



**Document:**  
**Guideline**  
**PKG\_COMP\_LG02**  
**Policy on health, safety, and well-being in the**  
**work environment**

Version 1.1

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## Guideline

### Policy on health, safety, and well-being in the work environment

#### Document History

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## 1. Scope

This Policy applies to Kirey S.r.l. and, due to its management and coordination activities, to all its subsidiaries (hereinafter collectively referred to as the “Kirey Group”).

Kirey Group is committed to protecting the health, safety, and psychological and physical well-being of its employees, as well as all stakeholders involved in its activities, including customers, suppliers, and partners. This commitment is a fundamental pillar and top priority of its operational strategy and corporate identity.

## 2. Values and goals

This Policy, which forms part of the Occupational Health and Safety Management System (“OHSMS”), has been adopted by Kirey Group as a fundamental tool for formally establishing and promoting its values of integrity, excellence, and accountability. In full accordance with the principles set out in the Code of Ethics, Kirey Group places the value of the individual at the centre of all its activities, committing itself to ensuring safe and healthy work environments aimed at preventing accidents and occupational illnesses through the active involvement of all stakeholders.

These values give rise to specific commitments. In fact, the Kirey Group's work is governed by:

- responsibility towards sustainable development through environmental protection and the promotion of an inclusive society, ensuring equal opportunities and valuing diversity;
- protection of personal integrity, as health and safety are not considered merely a regulatory requirement, but a fundamental and non-negotiable safeguard, for which there is a commitment to protect the physical and mental integrity of anyone working on behalf of the Kirey Group;
- compliance with international standards through active support for international initiatives on sustainability and safety.

With this objective as a focus, Kirey Group takes on the task of removing hazards and reducing risks, promoting a culture of prevention that spreads to every level of the organization.

According to the principles stated above, Kirey Group pursues the following strategic objectives:

- **Protection and prevention:** protecting the health and safety of employees, customers, suppliers, and stakeholders by applying advanced methods to identify and reduce risks at their source. This commitment extends to crisis management (seismic, hydrogeological, infectious emergencies, etc.) and emerging risks related to climate change.
- **Vulnerability analysis:** continuous assessment of risks associated with changes in the world of work, with a particular focus on the green, digital, and demographic transitions, to proactively adapt organizational models.
- **Well-being and innovation:** promoting organizational well-being by adopting measures based on the latest medical, scientific, and technological research, focusing on the overall health of the individual.
- **Sustainable supply chain:** incorporating ethical, social, and safety criteria into the selection and monitoring of suppliers, ensuring that the Group's standards are respected throughout the value chain.
- **Dialogue and participation:** ensuring transparent and effective communication, ensuring consultation and active participation of workers and their representatives in the continuous improvement of the system.
- **Safety awareness:** promoting a culture of prevention that encourages responsible behaviour at every level, supported by ongoing, targeted training and information programs.
- **Compliance and improvement:** ensure full compliance with applicable legal requirements and other

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requirements to which the company has committed; monitor Improvement Plans using performance indicators and advanced technologies to minimize residual risk.

To achieve these objectives, Kirey Group is committed to providing the necessary human, technical, and financial resources, constantly implementing international best practices.

### 3. Commitment to People and the Work Environment

Kirey Group's primary commitment is to take care of the people and environments in which they operate, creating a healthy, safe, and inclusive environment. We are committed to valuing all forms of diversity, preventing, and mitigating psychosocial risks, and promoting the physical, psychological, and social well-being of our employees, with particular attention to individual specificities and vulnerabilities.

In this context, individuals are called upon to take responsibility for their own safety and to actively collaborate with the Occupational Health and Safety Management System (OHSMS), reporting any non-compliance with internal regulations. Kirey Group undertakes to promote a culture of safety based on knowledge and scientific innovation, placing it at the service of the community.

Kirey Group's strategy is consistent with the European Union's strategic framework, as it is based on three key guidelines:

- management of developments resulting from the green, digital, and demographic transitions;
- prevention of accidents at work and occupational diseases;
- preparation and response to health crises.

Kirey Group maintains a Safety Management System that complies with current legislation (Italian Legislative Decree No. 81 of April 9, 2008, as amended) and UNI ISO 45001, which integrates stakeholder expectations and periodic analysis of the internal and external context. The system adopts a multidisciplinary approach to risk assessment, considering the combined effect of the working environment, processes, equipment, and the subjective conditions of workers, ensuring appropriate prevention and emergency management measures to protect employees, third parties, and local communities.

Health paradigm. In addition to primary prevention, health surveillance extends to emerging risks (known as “*technostress*,” cognitive load, travel risks, and critical exogenous events) through statistical and epidemiological data analysis, which is essential for monitoring the effectiveness of the initiatives undertaken.

In particular, OSH technical skills are integrated with innovative disciplines such as:

- neuroscience and ergonomics (physical, cognitive, and organizational);
- environmental hygiene and occupational therapeutic psychology;
- responsible artificial intelligence and innovations in telemedicine.

Finally, our Kirey Group Integrated Welfare system supports health surveillance with the aim of meeting the needs of workers and their families, promoting the best possible work-life balance.

### 4. Change management

Changes in working practices have led to the coexistence of in-person work, which is essential for social interaction, and increasingly agile and smart working practices. Kirey Group supports its people in the

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balanced and voluntary adoption of this hybrid model.

Through its continuous improvement programs, focused on work-life balance policies, Kirey Group is committed to adopting new technological tools, processes, and environments to manage digital transformation. Attention is paid to emerging risks and the rethinking of physical spaces, ensuring that they remain always healthy, safe, inclusive, and innovative.

With the same approach, Kirey Group addresses the risks associated with climate change by adopting an integrated assessment strategy for structural, organizational, and subjective vulnerabilities. The goal is to strengthen the effectiveness of safety measures and mitigation actions, proactively reducing any potential operational malfunctions.

Kirey Group recognizes change management as an ongoing practice to meet the expectations of all stakeholders. Understanding and anticipating developments in the economic and social context is a priority for us.

## 5. Commitment and transparency

The management of Kirey Group assumes full responsibility for the implementation of this Policy and undertakes to review it periodically - at least once a year or when significant organizational changes occur - to ensure its continued suitability, adequacy, and effectiveness.

This document is distributed to all persons working under the control of the organization and is made available to all interested parties through the Company's institutional communication channels, so that it may be shared and serve as a source of inspiration for continuous improvement.

## 6. Reporting Non-Compliance

Any deviations from the Policy and/or non-compliant applications must be reported using the tools made available by the company. See Guideline PKG\_COMP\_LG01\_Reporting Whistleblowing.