documentation.

For the HSE/SLT management system documentation produced by each Operational Unit, refer to the respective management manuals.

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5.2.5 Operating Activities



The phase known as "Operational Activities" encompasses all activities necessary for the effective management, elimination/reduction of HSE and Health risks/impacts and improvement of HSE/SLT performance, as determined by the evaluations conducted.

These activities include actions aimed at mitigating and managing identified HSE/SLT risks/impacts for workers (e.g., emergency management, change management, waste management), as well as actions to manage risks related to HSE/SLT aspects impacting Versalis (e.g., reputational, legal and asset integrity risks) and the methods through which opportunities and improvement objectives are pursued.

In operational activities, the Employer, along with the company's QHSE unit for Product Safety aspects, and their organisational structure, utilise necessary HSE and Health specialist and technical/operational support. They ensure, also through delegated figures, that information related to these activities is recorded and adequately managed to guarantee its availability and traceability, while respecting internal regulatory tools regarding the protection of company information, including privileged information.

Versalis's HSE/SLT Management System ensures that HSE/SLT activities are:

- preordained, or directed towards achieving HSE and Health improvement objectives, consistent with Eni's sustainable development model, among other things, and ensuring operational control of the HSE/SLT aspects of activities;
- responsive to contingent events: whose effectiveness depends on the level of pre-established preparedness;
- relational and communicative, that is to say aimed at promoting maximum involvement of employees and third parties in pursuing objectives, keeping the external world (local communities, authorities, associations) informed about ongoing commitments, and understanding expectations related to the company's commitments and results.

The management phase of "Operational Activities" consists of the following sub-processes:

- ***HSE/SLT management and operational control***, this includes the management of safety, product safety, industrial hygiene and health, and the environment, all integrated and based on criteria of prevention, protection, information, promotion and participation. The objective is to ensure that workers can operate safely and that the environment (both workplace and external), worker and personal safety, sustainability and public safety are protected;

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- ***change design and management***, aimed at ensuring a preliminary assessment of HSE/SLT risks and impacts related to changes (in facilities, organisation, documentation) and the proper management of the modification process;
- ***management of relationships with suppliers and holders of rights on company assets and outsourced processes***, this is intended to ensure the adoption of appropriate selection and management methods (document flows, field checks, feedback) for suppliers, contractors and subcontractors, with the aim of ensuring compliance with mandatory requirements, as well as those of Eni and Versalis;
- ***HSE/SLT emergency preparedness and response***, aimed at identifying possible emergency scenarios and defining measures for emergency response, as well as methods for drills, analysis and reporting.

5.2.5.1 HSE/SLT management and operational control

The sub-process "HSE/SLT Management and Operational Control" encompasses the following areas:

- occupational safety management;
  - process safety and asset integrity management.
  - product safety management;
- management of industrial hygiene and health;
  - management of the environment;

These components are to be considered in an integrated manner. The management of the environment, safety, industrial hygiene, health and product safety is based on criteria of prevention, protection, information, promotion and participation. The objective is to ensure that everyone working on behalf of Versalis can operate safely and that the environment (both external and workplace), public safety and their health are protected.

The elements it is based on include:

- the process of continuous improvement in the efficiency and reliability of facilities;
- the adoption of best practices and operational management inspired by HSE/SLT excellence criteria across all business operations;
- research and technological innovation, specifically focusing on workplace and process safety, product safety, worker exposure, environmental protection, community safety, energy efficiency and, in general, occupational risks;
- the results of auditing activities and the continuous improvement process;
- the definition and periodic monitoring of key indicators and areas for analysis and intervention;
- the periodic monitoring and analysis of incidental events, environmental impacts and the status of environmental matrices;
- the certification programmes for management systems and their maintenance;
  - the consultation and participation of personnel;
  - the definition and development of programmes related to the themes of sustainability and decarbonisation.

To achieve high HSE/SLT performance standards, the company's QHSE Unit, with support from Eni's HSEQ and Health functions and, where required, from employers, prepares the regulatory tools for managing HSE/SLT aspects.

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5.2.5.1.1 Process and Occupational Safety Management

The Employer implements the management of occupational and process safety by:

- identifying hazards and assessing risks and opportunities for the safety of personnel, suppliers, other parties to the extent in which they are involved and assets;
- evaluating risks from interferences between activities;
- developing appropriate prevention and protection measures to safeguard people and assets and constantly maintaining their efficiency;
- operational control of the process and of all the significant activities for safety;
- investigating and analysing HSE events, with particular focus on incidents, near misses and hazardous conditions and actions;
- informing, training, involving and engaging personnel;
- identifying and implementing all continuous improvement measures derived from the above points;
- managing relations with stakeholders.

The outcomes of hazard identification and risk and opportunity assessment activities are essential for defining appropriate prevention and protection measures to safeguard the safety of personnel, all the other parties to the extent in which they are involved in the company's activities and assets. These outcomes are realised in defining an improvement plan that is continually updated to account for changes in facilities and company processes, including work organisation.

The Employer clearly documents activities related to the management, distribution and maintenance of prevention and protection measures to safeguard the safety of workers, contractors, other parties and assets according to specific criteria and methods defined in dedicated regulatory/organisational tools. These tools include:

- roles, responsibilities and methods for verifying the necessary requirements such as suitability, maintenance in good condition, functionality and efficiency of the prevention and protection measures to be adopted;
- methods for periodic verification of the availability and need for updating the adopted prevention and protection measures;
- types and methods for acquiring prevention and protection measures to be adopted by the operational lines under the same Employer; this process is always documented.

The LD/SC, in compliance with the provisions of Legislative Decree No. 81/08 (and country-specific regulations for foreign LD/BU), prepare the Risk Assessment Document in accordance with the Professional Operating Instruction opi hse 001 ve "Risk Assessment for Worker Health and Safety" (for foreign LD/BU, the opi is implemented while considering any country-specific regulatory aspects). Similarly, in the case of activities with contracting companies falling under Article 26 of Legislative Decree 81/08 and/or in the case of Temporary and Mobile Construction Sites under Title IV of the aforementioned Legislative Decree, the LD/SC must apply the provisions outlined in opi hse 133 ve "Single Document for the Assessment of Interference Risks (DUVRI)", pro hse 016 ve "Safety in Temporary or Mobile Construction Sites according to Legislative Decree No. 81 of 2008 as amended and supplemented" and opi hse 143 ve "Safe Execution of Work (Work Permits)" for coordination aspects with the DUVRI (for foreign LD/BU, the opi is implemented while considering any country-specific regulatory aspects).

The LD/SC manage the Personal Protective Equipment (PPE) required for employees as indicated in the Risk Assessment Document (DVR) according to the methods outlined in opi hse 182 ve "Selection, Use and Maintenance of Personal Protective Equipment". It is the responsibility of the Employer to ensure the correct use of PPE by contractors and visitors.

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Sites subject to Article 14 of Legislative Decree No. 105/2015 as amended and supplemented structure the Safety Management System for the prevention of major accidents in accordance with Annex B of Legislative Decree No. 105/15 (for foreign LD/BU, the opi is implemented while considering any country-specific regulatory aspects).

Safety Management is based on criteria of prevention, protection, information, promotion and participation, aiming to ensure the safety of employees, contractors and the public, as well as the integrity of assets.

This management is implemented through the following main phases:

- identification of hazards, risk assessment related to facilities, processes and substances handled, and implementing actions to prevent or reduce them;
- information technology monitoring, investigation and analysis of incidents/accidents, near misses, medical treatments and Unsafe Conditions/Unsafe Acts involving employees, third parties working for Versalis, and major external events to learn lessons and enhance risk prevention and mitigation capabilities;
- systematic use of Root Cause Analysis as a method to identify the root cause of every significant incidental event and to tailor appropriate prevention and mitigation measures;
- use of safety standards, in accordance with country regulations and best practices to prevent/mitigate incidental consequences;
- emergency planning to address and mitigate the consequences of potential incidents;
- systematic information, training and instruction for company workers on safety issues;
- systematic information and verification for third-party training/instruction;
- research into and use of more effective fire-fighting equipment, PPE/CPE and extinguishing agents, as well as safety investigation and analysis methods such as Process Safety Analysis, SIL Allocation, SIL Verification, SIL Optimisation/SIF Upgrade, Risk Based Analysis, Root Cause Analysis, Fault Tree Analysis, Due Diligence Analysis, etc.

The outcomes of the evaluations conducted for hazard identification and safety risk assessment form the basis for establishing appropriate prevention and protection measures to safeguard worker safety. They also contribute to assessments related to new installations, modifications to facilities and business processes, culminating in the definition of an HSE improvement plan.

The activities related to the management, distribution and maintenance of prevention and protection measures to safeguard the safety of workers, contractors, other parties and assets must be clearly documented and traced according to specific criteria and methods defined in specific procedures/operating instructions that include:

- roles, responsibilities and methods for verifying the necessary requirements such as existence, suitability, maintenance in good condition, efficiency of the prevention and protection measures adopted;
- methods for ensuring traceability of the delivery and verification activities regarding the functionality of the adopted prevention and protection measures.

Versalis and the Operating Units, using specific procedures/operating instructions, in alignment with Eni's regulations, define the terminology and classification for serious injuries, major incidents, significant incidents and near misses, as well as unsafe conditions/unsafe acts. For the investigation and analysis of the events that occur, they also define the roles, responsibilities and methods for:

- detection, recording, storage of records and traceability of activities performed, communication to relevant personnel and Eni HSEQ, monitoring of events and follow-up of actions taken using Eni's Incident and Injury Database (INDACO);
- analysis of significant incidental events using the Root Cause Analysis method and storage of analysis outcomes in the INDACO Database as defined in opi hse 105 ve.

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The company's QHSE Unit analyses and consolidates the investigation results. The findings from this analysis process contribute to any revisions/integrations of the Management System and to defining appropriate corrective and/or preventive actions. Following the implementation of corrective/preventive actions by the Operating Units, Versalis establishes an appropriate follow-up system to verify the effectiveness of the implemented corrective and/or preventive actions, in order to prevent the recurrence of the incidental event through INDACO.

The Operating Units ensure entry of data related to incidental events into the specific Eni Database (INDACO) to guarantee sharing data and experiences as well as fostering responsible and virtuous behaviour towards workplace safety within the world of Eni.The company's QHSE function issues quarterly reports on events that have occurred, including those outside the Versalis context, with descriptions of dynamics, effects and corrective actions.

Identification, Assessment and Mitigation of Risks

The identification of hazards, assessment and mitigation of risks (for Occupational and Process Safety of employees, contractors and the public, as well as the protection of the environment, health and asset integrity) is a continuous process that begins in the design and construction phase of facilities and ends with their decommissioning. This process also applies to products, considering their entire life cycle, including design, production, distribution, use and final disposal.

This process can be developed through the following steps:

- Hazard identification.
- Risk assessment.
- Action plan for risk elimination/reduction.
- Monitoring and review of risk analysis.

Hazard identification

In this phase, it is essential to identify all the hazards that the organisation must address. The elements of a safety programme that contribute to the identification of risks include:

- analysis of the major incidental events that have occurred in the past, both within and outside the company;
- dissemination of knowledge and exchange of information about risks associated with activities, also through HSE Committees, employing both a Top-Down and Bottom-Up approach;
- use of targeted checklists such as:
  - Lists of hazardous products and processes;
  - Lists of critical tasks;
  - List of critical equipment;
  - Maintenance/inspection reports;
- HAZOP – Hazard and Operability Study. A technique used to identify potential hazards and critical aspects of protection/prevention systems. This technique is applied for the identification of Top Events within the Safety Report framework for the purposes of Legislative Decree No. 105/15, as well as for the analysis of improvements and changes in installations/procedures;
- *FMECA – Failure Mode, Effects and Criticality Analysis*. A technique used to identify failure modes of specific components, their consequences and critical elements;
- Analysis of critical tasks. A method for describing operational modes and protection means to be used to prevent injuries and systematically monitor activities;
- *FTA – Fault Tree Analysis*. A method to reconstruct the sequence of events for determining root causes based on the loss scenario and establishing the frequency of occurrence;

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- *ETA – Event Tree Analysis*. A method that starts from the Top Event and identifies possible evolutions, determining various incident scenarios;
- Any other references from stakeholders;
- *Risk Based Inspection*;
- Classification of Areas and Explosion Protection Document;
- *HSE Due Diligence Analysis*;
- *HSE Assessment Analysis*;
- *SIL allocation, SIL Verification, SIL Optimisation, SIF Upgrade*;
- Model of Perception and Behaviour aimed at analysing risk perception and inappropriate behaviours of employees that may lead to events with potential implications on safety and that, in some sites, may result in a lack of development and/or deterioration of Safety Culture and Ethics;
- Management Of Change (MOC).

Risk assessment

Risk assessment is carried out through:

- *Severity*, which is evaluated based on the consequences associated with the analysed events;
- *Frequency* associated with the analysed events;
- *Combination of the frequency and severity* of the event to highlight the impacts on the safety and health of people, equipment and the environment.

Action plan for risk mitigation

The definition of the action plan for the elimination/reduction of risks stems from the risk identification and assessment analyses and takes into account the experiences gained and the trends in occupational and process safety performance indicators.

The action plan may include better regulation of activities through the revision and issuance of new procedures/operating instructions, as well as addressing the training needs of all personnel. It is particularly necessary for third-party companies to apply the same safety and environmental standards adopted by the company, so that they contribute, through the continuous professional development of their employees and careful management of their activities, to achieving the improvement objectives set by Versalis.

5.2.5.1.2 Process Safety and Asset Integrity Management

Process safety

The management of process safety involves the proactive identification, assessment, prevention and mitigation of risks related to releases of materials and energy, including major incidents, which could result from process malfunctions, equipment failures, or asset inadequacies.

Process safety aims to ensure the safe operation of assets throughout their lifecycle and involves:

- designing in accordance with applicable technical and safety standards, using appropriate risk identification methods during the design phase and defining preventive and mitigative measures consistent with the risk tolerance level defined by legislation and company standards;
- implementing in accordance with design requirements and those identified during risk analyses conducted in the design phase;
- commissioning plants in accordance with commissioning and start-up procedures;

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- operating in accordance with adequate and up-to-date technical and operational documentation, understanding technological processes and their associated risks, using appropriate human and managerial resources and continuously monitoring the safe operating conditions of assets;
- maintenance in accordance with technical and managerial best practices related to technology, maintenance and inspections;
- managing plant engineering, technological and organisational changes subject to proper risk identification and management;
- decommissioning unused assets in accordance with appropriate residual risk management methods.

The regulatory framework for process safety management is outlined in Annex S_C to MSG HSE "Process Safety Management System".

The Employer, in line with the definitions provided by the company's QHSE function and Eni's HSEQ function, ensures the above activities are carried out and documents activities related to process safety management.

Asset integrity

Employers define appropriate methods for asset management, verifying their integrity and adequacy to ensure effective management concerning HSE aspects. In addition to ensuring their integrity to protect asset value, asset management is fully part of actions safeguarding health, environmental respect and worker safety, being fundamental for public safety and sustainability.

In accordance with the Procedure pro ope 003 ve "Asset Integrity" and the Professional Operating Instruction opi ope 003 ve "Identification of Integrity of Critical Elements" which provide for:

- ensuring asset management with operational methods in line with international standards and best practices;
- developing and maintaining updated lists of assets by identifying potential HSE critical elements;
- planning, conducting and verifying inspection and maintenance activities through qualified and suitable personnel;
- conducting periodic checks of asset adequacy and integrity and compliance with applicable regulatory requirements through qualified personnel;

the LD/SC ensure:

- the operational control of their activities and the integrity of their assets in compliance with the HSE Policy, objectives and targets defined;
- compliance with the defined conditions of activities associated with identified HSE aspects.

Additionally, the LD/SC define operational methods and criteria at least for asset management in all its phases,

including:

- design, implementation, commissioning, operation, inspection, maintenance and decommissioning;
- procurement of goods and services;
- qualifying control of people accessing their facilities (contractors, suppliers, visitors, etc.).

To achieve high HSE performance standards, in line with the best international levels and available technologies, the company's QHSE Unit supports the LD/SC in preparing best practices in HSE asset management.

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5.2.5.1.3 Product Safety Management (Product Stewardship)

Versalis aims to ensure that health, safety and the environment are preserved throughout the entire lifecycle of its products. Versalis considers the risks associated with the production, importation, market placement, purchase and use of substances/mixtures across the entire supply chain (value chain), establishing obligations and responsibilities for various company roles in accordance with relevant regulations.

Product Safety in Versalis Subsidiaries

Versalis, like its foreign subsidiaries, is identified as a "legal entity" for the purposes of applicable Product Safety regulations. They are therefore responsible, independently and directly, for managing the following aspects:

- compliance with applicable regulations:
  - classification, labelling and preparation of Safety Data Sheets (SDS) in relation to REACH and CLP Regulations, and other applicable documentation concerning the country of production/marketing,
  - other national and EU regulations;
- proper management of all chemical agents and the archiving of related technical documentation for regulatory and inspection purposes;
- communication of information regarding the safe use of substances/mixtures placed on the market along the supply chain (workers, distributors, clients, etc.) to make it accessible to all stakeholders.

The company procedure pro hse 007 versalis "Management of Substances Subject to REACH Regulation" serves as the regulatory reference document, defining roles and responsibilities for:

- identification of applicable EU/non-EU regulations and related obligations;
- inventory, identification and classification of produced substances/mixtures;
- fulfilment of all obligations required by applicable regulations;
- preparation of the Safety Data Sheet (SDS or equivalent document for non-EU countries) and label, also concerning the country where the substance/mixture will be marketed.

The company's QHSE unit plays a guiding, coordinating and controlling role for Eni SpA on compliance issues related to Product Safety and provides support/liaison (as needed) with other legal entities/subsidiaries.

Product Safety at Versalis SpA

Within the legal entity of Versalis, the "REACH Teams" have been established, comprising representatives from various company units (business units, Supply Chain, R&D, Industrial, International Development, and Licensing) whose expertise / knowledge enable monitoring produced/imported substances of corporate interest throughout their lifecycle.

The company's QHSE unit, for the Versalis Legal Entity, manages Product Safety aspects through:

- proper management of chemical agents by coordinating the inventory of chemical agents (strategic raw materials, chemicals, auxiliary and technical materials) handled by the LD/SC;
- compliance with requirements for the R&D of new products and/or chemical production processes;
- monitoring the regulatory compliance status (both European-EU and non-European-EXTRA EU) of purchased (imported and non-imported) products and products for resale;

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- implementation of the obligations of national regulations (Authorisations within the sphere of "Medical-Surgical Products"), EU regulations (REACH, PIC, BPR, National Inventories) for the production, importation and marketing of products of corporate interest;
- compliance with EXTRA EU regulations (REACH-like) for the marketing of products of corporate interest in different geographical areas;
- defining hazard classification and labelling according to relevant regulatory references where the chemical agent is handled and/or marketed (GHS, CLP);
- drafting SDS and eSDS for chemicals placed on the market and making available, for all stakeholders (e.g., workers), the SDS and eSDS of purchased chemical products, thus ensuring appropriate communication of their safe use throughout the supply chain;
- archiving documentation supporting the regulatory compliance of chemicals of corporate interest as prescribed by current law and supporting inspection events;
- identifying chemical agents belonging to the lists of concern indicated by the Authority (SVHC) present at sites and promoting substitution activities;
- communicating with internal and external stakeholders regarding Application Regulations (e.g., Food contact, RoHS, Toys, Automotive, Minerals Conflict, etc.) of Versalis Products;

- internal training and information on Product Safety topics;
- engaging with Authorities and managing inspections.

The company's QHSE unit, in collaboration with Employers, undertakes to:

- identify the health, safety and environmental hazards of all substances/mixtures of interest;
- provide workers with information for the correct management of the substances/mixtures used;
- coordinate activities related to reducing current and potential risks associated with the supply, production, distribution and use of products, as well as the disposal of associated waste;
- prepare and update the documentation required by regulations (safety data sheets) and verify the accuracy of what is declared by employers.

In relation to the product lifecycle, the headquarters' QHSE unit contributes to Product Stewardship by overseeing all regulatory aspects of products related to HSE topics.

This role is carried out in detail as follows.

Design and Development Phase

The QHSE unit, taking into account current regulatory aspects and their developments, highlights the mandatory requirements that must be met when promoting and developing new products and/or modifying existing processes/products.

At the same time, it applies the principle of greater sustainability by directing changes towards the development of products with a lower HSE impact throughout their lifecycle and promoting the substitution of substances that are highly concerning for human health and the environment.

Additionally, in compliance with REACH and/or REACH-like regulations, it ensures the submission of correct registration profiles for substances in line with the research and/or development context in which they are produced (simplified registrations known by the English acronym PPORD, which stands for Products and/or Processes of Research and Development).

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Procurement

The headquarters QHSE unit ensures that purchased chemical agents are evaluated for their level of regulatory compliance, specifically:

- verifying whether they have been registered/authorised for the company's intended use according to the REACH Regulation and/or REACH-like regulations (in the case of imports from outside the EU);
- checking the correct issuance of the relevant SDS or eSDS in accordance with the applicable regulatory requirements;
- supporting the procurement function in defining contractual clauses regarding regulatory obligations in the field of Product Safety.

Furthermore, for Versalis to issue statements regarding the application of use to its clients, it must ensure that its supplies are compatible with such statements. To this end, the headquarters QHSE unit promotes criteria for evaluating suppliers and their Due Diligence with the relevant Eni functions (Vendor Management and Compliance).

Production

In the realm of Product Safety, the company's QHSE unit ensures compliance with the production, importation and use of substances of corporate interest in production processes through:

- registration of chemicals produced in accordance with REACH Regulations;
- registration of imported chemical agents in line with the regulations of the geographical area of importation (REACH in the EU, REACH-like outside the EU);
- monitoring imported products to ensure correct compliance with regulations;
- updating Registration dossiers in line with changes in production processes and/or variations in the chemical profiles of synthesised/imported products;
- a dedicated working group for identification in terms of Product Safety regulations ("GdL Identification") ensures the correct definition of the chemical profile according to the required regulatory standards;
- dissemination of information regarding permitted uses (i.e., those safe for humans and the environment during production phases).

Placing on the market

The company's QHSE unit ensures the correct communication regarding safe use throughout the supply chain by preparing SDS, extended SDS, or Declarations of Non-Hazardousness (DNP) and making them available:

- internally to its workers;
- externally to its clients;

on the occasion of each new or updated publication.

Information and training

The company's QHSE unit issues notices regarding:

- the presence of substances (either as such or as components of mixtures) at sites/plants identified by the Authority as particularly concerning (SVHC), informing about ongoing or finalised follow-ups by the Authority (such as authorisation, restriction, or reclassification);
- regulatory updates of interest to the LD;
- portfolio of registered substances;
- portfolio of imported substances.

It also promotes training activities at the LD on Product Safety in conjunction with regulatory changes impacting workers and/or production processes.

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Other phases of the lifecycle

The company's QHSE unit ensures that the LD have access to SDS and extended SDS (for both produced and purchased chemicals), guaranteeing the availability of preliminary information necessary for the correct management, in terms of HSE impact, of chemical products in all the remaining phases of their lifecycle.

5.2.5.1.4 Industrial Hygiene and Health Management

Industrial Hygiene

Industrial hygiene activities are aimed at identifying, assessing and controlling chemical, physical and biological risk factors arising from work activities that can affect the safety, health and well-being of workers and the surrounding population.

The outcomes of industrial hygiene activities are an integral part of the hazard identification and risk and opportunity assessment process and are essential for defining appropriate prevention and protection measures. These activities lead to the definition of a continuously updated improvement plan, which also considers changes in company plants and processes, including work organisation and the definition of appropriate organisational and collective protection measures at the source of the risk, as well as personal protection measures, including personal protective equipment, when exposure risk cannot be prevented by any other means.

The HSE function of Eni defines the guidelines for the industrial hygiene process within the broader framework of the HSE risk assessment process.

The Health function, within the industrial hygiene process and in relation to the broader health risk assessment process, contributes to defining guidelines, particularly concerning exposure to health-affecting factors.

Operational industrial hygiene activities are carried out through the following actions, organised by the employer with contributions from all involved LD functions, each responsible for their part in the industrial hygiene process:

- collecting information on the process and work organisation;
- identifying and examining risk factors (hazards) for health and safety in the workplace, including their potential impact on the external environment, which may arise from processes, operations, machinery and equipment, considering different work conditions and situations;
- identifying organisational work factors and homogeneous groups of workers with the same exposure profile;
- planning, scheduling and conducting environmental measurements and workplace investigations; assessing exposure risks to the risk factors in workplaces and living environments, including their interactions;
- identifying and proposing potential interventions for risk reduction and mitigation.

The employer ensures that activities are documented, adequately archived and made accessible in order to conduct risk assessments, define and implement monitoring activities, and identify and adopt appropriate risk mitigation and reduction measures.

Industrial Hygiene activities, aimed at identifying and assessing exposure risks, are planned and implemented according to specific qualitative and quantitative investigation strategies defined in the guidelines and standards, which refer to specific regulatory tools that also govern the related operational methods.

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Health Management

Operating Units, in pursuing the strategic directions and objectives outlined in the HSE and Health Management System and implementing what has been independently defined, base health protection on criteria of prevention, protection, promotion, information and participation. They aim to ensure the health of employees and suppliers engaged in the Operating Units and to promote appropriate actions to safeguard the well-being of the local communities in which they operate.

The elements they are based on include:

- the process of continuous improvement in the efficiency and reliability of facilities;
- the adoption of best practices and operational management inspired by advanced health and environmental protection criteria, both outside and within industrial activities;
- research and technological innovation, with specific reference to research on health-related issues, worker and community exposure and occupational risks;
- the results of auditing activities and the continuous improvement process;
- the definition and periodic monitoring of key indicators and areas for analysis and intervention;
- periodic reporting on the health status of employees and exposure to risk factors;
- certification programmes for management systems (ISO) for the Operating Units and their maintenance;
- involvement of personnel at all levels;
- the definition and development of programmes related to the themes of sustainability.

The Health Management System is structured into sub-processes, summarised as follows:

- ***occupational medicine***: this discipline aims to prevent, diagnose and treat diseases caused by work activities. It represents the set of medical acts, aimed at protecting the health and safety of workers, in relation to the work environment, occupational risk factors and the manner in which the work is carried out;
- ***healthcare***: this involves actions, services and practices conducted under normal, non-emergency conditions for the prevention, diagnosis, treatment and management of acute and chronic illnesses. Healthcare can be provided by specialist and non-specialist medical personnel, in outpatient and/or hospital settings, with or without the support of non-medical health personnel;
- ***travel medicine:*** this includes activities for preventing and mitigating health risks for individuals in the case of:
  - overseas travel undertaken by employees on behalf of their respective LD. This includes all activities related to the journey, stay in the destination country and return to the home country;
  - an employee signing a new contract for work abroad, covering preliminary activities up to arrival;
- ***health promotion: this*** involves implementing programmes, activities and voluntary interventions within a framework of corporate welfare and social responsibility, with the primary aim of maximising workers' physical and mental well-being. This enhances their ability to balance professional commitments with personal and emotional needs, benefiting company productivity and overall social organisation;
- ***management of healthcare facilities:*** this includes:
  - guidelines for the operational management of self-managed healthcare facilities;
  - tasks, roles, responsibilities and information flow for managing and periodically monitoring compliance with the technical, construction and management requirements of healthcare facilities;

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- ***community health:*** this refers to initiatives aimed at maintaining, protecting, and/or improving the state of health of communities, as a contribution by Versalis to the sustainable socio-economic development of the host country.

  In particular, this is pursued by improving hygienic-sanitary conditions, access to and optimal use of adequate healthcare services and ensuring compliance with public health standards. The beneficiaries of this process include:

  - populations residing in areas adjacent to industrial sites;
  - populations outside industrial areas, defined as beneficiaries through agreements with partner countries.

  The Employer, through the LD health function, must promptly communicate to the company's QHSE unit any requests from local authorities regarding the need to implement a community health project, or the state of a humanitarian emergency and any requests from Local Authorities in the case of natural or man-made catastrophic events.

For employee health, employers prioritise risk prevention, also considering possible integrations and synergies between health, safety and environmental areas. They manage health through the following main phases:

- identifying hazards and assessing associated risks to employee health, considering the nature and type of operational activity;
- conducting investigations to measure chemical, physical and biological risk agents:
- evaluating workers' exposure to risk agents from operational activities, such as chemical, physical and biological risks, manual handling of loads, work at display screens, driving vehicles, etc.;
- collecting results of occupational exposure assessments, processing and recording them by job role in the Unit's Environmental Data Register to support health surveillance activities. The outcomes form the basis for the documentation required by current regulations (attached to the risk file and Register of Carcinogen Exposures);
- the Company Doctor conducts preventive and periodic health surveillance targeted at risks, as specified by health protocols, and any additional examinations deemed necessary by the Competent Doctor to formulate a judgement of fitness;
- the Company Doctor records the results of individual workers' health checks in the Health and Risk Records;
- collecting health surveillance results (medical examinations and supplementary clinical and instrumental health checks) and compiling the Unit's Biostatistical Data Register by job role, anonymously and collectively;
- implementing the most suitable risk prevention and protection measures to reduce and/or eliminate risks, prioritising collective measures;
- adopting emergency and first aid procedures compatible with the general emergency plan, systematically updated and subject to periodic drills, addressing scenarios such as:
  a) health emergencies, which are sudden and unpredictable events (traumatic, acute illness, infectious disease, etc.) that may endanger one or more lives and require a rapid and coordinated response.
  b) chemical emergencies, effectively managing and optimising the use of possible toxicological antidotes to ensure their availability across all operating units;
- defining appropriate training processes and suitable methods for sharing information with all roles involved in the prevention process;

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- promoting initiatives to support employee health prevention concerning common general population diseases not related to work activities, by adopting workplace wellness programmes and healthy lifestyle practices;
- defining adequate and periodic site auditing processes to verify compliance with the norms and requirements of the current Management System;
- identifying any health-related issues;
- updating, monitoring and analysing work-related illnesses;
- promoting initiatives to support the prevention and protection of employee and local community health
- analysing the health/hygiene/infectious context in the geographical area where company activities are conducted;
- adopting ergonomic principles in the design of work environments, the selection of workstations and machinery, and the definition of work methods.

The outcomes of hazard identification and risk assessment activities, as well as the understanding of exposures and health surveillance results, are essential for defining appropriate prevention and protection measures to mitigate risks and safeguard the health of workers and all parties involved in company activities, prioritising collective measures. These efforts result in the development of an improvement plan that considers changes in company plants and processes, including work organisation. Employers ensure that documents containing the results of workplace/exposure investigations are recorded, adequately archived and made accessible to enable monitoring and assessment of exposure to risk agents. This assessment is complemented by the activities and outcomes of health surveillance. They also establish an appropriate follow-up system to verify the effectiveness of implemented corrective and/or preventive actions. Through an analysis of the territorial context and environmental conditions, employers ensure the conduct of a Health Impact Assessment (HIA) for all significant new projects or substantial modifications to existing ones in countries where no relevant applicable regulations are in place. This activity is always carried out in accordance with the principles expressed in Eni's policies to protect workers and local communities.

Employers ensure training and information for each employee regarding:

- health risks associated with their tasks;
- emergency plans, first aid procedures for safeguarding individuals;
- promotion of internal communication on relevant topics using the most suitable channels (intranet/internet site, information reports, monographs on specific topics, etc.).

The company's QHSE unit ensures a control system over employers' activities, defining the methods for tracing health-related issues and ensuring reporting on the performance of the Operating Units.

Moreover, the QHSE unit ensures the implementation of reference standards through contextual and environmental analyses for conducting HIA on all new projects or modifications of existing ones in countries where no applicable regulations exist, in line with Eni's policies to protect workers and local communities.

The QHSE unit analyses the aggregated results of investigations conducted by Employers to protect health in the workplace to identify any cross-cutting applicable elements. These analyses contribute to any revisions/integrations of the management system. They also support relevant company functions by providing technical advice in all phases of supplier management, including defining contractual clauses related to procurement where necessary. Specifically, they identify requirements (internal and external regulations, technical requirements, etc.) in relation to:

- services provided by analytical laboratories that conduct environmental sampling and analysis and chemical-clinical/toxicological analysis;
- occupational medicine, first aid and emergency medical services, as well as specialist/instrumental activities.

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The company's QHSE unit periodically reviews data related to monitoring and updates on health status and, based on these results, undertakes any necessary revisions/integrations of the Management System and defines appropriate corrective and improvement actions.

In agreement with the HR Business Partner function and the relevant Eni function for health promotion, the company's QHSE unit defines specific promotion programmes aimed at improving health protection and the working and living conditions of employees, considering the three established phases of prevention:

- primary prevention aimed at promoting healthy lifestyles to prevent the onset of cardiovascular, metabolic diseases, and some cancers;
- secondary prevention (or early diagnosis programmes) to detect diseases at an early stage that, if diagnosed early, can be successfully treated, leading to complete recovery;
- tertiary prevention aimed at preventing the recurrence of pathological events in individuals who have already undergone therapeutic and/or rehabilitative interventions, as well as facilitating their reintegration into the work environment.

The choice of a specific health promotion initiative is guided by company needs and/or local community requirements. Participation in health promotion programmes is voluntary. This activity is always in line with other regulatory guidelines on the subject in effect at Eni.

The company's QHSE unit, in concert with the HR Business Partner function and the relevant Eni function for health promotion, evaluates the effectiveness of promotion programmes not only through customer satisfaction data, which is necessary to assess the quality of the service offered, but also through the results of KPIs associated with the programmes. The storage and use of collected information for statistical purposes are always managed in accordance with applicable legal provisions.

5.2.5.1.5 Environmental Management

The objective of environmental management at Versalis is to:

- identify environmental aspects, their impacts and associated risks/opportunities;
- mitigate impacts/risks to the environment and the organisation related to significant environmental aspects;
- prevent adverse and/or illegal environmental events, both direct and indirect ones, related to the specific activities of production units/organisational structures associated with employers, as well as those related to various processes of product and service design, development, use and end-of-life, considering all lifecycle stages and following circular economy principles where possible.

Employers define the methods for managing significant environmental impacts/risks, with particular reference to compliance obligations and the vulnerability of the environmental context of reference.

Operational management of environmental impacts/risks, with reference to specific company procedures and professional operating instructions, covers at least the following aspects:

- control and monitoring of wastewater discharge points;
- control and monitoring of atmospheric emission points;
- prevention and monitoring of fugitive emissions;
- prevention and monitoring of odorous emissions;

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- prevention and monitoring of noise emissions in the environment;
- treatment of exceedances of authorised limit values;
- management of greenhouse gas emissions;
- prevention and monitoring of spills;
- waste management (identification, characterisation, classification, temporary storage, collection/transport, disposal/recovery in internal facilities, delivery to external facilities);
- soil and surface/groundwater contamination and related emergency safety and remediation actions;
- equipment containing ozone-depleting substances;
- consumption of natural resources (water, energy, raw materials, etc.); due diligence activities in acquisitions and asset management.

The outcomes of evaluations conducted to identify environmental aspects and their impacts/risks allow identifying prevention, protection and mitigation measures to protect the environment and safeguard biodiversity. These measures must be robust, suitable, well-maintained, efficient and periodically verified and updated if necessary.

Employers ensure that activities related to managing prevention and protection measures to safeguard the environment and prevent impacts on the environment and biodiversity are documented and tracked according to specific criteria and methods defined in specifically prepared HSE regulatory tools.

The company's QHSE unit and Operating Units collect and analyse data related to the monitoring of environmental aspects and use the results regarding performance trends to make any necessary revisions/integrations to the Management System and to define appropriate corrective and/or preventive actions.

5.2.5.1.6 Energy efficiency and renewable sources

The ongoing objective of operating according to energy efficiency criteria, including the use of renewable sources, is implemented through:

- identifying and studying processes and plants that meet the most advanced industrial standards;
- verifying and validating aspects related to energy efficiency management during the design phase of new products, plants and the company’s activities in general;
- identifying and applying energy conservation technologies and emission reduction methods;
- managing existing assets with operational methods in line with international best practices;
- R&D activities for both improvement and innovation.

Activities related to energy efficiency management are allocated within the Industrial Directorate.

5.2.5.1.7 Research and Development in HSE/SLT

Versalis's policy and guidelines in HSE/SLT require directing research and technological innovation towards promoting products, processes and methodologies that are increasingly environmentally compatible and aimed at reducing health and safety risks for employees, contractors, customers and the community. This is achieved also through active participation in technical-scientific forums and business associations.

The HSE/SLT aspects related to research and technological innovation activities developed by Versalis's Research, Development and Technological Innovation Function aim to:

- develop products, processes and plants that are increasingly environmentally compatible and aimed at reducing health and safety risks for employees, contractors, customers and the Community;
- operate consistently according to energy efficiency criteria, also by using renewable sources.

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The areas of focus for HSE/SLT in Versalis's research, development and technological innovation activities include:

- identifying and studying processes and plants that meet the most advanced industrial standards;
- verification and validation of the design phase;
- managing existing assets with operational methods in line with international best practices;
- conducting research and development activities for both improvement and innovation;
- identifying and applying technologies for:
  - energy conservation, energy efficiency and the use of renewable sources;
  - reducing atmospheric emissions;
  - reducing water discharges;
  - reducing the production of residues and waste;
- reusing and recycling residues and waste;
- saving in the use of raw materials and natural resources;
- improving the environmental characteristics of products;
- ensuring, in collaboration with relevant company functions, contributions for the development of initiatives related to the circular economy, coordinating related research and development projects for the recycling of plastics and rubber and for the eco-design of products.

HSE/SLT needs, both for improvement and innovation, originating from activities conducted at LD/SC or from benchmarking activities, are received by the competent structures and incorporated into the relevant activity plans, optimising possible synergies.

5.2.5.2 Managing the change

When temporary or permanent changes occur, the Employer ensures their adequate assessment and management, particularly concerning the impacts these changes have or may generate on HSE/SLT aspects.

These changes may relate to:

- new products, services, or processes, or modifications to existing products, services and processes concerning:
  - workplaces and surrounding areas;
  - work organisation;
  - working conditions;
  - equipment and systems;
  - workers;
- legal requirements and other compliance obligations;
- the development of knowledge and technologies;
- the planned changes and any consequences.

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The design and management of changes include:

- identifying roles and assigning appropriate responsibilities;
- methods for involving relevant and specialist personnel;
- identifying the method for conducting risk assessments;
- preventive evaluation of HSE/SLT risks and opportunities and identifying any prevention and protection measures;
- traceability and documentation of the evaluation processes conducted, as well as the methods adopted and the implementation of protection and prevention measures;
- any necessary revision of the relevant documentation;
- training and informing personnel.

Regarding development projects, Versalis ensures that the activities of designing, evaluating, reviewing and implementing new assets are carried out considering HSE/SLT principles, regulations and guidelines. This approach allows for pre-selection of the most suitable technical and design solutions to reduce HSE/SLT impacts or risks associated with the implementation and operation of new processes, systems, equipment, etc. to a level considered reasonably practicable in a proper cost-benefit relationship (ALARP - As Low As Reasonably Practicable).

Implementing change involves adopting a structured process to pre-evaluate and mitigate possible HSE/SLT impacts or risks associated with planned changes to existing:

- processes;
- systems/equipment;
- organisation;
- work methods and/or procedures/operating instructions.

The identification, implementation, and follow-up of recommendations from this activity ensure, in project management:

- control of HSE/SLT aspects before the project's implementation;
- reduction of the need for corrective actions after its implementation.

The Operational Unit's QHSE unit provides the Employer with specialist support in assessing HSE/SLT risks or impacts related to:

- new projects;
- changes to existing set-ups.

To achieve a high standard of HSE/SLT performance, aligned with the best international levels, the company's QHSE function, in anticipation of technical changes, prepares engineering best practices in HSE/SLT that consider the best available technologies, such as HAZOP analysis, SIL allocation analysis, ATEX analysis, major accident risk analysis, etc.

The process of verifying and validating HSE/SLT aspects during the design and change management phases is described in the professional operating instruction opi hse 116 ve 'QHSE Analysis in the Change Management Process' and pro hse 014 'QHSE Analysis in the Change Management Process with Organisational Impacts'.

In short, the design and management of system changes include:

- assigning appropriate responsibilities;
- a preliminary assessment of HSE/SLT risks;
- involving relevant and specialist personnel;

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- traceability of the documentation of the evaluation processes conducted, as well as the methods employed;
    - identifying any need for revising the HSE/SLT documentation;
    - training and information for personnel.

In the case of asset acquisition and/or disposal operations, the competent business unit functions ensure the definition of roles and responsibilities for HSE/SLT impact assessment activities, in accordance with the specific regulatory guidance tools as per opi hse 165 ve “Standard of Due Diligence in QHSE and Asset Integrity”. In particular, Versalis's QHSE function, in alignment with Eni's regulatory and/or organisational tools, ensures that the methods and criteria for identifying and evaluating potential HSE/SLT and Asset Integrity issues associated with the asset are met during acquisition and/or disposal operations (due diligence on HSE/SLT and Asset Integrity aspects). These tools ensure the involvement of the competent function, the definition of criteria for assessing compliance with HSE/SLT and Asset Integrity regulations of the asset being bought or sold, taking into account the level of available information (and, for acquisitions, any limitations imposed by the seller) and the identification of any necessary activities to prevent or mitigate potential HSE/SLT and Asset Integrity issues associated with the asset being transacted.

5.2.5.3 Procurement

The procurement process for goods and services with a significant impact on HSE and Health aspects is defined in the relevant company regulations:

- MSG Procurement (with sub-processes for procurement planning, contract preparation and awarding, and post-award contract management);
- MSG Anti-Corruption;
- MSG Abuse of Market Information (Issuers);
- MSG Transactions with interests of directors and statutory auditors and Transactions with Related parties.

The HSE/SLT management of suppliers involves correct management of the entire supply chain, focusing on the HSE and Health aspects of each phase of the process. To this end, in line with business requirements, balanced and increasing requirements and controls are contemplated within the process (supplier management chain), starting from those with a general nature in the initial qualification phase to specific and detailed requirements during the performance of a contract. Versalis is also committed to transferring its HSE/SLT culture to its suppliers (and subcontractors), also through targeted initiatives and field support.

Eni's HSEQ and Health functions, with the support of procurement functions and relevant technical units, identify critical commodity categories from an HSE risk perspective, supplier qualification HSE criteria, as well as criteria for managing supply contracts for goods, services and works, ensuring the necessary elements for conducting procurement activities concerning HSE/SLT aspects.

In the supplier classification/qualification process, regarding HSE and Health aspects, the competent procurement functions, referring to the relevant commodity categories, engage the relevant function within the sphere of HSE for HSE evaluations and within the sphere of SLT for Health evaluations.

This evaluation phase serves as an initial check on the supplier's suitability, considering subsequent HSE/SLT control and evaluation steps if the supplier is activated.

Eni's HSE and Health function, the company's QHSE unit, and the QHSE units of LD/SC support the Procurement function in preparing HSE/SLT contractual clauses to be applied in negotiations with suppliers and/or competent functions in negotiating and signing contracts with third parties holding rights to company assets.

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In defining the contractual strategy and during the management of bids, the QHSE Units of LD/SC provide support to the applying units in preparing the purchase request (RDA) and during the technical evaluation phase of bids concerning HSE/SLT aspects, particularly regarding environmental, safety and energy performance.

Versalis's commitment to safeguarding health, safety and the environment is also reflected in managing the procurement process for goods, services and works, considering the HSE/SLT aspects of the activities performed by suppliers and contractors.

In alignment with Eni's Policies, the management of HSE/SLT aspects for contractors and suppliers begins at the qualification phase.

To this end, Eni's HSEQ function, as outlined in specific qualification procedures, provides the necessary specialist support to Eni's Procurement Functions for the document-based verification of HSE/SLT requirements for suppliers and contractors through evaluations related to:

- the adoption of HSE/SLT Management Systems and their certification according to recognised international standards;
- verification of the HSE/SLT technical-professional requirements of contractors based on the goods/services being supplied, as well as verification of general and moral requirements;
- compliance with purchase specifications and the use of the best available technologies in the sphere of HSE/SLT;
- the outcome of any audits conducted at suppliers/contractors, carried out in collaboration with Eni's Procurement Departments; based on the criticality of the commodity group assigned to the supplier and other classification criteria, the type of QHSE analysis to be conducted on the supplier is determined during the qualification phase; a report is produced and corrective actions are requested from the supplier, which are monitored until completion (HSE follow-up);
- the HSE performance of the contractor/supplier within the contracted activity and, in particular, in cases of HSE non-compliance, feedback is provided on HSE violations/infractions with consequent actions taken against the supplier, coordinated by the company's QHSE unit.

Depending on the criticality formally assigned to each supply of goods, works and services or their commodity classes, the level of actions required for supplier pre-qualification/qualification may vary, and specific checks at suppliers and contractors, including subcontractors, may be arranged to verify the requested information.

While maintaining the requirement for full and unconditional compliance with applicable legal regulations for supplier and contractor activities, the General Conditions, Special Conditions and Standard Contracts must include specific clauses specifying:

- material requirements;
- commitment to comply with applicable HSE/SLT regulations, procedures/operating instructions, Eni's Policies and Versalis's HSE/SLT Policy;
- methods for executing the activities covered by the contract/supply;;
- costs associated with interferences between multiple parties;
- the requested HSE/SLT requirements, which refer to the HSE/SLT Policy and the requirements of the HSE/SLT Management System.

Contracts must not only include all required HSE/SLT requirements but also specify how contract managers will verify compliance with these requirements and manage any non-conformities identified.

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Where applicable, suppliers of goods, works and services are required to commit to aligning with Eni's MSG HSE and MSG SLT by:

- explicitly declaring their awareness of the risks associated with the activities required under contracts with Versalis;
- reporting HSE/SLT data related to activities performed on behalf of the division and according to the methods it requires, with particular emphasis on the detection and management of accidents and injuries.

Versalis contract managers ensure oversight of supplier and contractor activities, verifying compliance with the HSE/SLT requirements specified in contracts and applicable national HSE/SLT regulations, as well as the operating instructions of the LD/SC. This enables them to promptly report any anomalies, develop appropriate corrective or preventive actions and make judgements on the reconfirmation of their qualification.

With the support of procurement functions and other relevant company functions, Versalis identifies a disciplinary regime for behaviours of suppliers/contractors/subcontractors that violate HSE/SLT standards.

Directly and indirectly controlled companies, both Italian and foreign, under Versalis, and LD/SC adopt appropriate procedures/operating instructions aimed at sharing information with contractors about environmental impacts or HS and Health risks generated by activities conducted at LD/SC. This promotes cooperation and coordination between their activities and those contracted out, to minimise interferences and jointly identify applicable mitigation measures.

Coordination and oversight of HSE/SLT issues related to outsourced activities are ensured within the HSE/SLT management systems, according to the requirements at the sites or LD/SC where third-party activities are to be performed.

The Employer, through their organisational structure and particularly the contract manager, ensures the preparation of execution feedback for HSE/SLT aspects for contracts where performance feedback is required by procurement functions, and in cases of serious non-compliance and violations detected (according to the responsibilities and methods defined in the relevant regulatory tools).

The evaluation of contractors' HSE/SLT performance at the end of activities contributes to the reconfirmation of their qualification by Eni's Procurement Management.

The review of the effectiveness of HSE/SLT requirements included in contracts is used as input for improving the supplier and contractor management process.

5.2.5.4 Preparation and response to emergencies

Emergencies are situations where the undesired consequences in terms of impacts on safety, health, the environment, public safety, as well as on company and/or third-party assets and the image of Eni and Versalis may persist or worsen without decisive interventions.

In line with the general guidelines defined by Eni's HSEQ function, the LD/SC plan interventions to be implemented in case of emergency to minimise the negative consequences of related events, respecting the health of the population and the external environment, in accordance with specific procedures/operating instructions that identify the necessary actions and the individuals in charge of their implementation.

It is ensured that personnel tasked with implementing emergency measures have the necessary skills and sufficient training to adequately perform tasks related to emergency management and are formally identified and appointed.

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Emergency management is carried out through the following main phases:

- identification and assessment of possible incident scenarios and effects;
- definition of actions to mitigate impacts associated with credible incident scenarios;
- crisis and emergency management;
- drills and follow-up.

The LD/SC develop multiple response plans for possible HSE/SLT emergencies identified as credible, including toxicological and health emergencies. These plans include at least:

- identification of possible emergency scenarios related to the LD/SC;
- risk assessment associated with these incident scenarios and effects, both internal and external to the LD/SC under Versalis's responsibility;
- identification of individuals involved in emergency response, including those responsible for implementing fire prevention measures, evacuating workers in the event of any serious and immediate danger, and providing first aid, along with their tasks, responsibilities, authority and duties, as well as the relevant intervention methods;
- definition of roles, responsibilities and methods for controlling risk situations to manage and contain events to minimise their effects;
- identification of communication and reporting methods, both internal and external, to ensure timely information transfer about the event and subsequent developments (reporting may be structured in multiple stages);
- preparation of adequate Response Plans and protective measures, defining actions that all personnel must take in case of emergency;
- consideration of potential impacts on neighbouring areas when outlining emergency and response scenarios and, consequently, defining measures to prevent health risks to the public and environmental degradation;
- definition of communication and coordination methods with external agencies, Eni's HSEQ function, and other Versalis/Eni functions;
- definition of procedures for leaving the workplace in cases of serious and immediate danger;
- post-event management methods (return to the workplace, resumption of activities);
- definition of methods and timing/frequency for conducting emergency drills;
- periodic updating of emergency scenarios and response plans based on experience from past events, emergency drill results, organisational/operational changes, legislative updates, technological innovations and new knowledge regarding emergency measures.

Each Operational Unit has an internal Emergency Plan that identifies responsibilities and actions to be taken in case of emergency. The internal emergency plan is integrated with the Department emergency plans.

Emergencies can have different levels of severity as defined by opi hse 105 ve, opi hse 159 ve and opi hse 187.

Events associated with emergencies are recorded in INDACO and notified to the relevant company functions and Eni's HSEQ

The purpose of reporting is to provide timely information to higher management levels, but it does not imply a transfer of responsibility; it can be structured in multiple stages as more information about the event becomes available.

To maintain a high level of emergency response preparedness, in addition to continuous training of involved personnel, periodic drills are conducted based on the simulation of Top Events, taking into account the associated damage areas.

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It is also advisable to conduct at least one site emergency simulation annually, involving external authorities and third-party companies.

Each drill is followed by a debriefing/analysis meeting, involving on-duty operational staff.

Emergency Plans that may require the intervention of public rescue forces are shared with them to pre-establish the organisation of interventions, also through joint simulations and exercises.

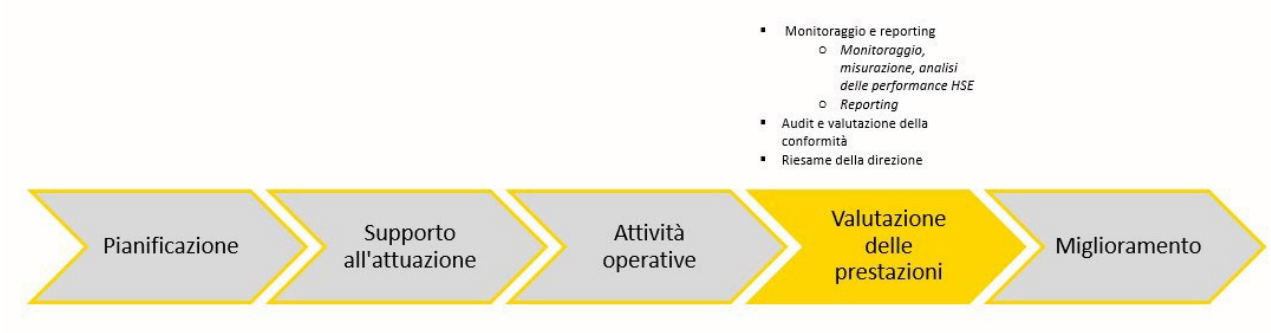
Any issues that arise during these activities provide useful insights for potential revisions/integrations of the HSE/SLT Management System and help define appropriate corrective or improvement actions/interventions aimed at maintaining a high level of emergency preparedness.

According to MSG SLT, each employer line, through the medical emergency officer or equivalent role, prepares an updated and documented “Medical Emergency Response Plan (MERP)”, a process regulated by opi hse 187 ve. This plan considers all implications regarding medical assistance and emergency, as well as the management of health crises and pandemics.

Level 1 and 2 medical emergency scenarios are addressed within site emergency plans.

Considering that level 3 emergencies may occur for Employer Line personnel when travelling to countries where there are SC/LD, in the event of a medical emergency, the MERP prepared by the host companies apply, also for MEDEVAC (the acronym for MEDical EVACuation activities), implemented to prevent the risk of death or reduce the severity of harm that could result from illness or injury, particularly when the risk to life is high.

5.2.6 Performance evaluation



The phase known as “HSE/SLT Performance Evaluation” consists of the following sub-processes:

- ***monitoring and reporting***, this aims to measure HSE/SLT performance to identify deviations from expectations, opportunities for improvement, and report these performance results to those responsible for evaluating the effectiveness and ongoing adequacy of the adopted HSE/SLT management system;
- ***audit and compliance evaluation***, this is intended to verify the implementation status of the HSE/SLT Management System and compliance with applicable regulations at various organisational levels;
- ***management review***, this involves analysing and evaluating the performance achieved by the HSE/SLT Management System to ensure its relevance, reliability and effectiveness over time, thereby contributing to the formulation of intervention strategies and improvement objectives for the next cycle.

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5.2.6.1 Monitoring, measuring, analysing and evaluating performance

The HSEQ and Health functions of Eni, in agreement with the QHSE functions of business units, define general criteria in specific regulatory tools for the continuous monitoring of HSE/SLT performance and the representative information of the HSE/SLT management systems implemented in the production units/organisational structures associated with Employers.

Monitoring is also structured to support control activities defined in compliance models and the progress of objectives related to HSE/SLT topics.

Periodic monitoring of HSE/SLT indicators allows for:

- identifying areas for improvement;
- identifying corrective actions to achieve set objectives.

The outcomes of the monitoring process serve as input for review and the subsequent planning phase. The Employer, in line with company criteria and where necessary, defines the following in specific regulatory/organisational tools:

- roles and responsibilities for monitoring activities;
- operational methods for detecting, communicating, recording and analysing HSE/SLT performance;
- frequencies for data collection and analysis;
- methods for archiving and preserving documentation.

The monitoring activities are documented to ensure their traceability and verification, as well as the repeatability of data collection and the availability of acquired information and data.

Based on current Eni regulations and provisions, the company's QHSE unit specifies the data, indicators and information to be collected within its consolidation domain, using a consistent approach and within defined timelines, to promptly highlight areas needing attention and improvement.

The LD/SC may identify additional categories of data, indicators and information to be monitored that include all aspects that directly or indirectly reflect Health, Safety and Environmental performance, are subject to relevant regulatory developments, specific characteristics of the reference LD/SC and sector and technological advancements.

HSE and Health monitoring activities, which employ appropriate detection methods and suitable reactive and proactive indicators, are progressively expanded and updated based on experience, new needs and international developments on the subject.

The frequency of data collection must allow for effective monitoring of the implementation and operation of the HSE and SLT management systems and provide insights for identifying areas requiring increased focus and action.

The HSE/SLT Management System of Versalis, in accordance with Annex J 'Planning, Monitoring and Reporting of HSE Indicators' to Eni's MSG HSE and MSG SLT, includes periodic and systematic monitoring by the LD/SC of the key indicators related to health, safety and the environment (e.g., waste, emissions, environmental investigations, accidents, etc.).

The reporting process addresses management needs by acquiring data and information through databases at various consolidation levels, allowing for constant trend representation and the identification of abnormal deviations to implement necessary corrective or improvement actions.

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The reporting process ensures the availability of data related to the management of HSE/SLT aspects to:

- demonstrate adherence to the principles stated in the HSE/SLT Policy;
  - demonstrate compliance with relevant regulatory requirements;
  - demonstrate the effectiveness and adequacy of Versalis's HSE/SLT management system model and the HSE/SLT management system models of the Operating Units and Italian and foreign companies under Versalis;
  - ensure traceability of information;
  - meet the needs related to the Sustainability Model and the Organisational Model 231;
  - disseminate data on the performance of defined indicators, highlighting any abnormal deviations to undertake appropriate corrective or improvement actions.

Reporting is accomplished through periodic HSE/SLT reports (accidents, waste management, audits, etc.) prepared by the company's QHSE unit, which include aggregated data related to the LD/SC.

The definition of criteria and methods for managing HSE/SLT reporting activities is entrusted to the company regulatory tool opi hse 144 versalis/qhse 'HSE Monitoring and Reporting Activities', which complies with the requirements of Annex J to Eni's MSG HSE and MSG SLT.

The company's QHSE unit organises the received data and ensures its dissemination within Versalis and to the relevant Eni functions, according to the methods outlined in the aforementioned regulatory tools.

The main elements of HSE/SLT reporting include:

  - HSE/SLT training;
- results of system audits and HSE/SLT compliance checks;
  - HSE/SLT investments and current expenditures;
  - analysis of deviations between results and objectives;
  - health surveillance, occupational hygiene, occupational diseases, health promotion, healthcare, medical emergencies and travel medicine;
  - environmental protection (energy balance; atmospheric emissions; water consumption and discharges; waste production and management, soil and remediation, oil spills, etc.);
- accident (injuries) and incident situation and activities to protect workers' health;
  - process safety coordinated with asset integrity aspects;
  - major accident prevention;
- hazardous substances and preparations (safety data sheets);
  - logistics and transport of substances and products;
  - biodiversity.

The list of HSE/SLT reporting contents can be supplemented in relation to:

- Eni's guidelines;
  - the needs of Versalis and the LD/SC;
  - the evolution of HSE/SLT regulations.

The HSE/SLT Management System includes reporting as a tool for data consolidation both at the company level and at the Eni level.

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The reporting process ensures the availability of data related to HSE/SLT management activities to evaluate the effectiveness and ongoing adequacy of the management system, produce periodic Eni HSE/SLT reports, ensure traceability of information, identify improvement objectives and meet the needs related to the sustainability model of Versalis and, consequently, Eni.

The internal company reporting and the methods for transmitting HSE/SLT data to Eni are defined by the aforementioned operating instruction opi hse 144 Versalis/qhse “HSE Monitoring and Reporting Activities”, Annex J to MSG HSE and MSG SLT.

Regarding current expenses and HSE/SLT investments, the company's QHSE function collects and processes data transmitted by the LD/SC to allow a comparative representation of all economic and staffing data of the QHSE function (HSE/SLT Cost Accounting and Reporting Manual).

The company's QHSE unit prepares an internal management report on a quarterly basis to monitor the company's main HSE/SLT indicators.

Reporting addresses management needs, and data and information are processed and aggregated to constantly understand performance indicator trends, highlight abnormal deviations and implement corrective or improvement actions.

Periodic reporting is conducted twice a year during the review, monthly for accident indices and quarterly for GHG, according to guidelines established by Eni's HSEQ and Health functions. The review documentation forms part of these reports.

With regard to behaviours with an HSE/SLT risk, they can be identified and monitored in the following situations:

- during the normal course of the Employer Line/RSPP HSE activities;
- during Technical Audits or HSE/SLT legislative compliance checks;
- during incident and near-miss investigations;
- through direct reports from workers and supervisors.

Suspected behaviours with an HSE/SLT risk are reported to the Employer and the relevant human resources function for verification of the actual risky behaviour and assessment of the opportunity to initiate disciplinary procedures, in compliance with the law and applicable collective labour agreements, as contemplated by opi hse 160 ve.

Specifically, the supervisor informs the employer line HSE, which gathers information related to a report and, after identifying any behaviours with an HSE/SLT risk, forwards them to the relevant human resources management function

In the case of behaviours with an HSE/SLT risk identified in contractor personnel, the contract manager is informed to apply protective measures against the contractor and request information on any measures, including disciplinary actions, taken by the contractor against their employee. Examples of behaviours with an HSE/SLT risk include but are not limited to:

- failure of personnel to attend mandatory HSE/SLT training courses;
- failure of personnel to attend health surveillance appointments;
- failure to comply with emergency plans;
- failure to use personal protective equipment required for the job;
- failure to comply with speed limits when using company vehicles;
- actions that are clearly contrary to or deviate from the operating instructions received or the delegated roles identified in the HSE/SLT context;
- behaviours that may endanger one's own safety and that of others.

Disciplinary actions are recorded in INDACO and aligned semi-annually with the relevant HR function.

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5.2.6.1.1 Conformity assessment

In accordance with Eni's MSG HSE and MSG SLT, Versalis has established formalised Management Systems at each LD/SC. Their compliance, correct and continuous implementation, in line with current regulations and the most advanced standards, are verified by leading certification bodies.

The relevant certifications are:

- Environmental Management System according to ISO 14001;
- Occupational Health and Safety Management System according to ISO 45001;
- Social Responsibility Management System according to SA8000.

5.2.6.2 Internal audit

In accordance with Eni's MSG HSE and MSG SLT, Versalis contemplates the following types of audits within the sphere of HSE and Health:

- ***HSE and Health technical audit***, these are integrated HSE/SLT management system audits aimed at verifying the compliance of the management system adopted by the organisational entity under review with the requirements defined in

  this procedure (including the control standards contemplated by the compliance model and Eni's Model 231 within the sphere of HSE) and its complete and correct application;
- ***HSE/SLT regulatory compliance checks***, these are aimed at verifying the compliance of production units/organisational structures or specific operational activities with current legal provisions, applicable sector-specific specifications and international standards considered best practices in cases where specific legal provisions are absent;
- ***system audits,*** conducted as part of the certification of the adopted management system to verify its compliance with the requirements of the relevant regulations and/or international standards (ISO 45001, ISO 14001, etc.);
- ***process safety audits,*** these audits verify the level of implementation and effectiveness of the Process Safety Management System in accordance with Annex S-C “Process Safety Management System” of Eni spa's HSE Management System Guideline, as well as best industrial practices and international standards (e.g.: U.S. OSHA CFR 1910.119 “Process Safety Management of Highly Hazardous Chemicals”);
- ***HSE/SLT audits*** conducted on suppliers.

The planning, execution and reporting of audits, as well as the conduct of post-audit actions, are carried out in accordance with Annex L to MSG HSE, MSG SLT, opi hse 172 ve “Discipline of Health, Safety and Environment Audits”, and opi hse 155 “Conducting Process Safety Audits”.

In particular, the general criteria related to the audit process include:

- planning activities (audit schedule and audit plan) based on a three-tier audit system;
- competence/knowledge of both internal and external auditors, respect for the principle of independence concerning the activity being audited, and managing the register of internal auditors;
- methods for conducting and documenting/reporting audits;
- method of managing the findings that emerge through identification, implementation and follow up, until the related improvement actions are closed;
- method for verifying the implementation and effectiveness of corrective actions;
- method of communicating audit results to Management.

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At Versalis, the scheduling of:

- ***Technical Audit HSE/Health and Process Safety Level II Audit*** is managed by the Company's QHSE Unit. The Level II TA and PSA are conducted every three years. The Eni Synergi-AUDIT information system ensures the planning and reporting of the outcomes of Level II TA and PSA, as well as the monitoring of corrective actions. This information system guarantees periodic reporting flows to the Eni HSEQ function. Reporting to the top management of Versalis on the outcomes and follow-up of corrective actions from Level II audits occurs biannually. The contract manager verifies the requirements for third-party auditors.
- ***VC, HSE/SLT Technical Audit and Process Safety Audit of level I*** are managed by the single LD/SC:
  - the VC are scheduled annually, while level I TA are scheduled to ensure that, at least every three years, all processes and operations within the scope of the Management Systems are examined. In particular, the frequency and coverage of the audits are determined based on the results of the risk assessment of their activities, the results of previous audits and the HSE performance data achieved in relation to the set objectives and targets;
  - The level I TA, in addition to verifying the compliance of the HSE management system adopted by each Operating Unit with the reference standards ISO 14001 and ISO 45001, the Eni HSE MSG and MSG SLT and related annexes, includes verifying the application of the 231 control standards in the sphere of HSE/SLT and the Versalis HSE/SLT Management System;
  - level I Process Safety Audits are conducted annually except in the year when the three-year level II PSA is scheduled;

  On the Eni Synergi-AUDIT information system, each LD/SC must enter the planning of all scheduled audits, the report of the outcomes (both Non-Conformities and Observations, indicating those of 231 relevance, as well as Strengths) and must monitor the status of corrective actions. This information system ensures periodic reporting flows to the Company's QHSE Unit for all types of audits.
- ***System Audits*** are the responsibility of the Certifying Body, in agreement with the LC/SC.

As part of the preparation of the Four-Year HSE/SLT Plan, the Four-Year Audit Plan is defined, prepared by the Company's QHSE Unit and approved by the CEO of Versalis, which includes the planning of the aforementioned audits, except for those conducted on suppliers, which are planned based on specific needs.

In the Four-Year Audit Plan, more comprehensive and detailed information is provided for actions whose implementation is expected to start from the first year (budget year).

The elements subject to verification are distinguished according to the type of Audit conducted, and in particular:

- the methods for conducting Level I and II TA are defined by the opi hse 003 “Checklist for Conducting Technical HSE Audits” and the opi hr 015 “Checklist for Conducting Health Technical Audits”;
- for the VC, specific checklists are prepared in accordance with the requirements of Annex L to MSGE HSE, with the collaboration of specialised third-party companies to more precisely address the relevant regulatory requirements for the activities developed by Versalis;
- for level I and II PSA, they are defined by opi hse 155 ve “Conducting Process Safety Audits”;
- for System Audits, the elements of reference are the requirements identified by international standards.

Within the procedures/operating instructions that describe the operating procedures for conducting auditing activities, in accordance with what is established by Eni, the following must be defined and documented:

- the timelines for scheduling activities (Audit Schedule);

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- the competencies of both internal and external auditors, respecting the principle of auditor independence from the activity being audited, and the methods for verifying their competence;
- the methods for recording verifications;
- the methods for identifying and recording any anomalies found in relation to what is prescribed by the Management System or the applicable HSE/SLT regulations and requirements;
- the methods for identifying and applying corrective and/or preventive actions proposed for resolving anomalies;

- the responsibilities and methods for verifying the implementation and effectiveness of the identified improvement actions;
- the methods for communicating results and follow-ups to the relevant figures and company management.

Audits conclude with the issue of a report containing the findings and a programme for addressing and improving the observed anomalies. This programme includes the commitments, in terms of corrective and improvement actions, that the relevant functions in charge take on.

These reports form one of the foundations for the development of the Four-Year HSE/SLT Plan and serve as a reference point for the following audit cycle.

To ensure the comparability of audit results conducted by all LC/SC, each is required to adopt a classification of findings structured into five levels, listed below in descending order of criticality:

- Major Non-Conformities (Major NC);
- Minor Non-Conformities (Minor NC);
- Observations;
- Conformity;
- Strengths/Best Practices.

Versalis has decided to employ specialised third-party companies for conducting audits, with auditors certified by an accredited body and/or possessing adequate expertise in specific sectors identified within the company and unrelated to the area/activity to be audited. These auditors are assigned under an Eni framework contract, subject to Eni qualification.

Auditors must possess the necessary competencies in terms of personal characteristics, general and specific knowledge, skills, work and auditing experience, education/training, in accordance with the UNI EN ISO 19011 standard and Annex L “Criteria and Methodologies for Audits” to the Eni HSE MSG. This ensures that the audit activity is conducted in compliance with the Eni code of ethics, the MSG HSE and MSG SLT and the Versalis HSE/SLT Management System.

The Audit Manager, upon completing the inspection activity, issues a report containing the audit findings and a concise description referencing the supporting evidence. This report highlights strengths, areas for improvement with observations/recommendations and/or any non-conformities identified during the audit. The reports are sent to:

- Level II TA: the QHSE/SGAN unit, which then disseminates it to the Employer of the LD/SC, the CEO, the Head of the Company's QHSE Unit, the Industrial Director for the relevant sites and the Director of the Business concerned;
- VC, level I TA and ACM: the Employer of the LD/SC.

As regards level I and II PSA, the reports are sent to the Employer and the HSE representative of the Management System and to the Company's QHSE function, which then disseminates it to the CEO, the Head of the Company's QHSE function, the Industrial Director for the relevant sites and the Director of the Business concerned.

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5.2.6.3 Management review

The Management Review process is conducted at the completion of an operational cycle of the HSE and Health Management System, also utilising data and information made available from monitoring, auditing and reporting processes. Its results, aimed at continuous improvement, lay the groundwork for the next operational cycle.

The Review activity is carried out according to international best practices, both at the level of individual LD/SC (with participation from, among others, Health reference figures responsible for all health aspects), managed by the Employers in the setting of the HSE/SLT Committees of the LD/SC, and at the corporate level, within the framework of the Corporate Review meeting, chaired by the President and the CEO.

During the review, the following elements (input documents) related to HSE and Health aspects are evaluated:

- effectiveness of actions taken in response to the outcomes of previous reviews;
- evaluation of the implications on the HSE/SLT Management System following:
  - updates to the analysis of the corporate context and stakeholders;
  - organisational changes;
  - regulatory changes;
  - technological progress;
- elements arising from the update of HSE and Health risk assessments and identified improvement opportunities.
- progress of actions identified from improvement opportunities in HSE and Health;
- reports from delegated individuals on the exercise of powers contemplated by delegation documents in HSE matters and from doctors appointed by the Employer;
- reports on activities of worker participation and consultation and communication to stakeholders;
- relevant HSE and Health reports or complaints from within and outside the organisation;
- analysis of HSE and Health performance results achieved following the application of the Management System, including accident data related to suppliers within contracted activities;
- analysis of any discrepancies identified between achieved results and set objectives, including assigned KPI, and examination of the reasons for these differences;
- analysis of major Non-Conformities/Observations identified during activities;
- outcomes of investigations into incidents/near misses, including those involving suppliers in the setting of contracted activities, and analysis of identified corrective actions. Any health emergencies that occurred are also analysed;
- prevention and emergency response activities;
- analysis of results obtained in the field of research and technological innovation in HSE and Health;
- personnel training and awareness activities;
- update of the cluster to which the LD/SC belong;
- degree of results of the process of participation and consultation of personnel working on behalf of the organisation;
- reports, requests, communications, or complaints in HSE/SLT matters from both internal (Internal Audit, Sustainability, etc.) and external (Stakeholders) sources;
- outcomes of HSE and Health auditing activities (progress of activities, corrective actions);
- analysis of major Non-Conformities/Recommendations/Observations identified following audits;
- verification of results from inspections conducted by control bodies;
- analysis of HSE and Health expenditures;

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reports on information, training and education activities in HSE/SLT matters, including mandatory training under current regulations;

- verification of the overall adequacy and effectiveness of the HSE/SLT Management System adopted by each LD/SC;
- Sustainability objectives;
- analysis of ongoing or planned Sustainability projects;
- proposals for improvement.

The review activity concludes with the identification of any potential:

- changes to be made to:
  - HSE/SLT policy;
  - HSE/SLT objectives;
  - elements of the HSE and Health Management System;
- changes in economic, human and material resources in the HSE and Health areas;
- improvement actions.

The review activity for LD/SC occurs at least semi-annually.

The findings from the review activities conducted by the LD/SC are recorded in the minutes of the establishment's HSE Committee. A copy of the minutes is sent by the LD/SC to the Company QHSE Unit by the first ten days of February and September. The Corporate Review, the agenda of which is set by the CEO, is conducted twice a year: in February and September (reference dates). The outcomes of the review activities conducted by the Operating Units form an integral part of the Corporate Review.

In the Corporate Review conducted in February, in particular, the accounts for the previous year are analysed and strategic HSE and Health objectives and KPI for the current year are defined.

The definition of HSE and Health improvement KPI is based on:

- analysis of any discrepancies between results and objectives;
- analysis of incidental events and emerging HSE issues related to previous years;
- audit results;
- identification of new needs by stakeholders or changes in the reference context;
- any requests, communications, or complaints from outside;
- any specific instructions from Eni and/or the Versalis Supervisory Body;
- evidence from updated assessments of HS risks and environmental and Health aspects;
- new regulatory provisions on HSE/SLT and/or the issue of procedures and operating instructions.
- the company's willingness to anticipate regulations, set even stricter limits than the law and adopt best practices.

In the Corporate Review conducted in September, in particular, the implementation status of the HSE and Health Management System is assessed in relation to the annual objectives set and the results achieved to date are evaluated (objectives, KPI, etc.). A documented and archived report captures the discussion topics and details the objectives and decisions made.

The Review process is documented by a Report with the drafting of the minutes of the Corporate HSE and Health Review meeting. The minutes reflect the decisions made as a result of the meeting and primarily contain (non-exhaustive list):

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- list of participants and their organisational positions;
- discussion, decisions, actions, projects, planned activities;
- need for updates to the audit schedule;
- any needs for training initiatives and proactive promotion and dissemination of the HSE and Health culture;
- opportunities for updating Policies and Management Systems.

The preparation of the Review Minutes is the responsibility of the Company's QHSE Unit.

Following the Review meeting, the Company's QHSE Manager sends the Review Minutes to the participants, the Eni HSEQ and Health function and the HSE representatives of the relevant LD/SC.

Complementing the Corporate Review activity, a Management Meeting is held weekly to examine and discuss significant events that occurred in the previous week, including those with HSE and SLT implications.

5.2.7 Improvement



The phase called “HSE Improvement” consists of the following sub-processes:

- ***analysis and management of HSE/SLT events***, aimed at identifying HSE/SLT events, analysing their causes and identifying, implementing and verifying the effectiveness of actions to reduce their consequences and effects
- ***non-conformities and corrective actions***, for defining methods to manage non-conformities and the resulting corrective actions
- ***continuous improvement***, to ensure the management of HSE/SLT issues according to a preventive and proactive approach, focused on improvement.

5.2.7.1 Analysis and management of HSE/SLT events

Versalis, in various regulatory tools (procedures and operating instructions), has defined the criteria for analysing and managing health, safety and environmental events, as detailed in the company's regulatory database, Nemo's.

During the activities, anomalous situations (findings) may be highlighted that could have actual or potential repercussions on the environment or on the health and safety of people and/or the safety of facilities. Effective and efficient management of these findings allows for the prompt identification and removal of gaps and weaknesses in the management system, analysis of their causes and, consequently, prevention of their recurrence. This helps prevent potential non-conformities through the implementation of appropriate actions to improve the system itself.

Additionally, actions may be required based on the analysis of monitoring, auditing and reporting activities and on stakeholder notifications, either to correct deviations from what was planned or defined or to improve specific aspects of the Management System (SG).

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The Employer, in accordance with the dedicated regulatory tools, ensures the management of HSE/SLT events by ensuring for each event:

- immediate management to protect people, assets, the environment and Eni's image, promptly restoring safe conditions and containing any consequences;
- correct classification according to Eni's standards;
- determination of the level of investigation based on which the depth of the event analysis is assessed;
- activation of the informational notification flow where required, both internally and to the relevant external authorities;
- conducting an investigation to identify appropriate corrective and improvement actions to prevent recurrence;
- management of the follow-up of identified actions and verification of their effectiveness after an adequate observation period. Before implementation, all actions must be evaluated in terms of possible emerging risks introduced or changes to existing risks;
- dissemination of the lessons learned in terms of both event dynamics and cause analysis as well as effective corrective actions that may be considered best practices to share also externally.

The management of findings and corrective/preventive actions involves using Eni's software applications (e.g., Indaco for incidental events, Synergi-AUDIT for findings from audits and safety analyses, etc.), possibly supplemented by a specific “Register of Findings” that must contain all relevant information regarding:

- description of the finding;
- classification of the finding;
- analysis of the causes generating it;
- corrective and improvement action;
- person in charge of implementing the action;
- expected completion date for the action;
- closure date of the action;
- verification of effectiveness.

To ensure the measurement and interpretation of results, indicators are identified that allow evaluating HSE/SLT performance trends and quantitatively identifying realistic improvement objectives and targets. Findings can arise from audits, reports, emergency or incidental situations and corrective actions must be appropriate to the real or potential effects of the finding that originated them.

The Employer ensures that the results of the above process are communicated to workers, including through their representatives, and to other relevant stakeholders.

The Company's QHSE unit periodically ensures an overall analysis of data related to events, at least within the scope of review activities, and facilitates cross-cutting dissemination in the form of Lessons Learned and dedicated analyses. Significant HSE/SLT events regarding frequency and severity of the real or potential consequences are promptly and thoroughly disseminated.

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Investigation and Analysis of Incidental Events

It is essential to learn as much as possible from incidental events to enhance prevention capabilities. To this

end, incidental events are followed by a thorough investigation of the causes that led to them.

The procedure for investigating and analysing incidental events defines:

- the method for establishing the investigation team;
- the assignment of tasks and responsibilities;
- the timeline for conducting the investigation;
- the recipients of the final report;
- the follow-up procedures for the recommendations contained in the Investigation Report.

All incidental events must be analysed within the HSE Committees of the LD/SC. The method used for event analysis is Root Cause Analysis, as described in opi hse 156 ve.

The "Lessons Learned" will be extended, where applicable, to all areas of Versalis (lesson learnt) according to the methods outlined in opi hse 105 ve.

Data related to incidental events are entered by the LD/SC into the dedicated INDACO Database.

5.2.7.2 Non-conformities and corrective actions

Non-conformities can arise from auditing activities, reports, the analysis of emergency situations or HSE and Health incidental events and emergency drills. The corrective actions identified must be suitable for resolving these non-conformities, considering both the actual and potential effects.

Some non-conformities may also emerge following the analysis of incidental events. In such cases, if the non-conformity is a direct cause of the event, it will be treated as the root cause of the event.

Employers ensure the control of non-conformities and corrective actions, each within their area of responsibility, through specific regulatory tools that Versalis has implemented (opi hse 172 ve) and are documented in the company's regulatory database, Nemo's. The management of non-conformities and corrective actions ensures:

- identifying non-conformities against the specific HSE/SLT requirements;
- investigating non-conformities to determine their causes and undertaking corrective actions;
- recording and communicating non-conformities and the results of corrective actions taken;
- monitoring compliance with deadlines;
- reviewing the effectiveness of the corrective actions undertaken.

In the event that major and/or minor non-conformities arise during an audit, the following timelines must be adhered to for their resolution:

- immediate mitigation measures (even temporary) must be adopted and completed within 3 months of the finding;
- complete closure of NC must occur within 9 months for Major NC and 12 months for Minor NC
- for Process Safety activities, the closure of NC, if not compatible with plant operations, must be planned to be addressed at the first opportunity for plant shutdown.

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Reporting for Level I and II audits must be completed in the Eni Synergi-AUDIT information system within 1 month of receiving the audit report, so as to ensure timely monitoring of corrective actions.

5.2.7.3 Continuous improvement

Versalis, through its organisational structure and actions implemented in accordance with the procedure, continuously ensures the suitability, adequacy and effectiveness of the developed HSE and Health Management Systems by:

- continuously improving HSE and Health performance;
- promoting a culture and developing competencies (knowledge management) in HSE and Health;
- encouraging worker participation in implementing actions for the continuous improvement of the HSE/SLT Management System;
- communicating relevant continuous improvement HSE/SLT results to workers, including through worker representatives;
- promoting research and technological innovation projects in HSE and Health.

The HSEQ function of Eni conducts studies, analyses and benchmarking, ensuring the dissemination and updating of methodologies, know-how and best practices.

The activity of sharing HSE/SLT knowledge aims to spread a proactive and excellence-driven culture, focused on continuous improvement consistently within Eni and Versalis. The HSEQ function of Eni and the QHSE unit of Versalis prepare and maintain appropriate tools for the exchange and dissemination of technical knowledge among all workers and within the HSE and Health professional area. The Employer, in line with regulatory tools and competency requirements for company roles impacting HSE and Health, is responsible for managing HSE/SLT knowledge processes to preserve and disseminate the wealth of knowledge and experience.

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6. CHANGES MADE

The document is revised for:

- updating the HSE/SLT Policy in accordance with the new requirements of the HSE MSG and SLT MSG;
- updating the HSE/SLT Management System in line with the MSG HSE, MSG SLT and Versalis's HSE model;
- updating the company's organisational structure;
- updating definitions and regulatory references.

7. UPDATE RESPONSIBILITY

The units and positions involved in the activities regulated by this document are responsible for detecting operational company events that require updating.

These findings are reported to the Organisation unit and QHSE Management that coordinates the activities of updating this document.

8. ARCHIVING, RETAINING DOCUMENTATION AND TRACEABILITY

The units and positions involved in the activities regulated by this document ensure, each to the extent of their responsibilities and also through the information systems used, the traceability of the data and information and retain and store the documentation produced, hard and/or soft copies, so that the different stages of the process can be reconstructed.

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