



I N S A F E H A N D S

OCCUPATIONAL HEALTH & SAFETY POLICY

Rev. 0

Ed. 1

Date 25/03/26

Occupational Health & Safety Policy

Occupational Health & Safety Policy (OH&S)

1. Scope

This Policy defines the principles and commitments through which REFLEXX S.p.A. protects the health and safety of people working for the company, with the aim of preventing occupational injuries and illnesses and promoting physical and mental well-being.

2. Scope of Application

This Policy applies to:

all employees and collaborators of REFLEXX S.p.A.;

visitors and third parties operating at REFLEXX S.p.A. sites/offices;

suppliers and contractors when carrying out activities on behalf of REFLEXX S.p.A.

3. References and Standards

Italian Legislative Decree No. 81/2008, as amended, on the protection of health and safety in the workplace. Applicable rules and guidelines on fire prevention and first aid.

UN Global Compact Principles on labour and human rights.

REFLEXX S.p.A. Sustainability Policy, including the value of employees and respect for human rights.

REFLEXX S.p.A. Supplier Code of Conduct.

UNI EN ISO 9001:2015 and UNI EN ISO 13485 Quality Management System, where relevant to products and activities.

4. Guiding Principles

Prevention and protection: we adopt proactive measures to reduce risks and protect people's health.

Compliance: we comply with applicable mandatory requirements and require third parties to act consistently with them.

Continuous improvement: we monitor indicators, near misses and reports, and define improvement actions.

Participation and safety culture: we promote awareness, shared responsibility and timely reporting.

5. Specific Commitments

5.1 Risk Assessment and Management

We carry out and keep up to date the risk assessment document, DVR, and the relevant prevention and protection measures.

We assess specific risks related to duties, workstations, display screen equipment, ergonomics and work-related stress.

We manage specific risks through procedures, operating instructions and technical and organisational measures.

5.2 Training, Information and Instruction

We ensure mandatory training and periodic refresher sessions, in line with the relevant risk profile.

We inform people about safe working procedures, emergency management, first aid and fire prevention.

We recognise training as a driver of continuous improvement and shared responsibility.

5.3 Emergency Management and First Aid

We establish emergency plans and evacuation procedures and periodically test their effectiveness.

We ensure the presence of trained emergency and first-aid officers in accordance with applicable legislation.

5.4 Reporting, Near Misses and Corrective Actions

We promote the reporting of hazardous situations and near misses without fear of retaliation.

We analyse events and reports, defining corrective and preventive actions.

We monitor H&S indicators and discuss them during review and coordination meetings.

6. Roles and Responsibilities

Employer / Amministratore Unico: defines the direction and ensures the resources required to protect occupational health and safety.

RSPP, external Prevention and Protection Service Manager: supports risk assessment, document updates and improvement plans.

Occupational Physician, external: responsible for health surveillance and health promotion.

Supervisors and workers: comply with procedures, correctly use tools and personal protective equipment where required, and report risks and near misses.

7. Monitoring, Indicators and Review

REFLEXX monitors at least the following indicators, where applicable:

number of injuries, serious injuries and occupational diseases;

number of near misses and reports;

hours of occupational health and safety training delivered;

corrective/preventive actions closed within the planned timeframe.

Management periodically reviews the Policy and related results, defining objectives and improvement actions.

8. Reporting Channels and Protection of Reporting Persons

REFLEXX S.p.A. provides internal reporting channels for incidents, near misses and non-conformities, ensuring confidentiality and protection against retaliation. For relevant reports, the safeguards provided under whistleblowing legislation, Italian Legislative Decree No. 24/2023, apply where applicable.

All REFLEXX S.p.A. stakeholders may report, in writing and also anonymously, any violation or suspected violation of the Code of Ethics, firstly to the relevant company managers and subsequently through the company's Whistleblowing channel.

For reporting purposes, the company has established dedicated channels for all relevant stakeholders:
for internal stakeholders, including employees, collaborators and agents: to the Internal Process Development Coordinator, ugo.cambiaso@reflexx.com, or, where the Coordinator is involved in the reported situation, directly to the CEO and Amministratore Unico, gianni.isetti@reflexx.com;
for external stakeholders, including customers, suppliers, public administration, banks and media: to whistleblowing@reflexx.com;
for all stakeholders, where the CEO and Amministratore Unico is involved: to the Chair of the Board of Statutory Auditors, v.campoantico@stlex.it.

9. Communication and Publication

This Policy is communicated to personnel and made available to interested parties upon request and/or

through company channels.

It is updated in the event of organisational, regulatory or risk-related changes.

10. Approval

Approved by: **Gianni Isetti – CEO and Amministratore Unico.**

La Direzione Sig. Gianni Isetti

A handwritten signature in black ink, appearing to read 'Gianni Isetti', is written over a light blue horizontal line.