



**POLICY**  
**HEALTH AND SAFETY IN THE WORKPLACE**  
**OF**  
**A.S. ROMA S.P.A. (THE "COMPANY")**

**In force from December 7, 2021**



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Società Soggetta ad attività di direzione e coordinamento da parte di NEEP Roma Holding S.p.A.

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## 1. Scope of the Policy

- 1.1. The purpose of this “*Policy for health and safety at work*” (the “**Policy**”) is to identify the principles and objectives of the Company in the field of health and safety in the workplace with a view to guaranteeing the well-being of all Recipients (as defined below), meaning a state of physical, mental and social satisfaction, not consisting only of a absence of disease, injury or infirmity.
- 1.2. The Policy also plays a guiding role in defining programs and concrete actions aimed at guaranteeing the protection of health and safety in the workplace, also by identifying the principles of action and objectives, with a view to promoting the well-being of all. the Recipients.
- 1.3. The Policy must be considered an integral and substantial part:
  - 231 Model (as defined below);
  - the Safety Management System (as defined below) and the Risk Prevention and Protection Service (as defined below).

## 2. Application

- 2.1. This Policy applies to all those who act in the name and/or on behalf of the Company, including, by way of example, directors, statutory auditors, employees, managers, officers, consultants and suppliers, athletes and registered staff, technical and medical staff and anyone else who lends their business to the Company.

## 3. Definitions

The following definitions apply to this Policy:

- “**CEO**” means the Chief Executive Officer of the Company;
- “**Employer**” means the person in charge of the employment relationship with the worker or, in any case, the person who is responsible for the organization of the Company, as identified by art. 2 of Decree 81 (as defined below)
- “**231 Decree**” means the Legislative Decree of June 8, 2001, no. 231;
- “**81 Decree**” means the Legislative Decree of April 9, 2008, no. 81;
- “**Guidelines**” means the acts of guidance and coordination for the application of the legislation on health and safety prepared by Ministries, regions, INAIL and approved at the Permanent Conference for relations between the State, the regions and the autonomous provinces;

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“**Competent Doctor**” means the doctor in possession of one of the qualifications and the training and professional requirements referred to in Article 38 of Decree 81 who collaborates with the Employer for the purposes of risk assessment and appointed by the Employer to carry out health surveillance and for all other tasks envisaged by Decree 81;

– “**231 Model**” means the organizational model of the Company adopted pursuant 231 Decree;

– “**Supervisory Board**” means the Supervisory Board appointed within the Company nominato pursuant to 231 Decree and 231 Model;

– “**Workers' Safety Representatives**” means those who have been appointed or designated as “*Workers' Safety Representatives*” with regard to aspects of health and safety in the workplace. in accordance with the provisions of Decree 81;

– “**RSPP**” or “**Responsible of services of prevention and protection**” means the person appointed by the Employer to coordinate the Risk Prevention and Protection Service (as defined below);

– “**SGSL**” or “**Workplace Safety Management System**” or “**System**” means the corporate organizational system as a whole aimed at guaranteeing the achievement of the health and safety objectives identified and consistent with the applicable regulatory discipline, best practices and international standards;

– “**Health Surveillance**” means the set of medical documents aimed at protecting the health and safety of workers, in relation to the work environment, professional risk factors and the methods of carrying out the work activity;

– “**SPPR**” or “**Risk Prevention and Protection Service**” means the set of people, systems and means external or internal to the Company aimed at preventing and protecting workers from occupational risks.

#### 4. Principles

4.1. This Policy identifies the fundamental principles regarding the protection of health and safety in the workplace adopted by the Company.

4.2. The Company, in matters of health and safety in the workplace, is inspired in particular by the following fundamental principles:

- a) full compliance with the legislation, including supranational legislation, as well as the applicable collective bargaining, on the subject of health and safety in the workplace;
- b) consistency of the action with international principles on health and safety at work in order to align the Company's internal models and procedures with the best practices on the subject;
- c) pursuit and protection of the health of all Recipients, as defined in Decree 81 that is, as a “*state of complete physical, mental and social well-being, not consisting only in the absence of disease or infirmity*”;

- d) definition of purposes, and related programmatic activities, in the field of health and safety in the workplace aimed at the best pursuit of a level of health and safety consistent with best practices, including international ones on the subject;
- e) identification of the specific activities to be implemented to allow the pursuit of the objectives identified in the field of health and safety in the workplace through the implementation of the planned programmatic activities;
- f) constant evaluation of the adequacy and effectiveness of programmatic activities with a view to achieving the objectives set in the field of health and safety at work;
- g) monitoring and verification of the concrete implementation methods of programmatic activities, also by identifying persons appointed for this purpose with suitable powers to allow the proper performance of the control and verification tasks entrusted to them, including autonomous powers of initiative;
- h) identification of the Supervisory Board as the main interlocutor of the persons in charge of control and verification activities and definition of an effective reporting system that allows a complete and timely information flow between the Supervisory Board and the aforementioned persons;
- i) monitoring activities on the effective implementation of the principles contained in this Policy by the competent functions of the Company also through the adoption of specific policies and procedures aimed at concretely implementing the above principles.

## 5. The control system for occupational health and safety

- 5.1. In compliance with the regulations in force and the prerogatives attributed to him by the law, as well as in accordance with the rules and principles set out in the applicable collective bargaining, as part of the Workplace Safety Management System, the Employer will respect at least the following requirements that:
- a) suitable technical and organizational solutions are adopted to ensure high levels of prevention and protection of health and safety at work in order to allow responsible and integrated management of the System, based on the continuous improvement of the levels of protection, even in the most transversal of organizational well-being, management and reduction of phenomena related to stress and violence against personnel;
  - b) that a systematic and continuous assessment methodology is adopted for occupational risks and the relevance and significance of the impact of undesirable events, in order to eliminate / reduce accidents and illnesses at work, also through the historical analysis of accidents and events accidental;
  - c) adequate prevention and protection measures are identified with respect to the risks encountered, so that they are eliminated or reduced to a minimum with consequent limitation to a minimum of the number of workers exposed to risks;

- d) a periodic verification of the consistency of the system of delegations and powers of the Company with the provisions of art. 16 of Decree 81 as well as with the provisions of the 231 Model on the subject, also through the implementation of supervisory and monitoring activities by the functions already subject to delegation;
- e) adequate collective and individual protection measures are defined, it being understood that the former must have priority over the latter;
- f) the Health Surveillance of workers is guaranteed according to specific risks;
- g) prevention is planned, aiming at a complex that coherently integrates the technical and production conditions of the Company with the influence of environmental factors and work organization, as well as the subsequent implementation of the planned interventions;
- h) environments, equipment, machines and systems are constantly maintained, with particular regard to the maintenance of safety devices in compliance with the manufacturers' instructions;
- i) adequate resources are allocated (human, technological and economic) aimed at allowing the effective implementation of this Policy and the underlying strategic and operational objectives;
- j) staff and their representatives (and, in particular, the Workers' Safety Representatives) are consulted and involved in order to obtain commitment in the implementation of the Policy by all the actors of the System, defining clear procedures and paths and shared with all the subjects involved (RSPP, Competent Doctor, etc.);
- k) objectives set and the results achieved are made known to all the subjects involved in the System and to the Recipients, with particular regard to the employees of the Company as well as to their representatives (and, in particular, the Workers' Safety Representatives);
- l) the comprehensibility, implementation and regular updating of this Policy and related internal policies and procedures is ensured;
- m) periodic meetings are organized (also pursuant to art.35 of Decree 81), at least every six months, between the Employer, the RSPP, the Company Doctor and the Workers' Safety Representatives in order to verify correct compliance of the accident prevention and safety regulations. A special report must be drawn up for these periodic meetings to be made available to the Supervisory Body;
- n) the personnel subjected to Health Surveillance is periodically subjected to control visits, without prejudice to any further visits required by specific contingencies;
- o) that Responsabile of SGSL reports periodically and, in any case, at least every three months, to the Employer and the Supervisory Board about the implementation status of the SGSL.

- 5.2. In any case, the System must provide for the precise definition of the tasks, duties and responsibilities of each category of persons involved, starting from the Employer up to the individual worker.
- 5.3. In this regard, the following profiles must also be considered:
- a) skills and training of the employees;
  - b) organization of work and workstations;
  - c) acquisition of goods and services used by the company and the communication of appropriate information to suppliers and contractors;
  - d) ordinary and extraordinary maintenance of the equipment, systems, means of prevention and collective and individual protection devices;
  - e) skills and recruitment of the suppliers and contractors;
  - f) efficient management of emergencies;
  - g) methods to be followed in order to address the discrepancies found with respect to the objectives set and the forecasts of the System.
- 5.4. The information flow system must allow the circulation of information within the Company, in order both to foster the involvement and awareness of all those involved in the System, within the limits of their respective roles, functions and responsibilities, and to ensure timely and adequate evidence of any deficiencies or violations, as well as of the interventions necessary for its updating.
- 5.5. Also in the context of Model 231, the Company must prepare an effective and efficient control system, as well as providing for the recording of the checks carried out by the Company, also through the preparation of specific reports. This control system must include a safety monitoring mechanism that develops on a double level:
- the first which must involve all the subjects operating within the organizational structure of the Company;
  - the second, expressly referred to by the legislation, which will be carried out by the Supervisory Board, which must be assigned the task of verifying the effective functionality of the overall preventive system adopted by the Company to protect the health and safety of workers.
- 5.6. In order to allow the Supervisory Board to effectively carry out second-level monitoring, the obligation to send the SB a copy of the periodic reports on health and safety in the workplace (and, in particular, the minutes of the periodic meeting of art. 35 of Decree 81 as well as all data relating to accidents at work that occurred).
- 5.7. The results of the monitoring will be considered by the Supervisory Board for the purposes of any formulation to the Employer, or to the competent corporate functions, of proposals for updating and / or integrating the System.

## **6. Relations with 231 Model**

- 6.1. Once the company risks relating to health and safety in the workplace have been identified, it will be necessary to prepare specific control protocols aimed at eliminating or reducing the risks to an acceptable level.
- 6.2. In particular, the Company must prepare at least the following protocols:
  - a) organizational system;
  - b) operational management, the safety monitoring system;
  - c) ethic code;
  - d) communication and training on health and safety at work;
  - e) disciplinary system.
- 6.3. The content and specific aspects characterizing each of the aforementioned protocols will be developed and contained in Model 231.

## **7. Reporting and monitoring**

- 7.1. Each Recipient can and must report any violations of this Policy to the Company's Legal & Compliance Department by e-mail. In any case, the Company's Legal & Compliance Department ensures the confidentiality of the report, unless the disclosure of the identity of the whistleblower is required in accordance with the provisions of the law or on the basis of applicable policies or for disciplinary proceedings of particular relevance.
- 7.2. The Company will not tolerate any form of retaliation against anyone who has reported violations; any violation of the prohibition of retaliation against reporting subjects will be punished according to the disciplinary provisions in force (pursuant to the law and the applicable collective bargaining). Each Recipient may also contact the Company's Legal & Compliance Department in order to obtain clarifications with reference to this Policy.
- 7.3. The Company periodically checks the effective implementation of this Policy, also by evaluating the reports referred to in the previous paragraph.

## **8. Training**

- 8.1. The Company organizes, in addition to the training interventions conducted pursuant to Model 231, a specific training activity aimed at spreading knowledge of the legislation referred to in Decree 81, of this Policy and, in general, of the Workplace Safety Management System.
- 8.2. This training activity, which may also include the involvement of professionals external to the Company, must be differentiated, in terms of content and delivery methods, according to the qualification of the Recipients.



## 9. Dissemination and updating

- 9.1. This Policy is communicated to all Recipients, also through proper and specific training sessions, and is made available on the company intranet site.
- 9.2. This Policy will be evaluated for the purpose of updating at least once every two years, also in light of the evidence emerging from the reporting and monitoring activities referred to above.