ANNEX 2 SCOPE AND PURPOSE

1. PRESENTATION

VICO S.r.l., as part of a major expansion programme that began in 1997 with the acquisition of a large area, part of the former AGRIMONT plant in Cairo Montenotte (SV), has progressively transferred all its activities previously carried out at the original Altare site to the above-mentioned area in Corso Stalingrado 50 in Cairo Montenotte (SV).

Due to the saturation of available space, it acquired a share of a shed, also adjoining, where it transferred the car wrecking business by installing equipment for the rapid disassembly of vehicles.

The single site in Cairo Montenotte is equipped with a railway connection and structured with technologies for proper management of radiometric control and electronic weighing activities.

The organisation operates in the field of waste recovery, especially scrap metal, and in the field of industrial demolition and remediation.

The decision to seek official recognition for the good work carried out materialised in obtaining UNI EN ISO 14001 certification, with the issue of the certificate by the third party body RINA on 20/12/2007.

The organisation is also a member of the trade association Assofermet and is a fully qualified WEEE (Waste Electrical and Electronic Equipment) management company.

The development of the auto wrecking sector has enabled Vico s.r.l. to sign end-of-life car (E.L.V.) agreements directly with manufacturers and/or national exporters.

Vico is also active as a logistics platform operator. Goods from rail transport, and/or materials destined for companies producing goods and services and forwarded via carriers operating by road are acquired.

On 01/03/2010, the organisation acquired Certification in accordance with UNI EN ISO 9001:2008.

Since April 2010, the organisation has undertaken asbestos abatement activities by setting up dedicated external sites.

In July 2011, the organisation started up a new closed-circuit washing facility for hazardous and nonhydrocarbon and asbestos-contaminated special waste called 'Area 51'.

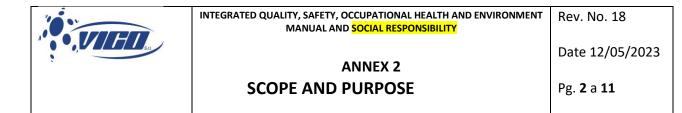
The plant takes the form of a concrete pad completely sealed off from the outside by a structure of preformed panels that encloses three of the four sides and the roof and is accessed through a motorised portal on the fourth side. The area is equipped with an internal air suction system sized to generate internal vacuum values in the order of 10 - 20 Pa so as not to allow dust and odours to escape during the reclamation work carried out inside.

The air sucked in through an extraction system equipped with absolute dust filtration is conveyed outside the hall where the confined area is located via a suitable chimney.

The chimney flows at the level of the roof of the Vico shed and has a sample intake made according to the specific UNI standards for the periodic control of emissions as per the provincial authorisation for atmospheric emissions.

The effectively oversized suction generates a flow of air through the passive inlets of the UDP and UDM and those located on the entrance roll-up door that is constantly directed from the outside to the inside of the confined area thanks to an internal vacuum that can be adjusted to values around 10 to 40 Pa





The internal vacuum level is constantly monitored by means of a digital differential pressure gauge, the sample socket of which was positioned halfway along the length of the plant and at the main inspection window.

A secondary extractor is connected to the main extractor to be activated in the event of an emergency due to malfunction of the first.

Both extractors are connected to a motor-generator to cope with possible power failures of the main grid. The decontamination plant in question is equipped with a decontamination unit for personnel specifically set up and used at every access and exit from the depressurised area. A material decontamination unit has also been set up, mainly used for decontaminating bags of waste coming out of asbestos reclamation, but which can also be used if necessary for decontaminating bags or big bags containing other types of waste.

The organisation has implemented within its EQS the quality management system according to EU Regulation No. 333/2011 art6.

The organisation has implemented within its EQS the quality management system in accordance with EU Regulation 715/2013 art 5. for the site in Corso Stalingrado 50 - 17014 Cairo Montenotte.

As of 01/02/2014, Organizzazione Vico srl realised a business branch lease of the company Dall'o' srl, (which was then finalised in January 2016 as a business branch sale), operating in the construction sector since the 1950s-60s.

This enabled the organisation to increase its SOA categories, as follows

- **1.** OG1 (Civil and industrial buildings)
- **2.** OG2 (restoration and maintenance of immovable property subject to protection under cultural and environmental heritage provisions)
- 3. OG3 (Roads, motorways, bridges, viaducts, railways, subways)
- 4. OG6 (aqueducts, gas and oil pipelines, irrigation and drainage works)
- 5. OG12 (remediation and environmental protection works and installations);
- 6. OS23 (demolition of works).

As of 03/07/2015, the Organisation obtained the Integrated Environmental Authorisation pursuant to PD no.2015/2853 issued by the Province of Savona with PD update no.2018/1685.

On 26/10/2016 the organisation acquired Certification under BS 18001:2007, and subsequently implemented the Uni EN ISO 45001:2018 standard on 25/10/2019.

As of February 2022, the organisation began the process of requesting a substantial modification with a simultaneous re-examination for the renewal of the AIA in its possession, with the competent territorial authorities (Region, Province, Municipality).

In September 2022, the above process was successfully concluded with the issuance of the new AUA No. 2399 authorisation dated 07/09/2022.

Starting in January 2023, the organisation embarked on the process of implementing a management system according to SA 8000:2014, which will be audited by a third-party certification body later this year.



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Starting in January 2023, the organisation embarked on the process for ISO 14064 and ISO 14067 certification, which will be audited by a third-party certification body later this year.

2. EXTERNAL, INTERNAL FACTORS AND RELEVANT STAKEHOLDERS

The organisation has identified the following factors belonging to the external context that may influence the performance of its system:

- Political Factors
- Economic Factors
- Social Factors
- Technological factors
- Legal factors
- Environmental Factors

The organisation has identified the following factors belonging to the internal context that may influence the performance of its system:

- People
- Resources
- Innovations and Ideas
- Marketing and Sales
- Operational Activities
- Finance
- Environment

The organisation has identified the following stakeholders that can influence the performance of its system:

- Customers
- Properties
- People of the Organisation
- Suppliers
- Control bodies (ASL, Arpa, VVFF)
- Supervisory bodies on voluntary regulations
- Pressure groups (trade unions, trade associations, political parties and movements, mass media)
- Competitors

Clients are mainly located in Italy; in the last three years, there has been an increasing tendency to work in

the Italian offices of multinationals, for which standards of occupational health and safety, quality of

services, and attention to the environment must be ensured.

3. <u>PROCESSES OF THE INTEGRATED MANAGEMENT SYSTEM QUALITY, ENVIRONMENT,</u> <u>SAFETY, SOCIAL RESPONSIBILITY</u>

ANNEX 2 SCOPE AND PURPOSE

Vico s.r.l. has adopted a process approach for its management system. By identifying the higherlevel processes within the company, and then managing each of them, the risk of non-compliant products/services identified during the final processes or after delivery is reduced. The organisation plans and carries out production and service delivery activities under controlled conditions consistent with the environmental aspects and significant impacts related to the organisation and occupational health and safety requirements.

Within the company's activities, two types of processes have been identified:

- a) **Primary** processes: processes that define the structure of the company, the main ones of which are:
- a.1 Commercial Process

[H]

- a.2 Production Processes
- a.3 Outsourced processes
- b) **Support processes:** processes that assist the primary processes in order to achieve customer satisfaction while respecting the environment.

4. <u>MATRICES OF CORRESPONDENCE INTEGRATED MANAGEMENT SYSTEM QUALITY,</u> <u>ENVIRONMENT, SAFETY</u>

a.1 Commercial Process

It is the process through which the company's production process begins and consists essentially of the initial contact with the customer and the drafting of the offer.

Code	Description	Reference document
<mark>0p</mark>	Commercial process	Procedure PG 03



INTEGRATED QUALITY, SAFETY, OCCUPATIONAL HEALTH AND ENVIRONMENT MANUAL AND SOCIAL RESPONSIBILITY

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a.2 Production Processes

They form the core of the production process and help to define the company in the market. The following production processes have been identified:

Code	Description	Reference document
1p	Demolition of production facilities and structural works	Procedure PO 07
2р	Remediation of polluted sites	Procedure PO 07
3р	Auto wrecking activities	Procedure PO 04
4р	Railway terminalling activities reclamation and demolition of railway wagons	Procedure PO 02
		PO Procedure 05
5р	Storage/storage activities	Procedure PO 01
		PO Procedure 05
6р	Collection and Transport of Waste and Material - Waste Intermediation without Holding and/or Trading in Waste	Driver's Manual
7p	Sorting, sorting, volumetric adjustment of non- hazardous metallic materials from industrial, craft and commercial process waste through the steps of pressing, shearing and punching	PO Procedure 05
8p	Design/planning	PG 13 Procedure
9p	Special technical processes (construction work, micropiling, core drilling) to support external site activities	Procedure PO 07
10p	Asbestos remediation	Procedure PO 07
11 p	Area 51 reclamation plant	Procedures PO 08
12 p	Construction and maintenance of civil, industrial and infrastructure works	Procedure PO 07

a.3 Outsourced processes

In the remediation of polluted sites, which includes asbestos remediation, and in the construction and maintenance of civil, industrial and infrastructure works, certain special and non-routine technical processes may be included, such as construction activities, core drilling, piling works, etc., for which a validation system is foreseen to demonstrate the ability to achieve the planned results (see OP 07). It is also possible for such technical processes to be outsourced.

In the remediation of polluted sites, asbestos abatement activities and the demolition of production facilities and structural works, a design phase inherent to the remediation and demolition plans is foreseen, if not provided by the client: certain aspects of this process relating to technical and design calculations may also be outsourced.



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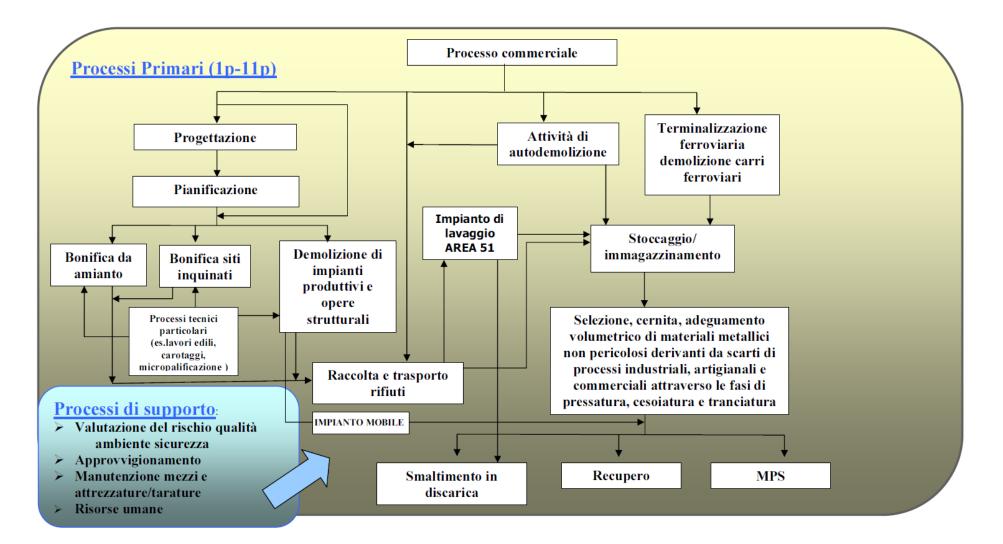
b) Supporting processes

The main supporting processes are

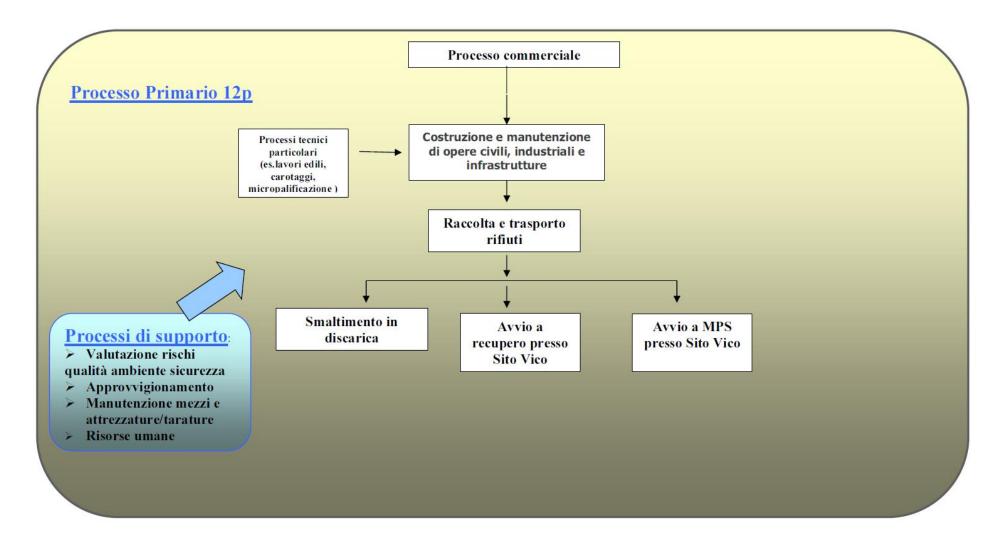
Code	Description	Reference document	
1 s	Means and equipment maintenance / Calibration	Procedure PO 03	
2s	Procurement	Procedure PG 06	
3s	Human resources management	Procedure PG 05	
4s	Quality Environment Safety Risk Assessment	MoQ, <mark>PdFC</mark> , <mark>PG16</mark>	

Below is a flow chart of the company's overall production process from which the interactions between the various processes can be deduced

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5. <u>CORRELATION MATRIX SA8000</u>

The table below shows the correlation between the processes, requirements of the SA8000 standard and the SA8000 Management System documents.

<mark>Code</mark>	SA8000 requirement	SA8000 Management System
		Documents
	Chapter 1 - Child Labour	ISTR_01 Child labour
	Chapter 2 - Forced or Compulsory Labour	ISTR_02 Forced labour
	Chapter 3 - Health and Safety	<mark>Risk Assessment Document (ex</mark>
l _		Legislative Decree 81/2208)
<mark>0p</mark>		
<mark>1p</mark>	Chapter 4 - Freedom of Association and the	ISTR_03 Freedom of association - right
	Right to Collective Bargaining	
<mark>2p</mark>	Chapter 5 - Discrimination	ISTR_04 Discrimination
L _	Chapter 6 - Disciplinary Practices	ISTR_05 Disciplinary practices
<mark>3p</mark>	Chapter 7 - Working Time	ISTR_06 Working hours
l _	Chapter 8 - Remuneration	ISTR_07 Remuneration
<mark>4p</mark>	Chapter 9 - Management System	
l _	 Chapter 9.1 - Policies, Procedures and 	Recruitment policy
<mark>5p</mark>	Records	
L _		Social Responsibility Policy
<mark>6p</mark>		
_		PG 00 Documented information SQA
7p		
_		PG 01 Preservation of QAS
8p		documented information:
		arrangements for its identification,
<mark>9p</mark>		collection, cataloguing, storage,
		protection, retrieval, retention, access
<mark>10p</mark>		and disposal
	 Chapter 9.2 - Social Performance Team 	PG 07Preventive actions , non-
<mark>11p</mark>		conformity management and
		corrective actions
<mark>12p</mark>	 Chapter 9.3 - Risk Identification and 	PG 16Analysis of the context and
	Assessment	determination of stakeholders.
a3		Determination of risks and
outsourced		opportunities
<mark>processes</mark>	 Chapter - 9.4 Monitoring 	PG 09Internal audits
	 Chapter 9.5 - Internal Involvement and 	PG 11Communication , participation,
	Communication	consultation

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2s 3s	 Chapter 9.6 - Complaint Handling and Resolution 	PG 07Preventive actions , non- conformity management and corrective actions
<mark>4s</mark>	 Chapter 9.7 - External Verification and Stakeholder Engagement Chapter 0.8 - Corrective and Proventive 	PG 07Preventive actions , non-
	 Chapter 9.8 - Corrective and Preventive Actions 	PG 07Preventive actions , non- conformity management and corrective actions
	 Chapter 9.9 - Training and Capacity Building 	PG 05 Staff Competence and Awareness - Tasks and Responsibilities
	 Chapter 9.10 - Management of Suppliers and Contractors 	PG 06Supply

6. <u>SCOPE AND PURPOSE</u>

The following Standards/Regulations are applied to the fields of activity listed in Chapter 6.1.

- UNI EN ISO 45001:2018
- UNI EN ISO 14001:2015
- UNI EN ISO 9001:2015
- ✓ EU Regulation No. 333/2011
- ✓ EU Regulation No. 715/2013
- SA8000:2014 Standard

6.1 FIELDS OF ACTIVITY

The Integrated Management System is applied to the following fields of activities:

- DESIGN AND IMPLEMENTATION OF DEMOLITION OF PRODUCTION FACILITIES AND STRUCTURAL WORKS.
- RECLAMATION OF POLLUTED SITES.(*)
- PLANNING, CARRYING OUT REMEDIATION OF ARTEFACTS, EQUIPMENT, COMPONENTS AND HAZARDOUS AND NON-HAZARDOUS SPECIAL WASTE CONTAMINATED WITH ASBESTOS, HYDROCARBONS AND OTHER POLLUTANTS, ON SITE AND/OR AT FIXED PLANT IN THE COMPANY KNOWN AS 'AREA 51', AND RELATED ACTIVITIES OF STOCKPILING, RECOVERY AND/OR DISPOSAL.
- > WASTE BROKERING WITHOUT POSSESSION AND/OR WASTE TRADING
- WASTE MANAGEMENT ACTIVITIES: WASTE BROKERAGE WITHOUT POSSESSION AND/OR TRADE; COLLECTION, TRANSPORT (ON ITS OWN ACCOUNT AND ON BEHALF OF THIRD PARTIES), TREATMENT AND RECOVERY OF SPECIAL URBAN AND INDUSTRIAL, FERROUS AND NON-FERROUS,

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HAZARDOUS AND NON-HAZARDOUS

WASTE, WITH SORTING, WEIGHING PACKAGING AND STORAGE OF MPS;

- VOLUMETRIC ADJUSTMENT OF NON-HAZARDOUS METALLIC MATERIALS FROM INDUSTRIAL, ARTISANAL AND COMMERCIAL PROCESS WASTE THROUGH THE STEPS OF PRESSING, SHEARING AND STAMPING;
- CLEARANCE AND DISMANTLING OF VEHICLES, INCLUDING ROLLING STOCK AND MILITARY VEHICLES;
- TERMINISATION OF RAW MATERIALS, HAZARDOUS AND NON-HAZARDOUS, FROM RAILWAY WAGON TO ROAD TRAILER AND VICE VERSA, THROUGH THE PHASES OF: UNLOADING, HANDLING, STORAGE AND PRODUCT LOADING.
- CONSTRUCTION AND MAINTENANCE OF CIVIL AND INDUSTRIAL BUILDINGS AND RELATED ELECTRO-ELECTRONIC AND THERMO-HYDRAULIC INSTALLATIONS AND EXTERNAL WORKS.

7. EXCLUSIONS

All points of the standard are applicable.

As far as Design is concerned, the point is partially applicable in relation to the activities of construction of civil and non civil buildings, since the Organisation, in addition to intervening on the works against drawings issued, verified and approved by the client and without interfering with the projects carried out by the parties concerned, has assessed the risk of not being fully applicable against actions implemented to mitigate this risk (such as activities carried out in full compliance with the requirements of 8.1, 8.2 and 8.5 and the relative internal and external competences used for the correct management of incoming/outgoing information throughout the duration of the management of the orders.