

Document Annexed to the Management System Manual of GOTTI GIUSEPPE s.r.l.

Scope:

Fabrication by Electro-welding of Equipment, Piping and Accessories for the Industry

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Issued By	Verified By	Approved By
QSR (Quality System Responsabile)	OD (Operational Direction)	MD (Managing Director)

Company Policy

The direction of **GOTTI GIUSEPPE S.r.l.** has always pursued a quality policy aimed at satisfying the customer's needs and to improve Gotti performance, both in terms of operational effectiveness and in terms of organizational and economic efficiency.

To this end, the Direction has identified the following points as cornerstones of its quality policy:

- the constant research for technical reliability of its activities through an adequate availability of technical resources for the execution of services and through the continuous training of staff;
- the commitment to complete the work in the correct and technically adequate way as per agreed contract conditions;
- the will to improve all operational aspects;
- great attention to employees;
- the will to establish a collaboration among those working for the company;
- willingness to respond promptly and effectively to all needs expressed by the customer;
- a policy of selecting suppliers focused to establish long term relationships to ensure the technical consistency;
- to improve continually the coordination and flow of information between the various company departments;
- to have an administrative management always more efficient;
- to offer customized technical solutions and good flexibility in the supply options;
- to act in full respect of the regulations applicable to activities and provided products;
- to optimize the planning and production processes.

The Policy of Prevention and Environmental Protection

GOTTI GIUSEPPE S.r.l. wants to contribute to the growth of the well-being of its community through the balanced management of the environment to ensure sustainable development for the protection of future generations. The Environmental Policy of **GOTTI GIUSEPPE S.r.l.** is based on a consistent set of principles to which should refer each objective, action and achievement in the field of environmental management.

Continuous improvement of environmental performance

To ensure compliance with environmental legislation through verification, identification, assessment and monitoring of each new rule.

Continuous improvement of environmental performance

To improve from year to year the results of the environmental management, improving Gotti activities and services in respect of environmental policy.

Environmental Protection

To Prevent, eliminate, and in case it's not totally possible, to reduce pollution and use of natural resources, using the best and economically feasible available technologies.

Environmental Culture and Professional Development

To develop at any level of the Company, the sense of responsibility towards the environment through adequate knowledge of environmental information measures, education and training initiatives, that are commensurate with the efforts of everyone in the Organization. To this end, the Direction of **GOTTI GIUSEPPE S.r.l.** is formally committed to diffuse, implemented and supported the environmental policy to all its employees.

Diffusion of Environmental Principles

To diffuse inside and outside the organization, in particular with the suppliers working for the company, the principles of the Environmental Policy and the achieved results, looking for transparency and dialogue and encouraging the general commitment to avoid pollution.

Collaboration with interested parties

To collaborate with all parties interested in territorial government policies, in order to foster dialogue, transparency and sharing information in the most appropriate locations and in order to make a contribution commensurate with role and power.

Management of environmental effects

To monitor and, if and where possible, to reduce the atmospheric emissions from fixed and mobile sources present in the daily operations of the company. To control the production and disposal of waste and liquid waste, trying where possible, to reduce the amount and harmfulness. To analyze and optimize the energy and water consumption. To promote the correct environmental behavior at customer sites.

New Projects

To ensure prior assessment of all environmental aspects in any activities using, where possible, the operational solutions with less environmental impact. To diffuse, implement, maintain active and periodically update the present Environmental Policy according to the evolution of the environmental, socio-economic and institutional situation.

The Policy for Health and Safety in the Workplace

The Company, aware of the centrality of Workers Health and Safety Issue during the execution of their duties, is committed to pursue continuous improvement in this area.

To this end, it ensures the availability of adequate human resources, equipment and economic conditions necessary to translate this commitment into a concrete strategic objective, cross and additional to the general purposes of the Organization.

The Company guarantees the physical and moral integrity of its collaborators, with working conditions that respect individual dignity and safe and healthy workplace, in compliance with local regulations on accident prevention and protection of workers in the workplace.

The Company conducts its activities proposing technical, organizational and economic conditions that allows to ensure a proper accident prevention and a healthy and safe working environment.

The Company is committed to spread and consolidate among all its employees and subcontractors a culture of safety, developing risk awareness and promoting responsible behavior by all the Parties.

The Company is committed to:

- comply with legislation and all applicable national laws on the Health and Safety at Work;
- pursue the continuous improvement of performance in the field of Health and Safety in the Workplace for all the activities and areas of the Organization;
- implement and maintain a health and safety management system in the Working Place conforming to OHSAS 18001;
- design and implement activities & production processes with criteria able to prevent possible accidents and safeguard health and safety of workers, adopting to this end the best techniques and technologies available on the market;
- put the workers in the best conditions to carry out the assigned tasks in safety, also through training, information and awareness, with particular attention to the problems of alcohol addiction and drug addiction;
- establish and maintain an active dialogue in collaboration with all the Interested Parties in order to make transparent the Company's position in the field of Health and Safety in the Workplace;
- to handle specifically the business, which is the core of the company processes:
 - a. taking care of providing measures of prevention and protection to the different activities (welding, machining, heat treatment, etc.);;
 - b. providing and implementing systematic controls, actual and substantial of organization, equipment and human resources;
 - c. defining a control procedure of any subcontractors of the Organization to ensure that the latter meets the legal requirements relating to Health and Safety in the Workplace.

The policy against alcohol and drug addiction

The company, as part of its commitment to promote and ensure a safe and healthy working environment for the organization's staff, believes it's important to pay attention to all issues connected with the possible use and / or abuse of alcohol and drugs and psychotropic substances.

For this reason the company adopts this policy against alcohol and drug addiction, according to which:

- it's prohibited to introduce, administering and assume alcohol and narcotic drugs and psychotropic substances in the workplace;
- it's necessary an ongoing training efforts and information on the subject, with the involvement of experts on the effects of alcohol and drugs and psychotropic substances, although sporadic and in small doses as well as out of working activity time, with particular attention to the changes of psychophysical balance, the judgment of any dangerous situations and short-term reactions;
- it's a duty for the company to perform the controls required by law for "safety sensitive" tasks and it's a duty / obligation for workers who carry out those tasks (identified in document of assessment of risk of the Company) to take part to such controls, to be performed ensuring respect for the dignity of the workers and for their right to confidentiality;
- the controls will be carried out using the best available and approved equipment, and the controls will be also possible in the cases where there are valid and justified reasons / sufficient evidence to assume that an employee is under the influence of alcohol or drugs and psychotropic substances, or following to an accident, in full respect for the dignity and privacy of the employee;
- intends to promote the belief that addiction to alcohol and drug abuse is a treatable condition, for example, through paths of recovery and rehabilitation;
- the staff that considers themselves as dependent on alcohol and / or drugs is invited to look for medical advice, in case contacting the Company Doctor, and to follow a specific therapy and appropriate treatment without delay and especially before his condition can negatively affect the work abilities causing a danger to his own safety, to the colleagues safety or to third parties.