QHSE MANUAL
(Quality, Health, Safety, and Environment)

REV.	DATE	DESCRIPTION	ARRANGED	APPROVED
00	01.01.2021	New issue for system integration	C-QSE-MGR	C-HRQ-DIR

TABLE OF CONTENTS

1. INTRODUCTION TO THE QHSE MANUAL

This manual describes the organization of Rizzani de Eccher and the QHSE Management System aimed at developing, implementing and maintaining a system that complies with the requirements of international standards:

- ISO 9001: 2015 - Quality Management System;

- ISO 45001: 2018 - Occupational health and safety Management System;

- ISO 14001: 2015 - Environmental Management System;

The certificates of compliance of the above international standards, issued by the certification bodies, have the following purpose and scope:

"Management of general contractor activities carried out in accordance to TITLE III of Legislative Decree 50/2016 coordinated with the corrective Legislative Decree 56/2017 e s.m.e i., for the design and construction of civil and industrial engineering works, bridges, viaducts and mobility infrastructures."

This manual provides to the employees and external parties, with a practical guide on the structure of the QHSE Management System, on the main areas of it, and on the related documents to be used to cover every organizational need and standard requirement.

The manual was also designed in order to allow external stakeholders to understand its characteristics, to add information about it, and to facilitate the knowledge of the company during the various company interactions such as audits, and tenders.

Hence, the manual identifies the most important documents such as policies and references to system documents which are developed on a standard criterion. This action is now easier considering the new common high-level structure (framework) implemented on all new international standards.

The manual also contains some information on the Italian organization and the context in which it operates. Information on the companies controlled by the de Eccher Group are normally included in the local / project documents or in the Management Systems of its subsidiaries.

The manual, as it is a component of the system, it applies to all company activities that could affect the environment, the health and the safety of all workers belonging to the organization, as well as the quality of the services and products provided, without any exclusion.

The guidelines contained in the manual apply to all company activities, wherever they may be, in particular to the processes relating to the construction projects, in compliance with the specifications of public and private bodies and with applicable laws and regulations.

Ultimately, it is presented a summary table which aims to frame the entire organizational unit system by providing for each management process the activities carried out, the responsibilities, the inputs, the outputs and the documents referred to the system.

2. COMPANY OVERVIEW

2.1. Administrator Data

Name	Rizzani de Eccher S.p.A: Joint Stock Company
Share Capital	Euro 20,000,000 fully paid up
Member, Chamber of Commerce of Udine Dept.of Foreign Trade UD	R.E.A. n° 115684
Companies Registry Udine	002577
Tax I.D. and VAT Number	IT00167700301
Headquarters:	Via Buttrio, 36 fraz. Cargnacco, 33050 Pozzuolo del Friuli (Udine)
E-mail	mail@rde.it
Web site	www.rizzanideeccher.com

2.2. History

1831 Rizzani is established in Udine, as a general contracting and construction company. Within a few years, it earns a prestigious reputation for carrying out large engineering projects in Italy and in several countries in Africa, Asia and Latin America.

1948 Riccardo de Eccher establishes a construction company bearing his name, in the North Eastern Italian region of Trentino Alto Adige; The Company begins to develop real estate.

1970 Riccardo de Eccher takes over Rizzani, combining the experience and skills of the two companies in a new company, Rizzani De Eccher, managed by the de Eccher family. The merger and integration process of these two companies was completed in the early 1970s, laying the foundations for the current corporate structure.

1976 The second generation of the de Eccher family joins the management and the Company expands its focus and market share in infrastructure projects and public works. Following a devastating earthquake in the Friuli region in the same year, the Company's resources are immediately devoted to the reconstruction process, including the careful restoration of historical landmarks such as the medieval town of Venzone. This prestigious recovery and rehabilitation project required the meticulous and identical reconstruction of ancient architectural features.

1980 The construction of two large sections of the Carnia-Tarvisio highway provides the Company with the opportunity to develop innovative construction techniques for the prefabrication and erection of pre-cast concrete segments. The latter technology is further developed in the following years, as the Group completes many important highway and motorway projects. This invaluable technological expertise is eventually consolidated with the establishment of Deal, a company dedicated to vanguard technologies for the construction of elevated bridges and viaducts, utilising mass-production industrialised systems.

1982 Towards the end of this year, Rizzani de Eccher wins its first large international tender for the construction of five school complexes in Algeria. Two years later, the Company is awarded a further five projects for the construction of two tanneries and three shoe factories in the former Soviet Union. This initial success ushers in a period of significant growth in Russia, which continues to this day.

1986 Thanks to the courage and commitment of the de Eccher family, aided by a bright and talented management team, the Group posts an extraordinary growth in turnover, topping revenues of 228 billion Italian liras in 1990, up from 37 billion liras in 1986.

2004 Rizzani de Eccher consolidates its success at home and abroad. It becomes one of the ten leading construction companies in Italy and is also listed among the Top 100 International Contractors by Engineering New Record magazine.

2005 Thanks to its consolidated position in several countries (such as Russia and other CIS countries, the Middle East, East Asia, North and Central America as well as Africa) the Group's share of turnover from overseas operations has always been above 70% since 2005.

2010 With the acquisition of the "South Road Superway" in Adelaide, Australia, the Group extends its presence in Oceania and the Pacific.

2017 For the first time, the Group's revenues exceed one billion euros.

Today, The Group is one of the world's leading construction companies and market leaders in its sector, operating in four areas of activity with specialized and innovative know-how: general construction, infrastructure construction, engineering services, cutting edge solutions for bridges and viaducts, and real estate development. The Group continues the expansion into new geographic areas with high potential and consolidates its position in those areas in which it already operates thanks to the continuous search for efficiency and technological performance to guarantee quality and reliability in delivering its final products to its customers.

To achieve these results, the Group places great emphasis on its organization, thus placing its people and processes as its founding pillars. In an industry characterized by markedly tangible aspects, the Group instead chooses to focus on intangible aspects, such as the skills of its human resources and the efficiency of its processes, in order to provide customers with a swift response time and a manufacturing quality well above average.

Additionally, the Group pays great attention to a critical aspect: The development of its Human Resources. The Group as a matter of fact focuses on the development of its internal resources with the aim of increasing the specific and necessary skills so that the same resources are able to operate in particular areas or markets in which the Group operates. This takes place through a careful selection process, targeted tutoring (including through the Master programme organized with the University of Udine and the University of Trieste) and a constant investment in training and personal growth.

In recent years, the Group has directly hired resources in the countries in which it operates, in order to fully integrate into the local environments, by doing so improving its efficiency and effectiveness. The optimization of processes also ensures better coordination within the project teams, as well as between the headquarters and the same project teams.

2.3. Organizational Structure

Rizzani Eccher is the leading company of the de Eccher Group. It provides guidance and services to all other branch offices, companies and subsidiaries of its organization.
There are several companies belonging to the de Eccher Group.
The following image summarizes and identifies some of the relevant companies within the Gruppo de Eccher.

2.4. Headquarters

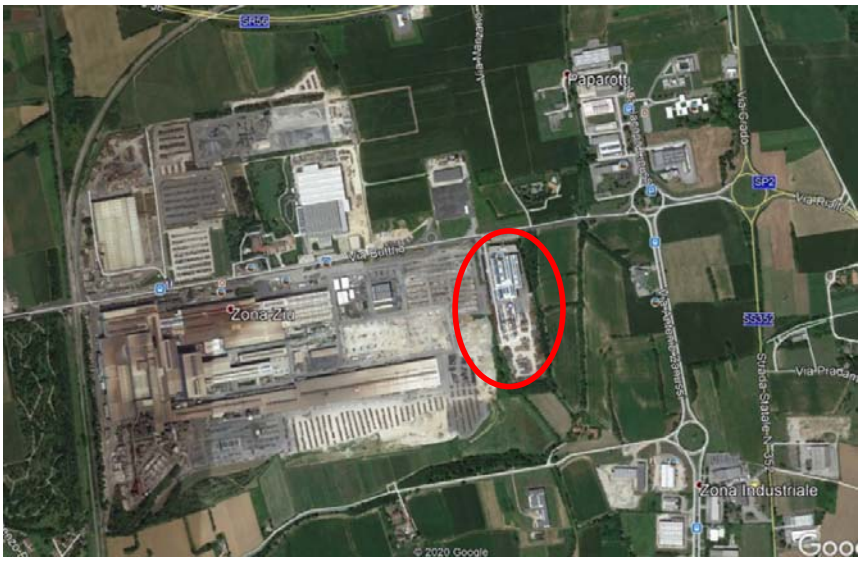
The company's headquarters houses nearly 200 employees and is located in the southern industrial area of Udine just 10 minutes by car from the city centre.

The board of directors and the main departments (Human Resources, QHSE, buyers, A&F, Tenders office, etc.) are based in a 4-storey building on a large property of over 50,000 square meters.

Adjacent to the main office building there is an industrial plant that houses the main Rizzani de Eccher warehouse which manages the most important logistical operations that supports the entirety of all Italian and foreign construction sites of the de Eccher Group.

Moreover, there is also to be found the DEAL office where key components of their special lifting equipment are produced, tested, packed and shipped.

In the entire area are present various industrial activities. More particularly, on the west side of the property there is one of the largest Italian steel and rolling mills (ABS S.p.A. owned by Danieli Officine S.p.A.). The South and East side sees other types of industrial activities. The A4 motorway is just 5 minutes away and is a strategic point for the management of transport to and from the Rizzani de Eccher headquarters. The following image gives an overview of the area and of the property owned by the company.



The following image depicts the property owned by the company with an identification of the main areas and buildings.

The 4-storey building that houses the main offices is identified by the red polyline.

The central warehouse and the DEAL factory (9000sqm) are identified by the green polyline.

The external logistics area and the outdoor warehouse of 40,000 square meters are identified with the orange polyline.

The parking area and the remaining properties are identified with the blue polyline.

2.5. Branch offices

In recent years, several branch offices have been set up to adequately support local activities. The most representative are found in:

- Miami, USA (Americas);
- Moscow, Russia (Europe);
- Algeri, Algeria (Africa);
- Luxembourg (Europe),
- Doha, Qatar (Asia);
- Perth, Australia (Oceania).

Branch offices aim to provide support to the needs of the company in that given area as well as to provide expertise on applicable local obligations. The key departments have a local manager and a different number of resources depending on the amount of business the company has in that specific area. Local consultants are normally tasked with supporting internal resources.

3. TERMS, CONDITIONS & ABBREVIATIONS

(§ 3 14001 - § 3 45001 - § 3 9001)

3.1. Terms and conditions

This Manual is subject to the definitions and terminologies indicated in § 3 of the reference ISO Standards (9001, 45001 and 14001), which can be consulted at the following intranet address \\svrscmfs1.sacaim.rde.com\Uffma\Sicurezza\Sicurezza Pubblica\Prescrizioni\. The main ones are summarized below:

P.N.	*Term*	*Definition*
3.1.1	Top Management	Person or group of people who, at the highest level, lead and manage an organization.
3.2.1	Organization	Person or group of people that are dynamically connected and coordinated with each other, that work with responsibility, authority, and relationships to achieve their goals.
3.3.1	Improvement	Working activity to increase performance.
3.3.2	Continual Improvement	Continual working activity to increase performance. Note: The process of defining objectives and identifying opportunities for improvement is an ongoing process that uses audit findings, audit conclusions, data analysis, management reviews or other means and it generally involves corrective actions or preventive actions.
3.3.5	Planning	Part of the management focused on establishing objectives and specifying the operational processes and the related resources necessary to achieve those objectives.
3.3.7	Control	Part of the management focused on fulfilling the required requirements.
3.4.1	Process	Set of interrelated or interacting activities that use inputs to deliver an expected result.

3.4.5	Procedure	Specific method to carry out an activity or a process.
3.5.8	Policy	Orientations and guidelines of an organization expressed formally by its Top Management.
3.7.1	Objective	Result to be achieved.
3.7.6	Product	Result of an organization's process that can be carried out without any transaction taking place at the interface between the organization and the customer.
3.7.9	Risk	Effect of the uncertainty on the objectives, obtained from the products of Probability (P) Damage (D) Relevance (R). Uncertainty is the state of a lack of information relating to the understanding or knowledge of an event, of its consequences or of its probability.
3.7.10	Efficiency	Relationship between the result achieved and the resources used.
3.7.11	Effectiveness	Degree of implementation of planned activities and achievement of planned results.
3.8.6	Documented information	Information that must be kept under control and preserved by an organization. They can be in any format, in any medium, and come from any source.
3.8.8	Manual	Document that establishes requirements for the Management System of an organization.
3.13.1	Audit	Methodical, independent and documented process in order to obtain objective evidence with an impartial evaluation, in order to establish to what extent the audit criteria are met.
3.13.7	Audit criteria	Set of policies, procedures or requirements, used as a reference, against which objective evidence is compared.

3.2. Abbreviations

The RdE structure has different levels of organizational management, according to what is identified in the Company Organization chart, from which the methods for assigning the name of each identified position is derived. Within the manual and procedures, each procedure is referred to by an acronym, identified within the operating instruction **A-0000-RDE-CMS-IST-01-01-Abbreviazioni e codifica documenti.**

In the case that the procedures are applicable to several levels (Corporate, Area, Project...) the functions involved will be referred to by means of a simplified string consisting of the acronym of the office.

The following table shows the acronyms used in the procedure.

Codice	Descrizione
A-OPE-DIR	Area-Operations-Director
C-A&F	Corporate-Administration and Finance-Office
C-ADM-MGR	Corporate-Administration and Finance-Manager
C-CPI	Corporate-Control Procur & Plant, IT-Office
C-D&M	Corporate-Development and Marketing-Office

C-DEV-EXD	Corporate-Development Executive-Director
C-EXC	Corporate-Executive Committee Group
C-HRO	Corporate-HR & Organization-Office
C-HRO-MGR	Corporate-HR, Organization – Manager
C-HRQ-DIR	Corporate-HR, Organization & QHSE-Director
C-LEG	Corporate-Legal-Office
C-MGM-EXD	Corporate-Management-Executive Director
C-OPE-EXD	Corporate-Operations-Executive Director
C-QSE	Corporate-QHSE (Quality Health and Safety, Environment) Office
C-QSE-MGR	Corporate-QHSE (Quality Health and Safety, Environment)-Manager
C-SUB-EXD	Corporate-Subsidiaries-Executive Director
C-TES	Corporate-Technical Services-Office
P-OPE-MGR	Project-Operations-Manager
P-QSE	Project-QHSE (Quality Health and Safety, Environment)-Office

4. CONTEXT OF THE ORGANIZATION

4.1. Understanding the organization and its context

(§ 4.1 9001 - § 4.1 45001 - § 4.1 14001)

The organization and context of Rizzani de Eccher are divided into two macro-groupings:

The headquarters activities, characterized by the offices, the warehouses and the mechanical-electrical factories, are developed within the context of Via Buttrio 26 (company headquarters). The external and internal factors relevant to the implementation of the system are examined C-QSE. These are collected and recorded in the Risk Assessment Documents, in the Environmental Management Plan, and in the Corporate Quality Plan and in its related attachments. These internal and external factors are reviewed at least once a year during the Management Review.

The Production Units (construction sites) are also diversified as they are located in different contexts (eg location, branch, joint venture, stakeholders, etc.). The external and internal factors relevant to the implementation of the system are collected in the "QHSE Plan", prepared at the start of the activities and reviewed in case of changes to the context.

4.2. Understanding the needs and expectations of workers and parties involved.

(§ 4.2 14001 - § 4.2 45001 - § 4.2 9001)

The organization is divided as follows:

C-QSE establishes the applicable requirements of the engaged parties relevant to the QHSE System, which are inherent to the activities carried out at the company headquarters and those arising from other branch offices.

The Heads of the Production Units (Construction Sites) assigned to them, determine the requirements of the interested parties of the activity that will affect the Project, the prescriptive ones of the project to be implemented and those imposed by the company's policy and procedures.

These analyses are reported in specific office and construction site documents , which are related to the safety, the environment and quality.

Specific software identifies the requirements requested by the parties involved or from applicable legal requirements, and they manage their expiration and controls; two among all: "Legal Requirements (\\svrscmfs1.sacaim.rde.com\Uffma\Sicurezza\Sicurezza Pubblica\Prescrizioni\Prescrizioni Legali.accdb) and "Compliance Register" (\\svrfs2013\f1\areaitalia\Commesse\905 - sede magazzino\RDE-Registro Adempimenti.accdb).

4.3. Application field

(§ 4.3 14001 - § 4.3 45001)

The application field of the Management System consists of the entire productive organization of RdE, and it includes activities that are carried out at the company headquarters as well as activities at external and temporary production sites.

The company operates in various sectors:

- civil works;
- industrial, hospitality and agricultural works;
- restoration works;
- infrastructures and purification plants;
- roads and bridges;
- irrigation and other structues;
- maritime works;
- metal carpentry;
- real estate and personal property projects, project financing;
- civil works for networks and telephone systems.

The company operates both on the national territory and in many areas of the globe.

Specifically, the application field of the certification is:

Management of the general contractor activities carried out in accordance to Title III of Legislative Decree 50/2016, and in accordance to the corrective Legislative Decree 56/2017 s m i, for the design and construction of civil and industrial engineering works, bridges, viaducts and infrastructural works for mobility.

4.4. Management System

(§ 4.4 14001 - § 4.4 45001 - § 4.4.1 and 4.4.2 9001)

The Management System model, illustrated in the following figure, represents the connections between the various processes of parts of the organization. From a generalized connection, located within the company (external flow-chart), we move on to planning and detailing the company activity in every single relevant process (internal flow-chart). The characteristics of the Management System are described below with respect to the requirements of the reference standard.

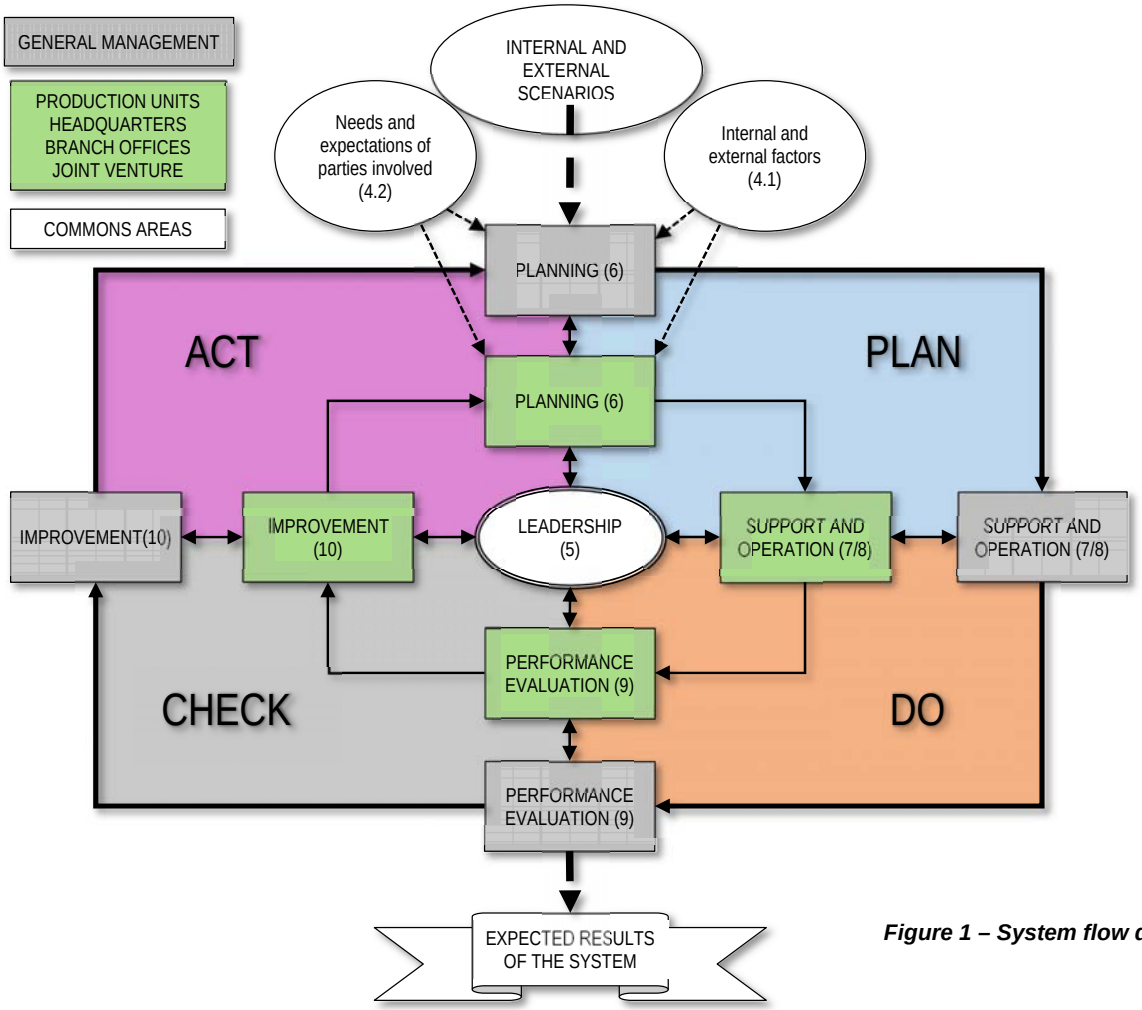


Figure 1 – System flow diagram

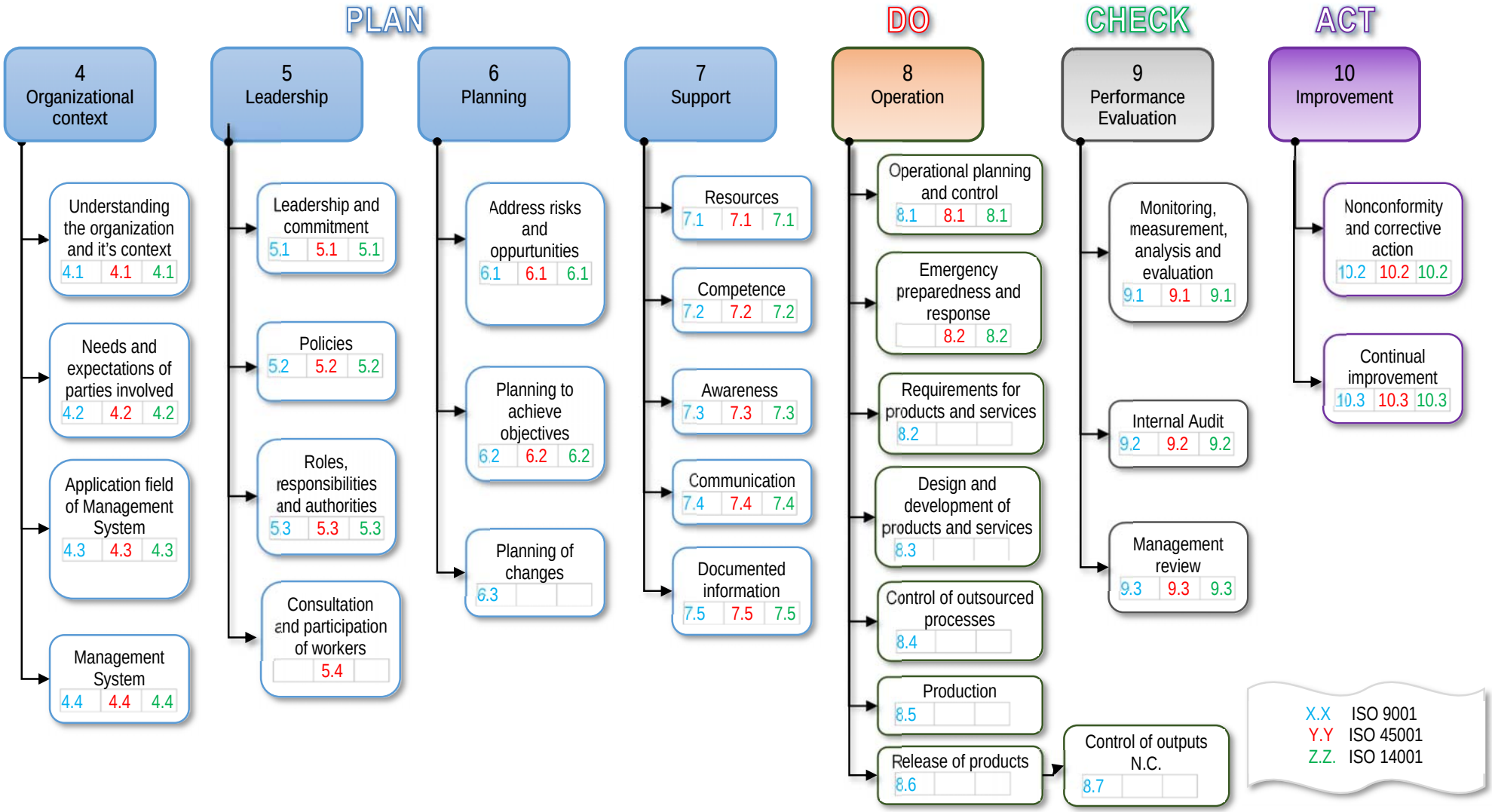


Figure 8 – Management System Standard Scheme.

5. LEADERSHIP

5.1. Leadership & commitment

(§ 5.1 14001 - § 5.1 45001 - § 5.1 9001)

The Board of Directors has appointed its Management Systems representative (hereinafter C-HRQ-DIR) and has identified the operating structure made up of the operating units and their Area Managers; these subjects constitute the Top Management.

The Top Management identifies itself with the Corporate-Executive Committee Group (hereinafter C-EXC) which developed and implemented the Management System.

The Top Management demonstrates leadership and commitment towards the Management System in order to certify its compliance with the requirements of the international standard:

- by taking full responsibility for the effectiveness of the Management System;
- by taking full responsibility, obligation and account for the prevention of work-related injuries and diseases, as well as the provision of safe and healthy workplaces and activities;
- by ensuring that the policy and objectives relating to the Management System are established and that they are compatible with the context and with the strategic guidelines of the organization;
- by ensuring the integration of the Management System requirements into the organization's business processes;
- by promoting the use of the process approach and risk-based thinking;
- by ensuring the availability of the resources necessary for the management System;
- by communicating the importance of effective management, and compliance with the requirements of the Management System;
- by ensuring that the Management System achieves the expected results;
- by actively involving, guiding and supporting the workers and other parties involved, so that they contribute to the effectiveness of the Management System;
- by developing, guiding and promoting a culture in the organization that supports the expected results of the Management System;
- by promoting and ensuring improvement;
- by providing support to other relevant management roles to demonstrate their leadership in order to apply it to their respective areas of responsibility;
- by protecting workers from retaliation following the report of accidents, dangers, risks and opportunities;
- by ensuring that the organization establishes and implements a process or processes for worker consultation and participation;
- by supporting the establishment and operation of the health and safety committees.

In addition, the Top Management demonstrates leadership and commitment by having a customer focused approach, ensuring that:

- the customer's requirements and the applicable mandatory requirements are determined, understood and regularly met;

REV.	DATE	DESCRIPTION	PREPARED	APPROVED
00	01.01.2021	New Issue for System Integration	C-QSE-MGR	C-HRQ-DIR

- the risks and opportunities that may affect the conformity of products and services and the ability to increase customer satisfaction are determined and addressed;
- the focus on increasing customer satisfaction is maintained.

The Top Management commits to continuously increase the effectiveness of the Management System, by communicating to the entire organization the importance of satisfying the expectations of the interested parties (eg. Clients, suppliers, workers, population and others) and the implementation of legal requirements and other applicable company activities.

Considering the complex and vast company organization, in order to govern the various business processes, also located in different contexts (countries, cultures, traditions), C-EXC has decided to divide the leadership among its employees.

The transfer of powers and responsibilities to the various top managers of the company is conferred by a delegate, following a specific resolution of the C-EXC. For more details see procedure A-0000-RDE-CMS-PRO-02-01-Leadership.

Each delegate ensures the implementation of the Management System established by the Top Management and, where possible, enhance its performance by identifying the improvement proposals that will constitute any input elements for a subsequent review.

5.2. Policies

(§ 5.2 14001 - § 5.2 45001 - § 5.2.1, 5.2.2 9001)

The Top Management has established and enacted some policies within which to develop its own business and business strategies.

The documents include and underline the values, the vision and the commitment of the C-EXC to preserve the environment, to promote the health and safety of all members of its Organization. Moreover, the documents emphasize the dedication of C-EXC to support any action to improve the performance of the company, the ability to provide a high level of products and services and the satisfaction of the expectations of customers and parties involved.

The policies are made available to all internal and external stakeholders through the company own communication channels (website, intranet, e-mail, newsletter, company and work site bulletin boards).

The Policies are reviewed at least once a year during the Management Review, and they can be reconfirmed or revised, amended and updated.

The policies issued to date are:

- A-0000-RDE-CMS-ANN-02-01- Quality, Health, Safety and Environment
- A-0000-RDE-CMS-ANN-02-07- Alcohol and Drugs Policy

5.2.1. Policies accessibility

The Policies are made available to all internal and external stakeholders through the most important communication channels available to the company, in order to spread its vision to all the structures of the Organization:

- Company website: http://www.rizzanideeccher.com/qualita.asp;
- Company intranet portal, within the section relating to the Management System (http://www.rde.it/qualita.asp) (website, intranet, e-mail, newsletters and company bulletin boards).

- Project documentation.

5.3. Roles, responsibilities and authorities

(§ 5.3 14001 - § 5.3 45001 - § 5.3 9001)

The organizational structure of the Gruppo de Eccher, at a company, hierarchical, and branch level, is represented by means of organizational charts (Es. A-0000-RDE-CMS-ANN-02-03).

The following table highlights the main positions identified in the organization chart, which have the following overall responsibilities.

ROLE	OVERALL RESPONSABILITY
EXECUTIVE COMMITTEE (C-EXC)	Decides on the appointments and delegations of top-level executives. Determine the Group's annual business plan and address the areas of development. Review's the Management System.
DEVELOPMENT DIVISION (C-DEV-EXD)	Plans the Company's commercial and promotional strategies in Italy and abroad.
Development & Marketing (C-D&M)	Coordinates the Company's commercial and promotional strategies in Italy and abroad.
Technical Services (C-TES)	Coordinates the civil engineering project activities and the resources necessary for the technical activities at the construction sites. Supervises the study of technical-commercial offers. Oversees the logistical support of activities at the construction sites.
MANAGEMENT DIVISION (C-MGM-EXD)	Program and supervises the activities at the service of Administration, Finance, Legal, Human Resources, Organization, QHSE, Control, Procurement, and Information Technology of the Company.
Administration & Finance (C-A&F)	Oversees the administrative and fiscal management of the company. Supervises the activities of the Procurement Office and the Accounting Office.
Human Resources, Organization & QHSE (C-HRO)	Overlooks the activities, development and personnel recruitment at the Human Resources department. Supervises the activities of the Prevention and Protection Service as well as the Management System.
Legal (C-LEG)	Provides legal assistance to all company positions on issues concerning foreign and Italian legislations.
Control, Procurement & Plant, Information Technology (C-CPI)	Direct the activities of the technical services, the logistics, the management control reports, and information technology in order to provide adequate support to the construction sites.
OPERATIONS DIVISION (Division A/Division B) (C-OPE-EXD)	Oversees the company's production activities in Italy and abroad.
Area Operations (A-OPE-DIR)	Coordinates and directs the operational delegates and site managers of the projects to him or her assigned. Supervises the application of the Management System which he holds the role in communicating the necessary updates / implementations to the QSE office.
SUBSIDIARIES DIVISION (C-SUB-EXD)	Oversees the activities of the company in Italy and abroad.

To better identify the different managements profiles, Rizzani de Eccher has adopted the following classification system (Rif. A-0000-RDE-CMS-IST-01-01):

- Company level (C-)

The Group Organization Chart, defined by C-EXC, it is published on the Connect portal (*connect.deeccher.com*).

- Area level and subsidiary (A-)

In the event of a new Area organization, the A-OPE-DIR of the new Area / Subsidiary (A-OPE-DIR / A -___- DIR) issues a new specific organization chart. The new organization chart is made accessible to all interested parties.

- Project or office level (P-)

In the event of a new project organization, the P-OPE-MGR will issue a new specific organization chart. The new organization chart will be approved by A-OPE-DIR and made accessible to all interested parties.

C-HRO-MGR deals with the definitions of the individual Job Positions and Job Descriptions as required by procedure A-0000-RDE-CMS-PRO-05-01-Human Resource

On a monthly basis, each Production Unit and Geographical Area is monitored by the "Direction Central Operation" (DCO), made up of the Executive Management of the respective Division and Project Control. (Ref. "A-0000-RDE-CMS-IST-09-01-00 Order control management" §11)

5.4. Consultation and participation of workers

(§ 5.4 45001)

The Top Management considers of fundamental importance that all the staff is actively involved in running the QHSE Management System. For this purpose, in collaboration with C-QSE, it periodically organizes meetings, during which the problems inherent to the management system itself, the description of procedures to be carried over, and any suggestions that could improve the processes are discussed and analysed. These meetings are documented, and any communications relating to the management of the QHSE Management System are disclosed to the company's internal communications channels.
The Top Management of RdE guarantees that:

- the methods, time, training and the resources necessary for consultation and participation are provided;
- timely access is provided to clear, comprehensible and relevant information on the OH&S Management System;
- obstacles or barriers to participation are identified and eliminated and those that cannot be removed are minimized;
- consultation of workers without managerial functions is encouraged on the following aspects:
  - needs and expectations of parties involved;
  - OSH policy;
  - roles, responsibilities and authorities in the organization;
  - fulfilment of legal and other requirements;
  - OSH objectives and how to achieve them;
  - what needs to be monitored, measured and evaluated;
  - audit programs;
  - continual improvement;

- participation of workers without managerial functions with regards to the following aspects:
  - methods for their consultation and participation;
  - identification of dangers and assessment of risks and opportunities for the OSH;
  - competence requirements, training needs, training to be carried out and evaluating the training itself;
  - what needs to be communicated and how to do it;
  - control measures and their effective use and implementation;
  - investigating incidents and non-conformities and determining corrective actions.

In each Production Unit there will be a workers' representative, possibly elected through elections, for the purpose of consultation and participation of workers (Ref. A-0000-RDE-CMS-PRO-02-01- Leadership §10).

6. PLANNING

6.1. Address risks and opportunities

6.1.1. General

(§ 6.1.1 14001 - § 6.1.1 45001 - § 6.1.1 9001)

Given the territorial extent in which the RdE activities take place, the internal organization delegates to the peripherally appointed Employer, the identification of risks and the opportunities that needs to be addressed, as well as the planning of the related actions to undertake.

The QHSE Plan, highlight the needs and expectations of interested parties, of internal and external factors, of legal and other applicable requirements, and of the objectives. Ultimately, it plans the actions to deal with risks and opportunities (risk-based thinking).

The peripheral organization (local production units) evaluates its performance with the continual improvement approach: The Top Management, through the C-QSE, also carries out internal compliance audits.

The results contribute to the evaluation of the effectiveness of the actions taken by the peripheral Top Management; specific reporting and internal audits carried out by the independent C-QSE service report the system performance assessments to the Top Management or its Representative, and are subsequently discussed monthly and through annual review meetings, between the management and the same A -OPE-DIR.

Immediate actions can be taken if serious situations conflicting with the founding principles of the company policy are detected or reported.

6.1.2. Hazard identification and assessment of risks and opportunities

§ 6.1.1 9001 – § 6.1.1, 6.1.2 14001 – § 6.1.2.1, 6.1.2.2, 6.1.2.3 45001)

The assessment of risks / opportunities / environmental impacts assumes different levels of detail based on the application area to which it refers: to the company as a whole or referred to each specific project.

Level 1: analysis and management considerations applicable to all business activities and the company Headquarters.

Level 2: analysis and management considerations applicable to the different Operating Areas and Companies belonging to the group.

Level 3: Analysis and management considerations referred to a specific project, have a greater level of detail and analyse risks / opportunities, environmental impacts and related management measures, applicable to the operational activities of a specific site of the construction site.

The processes of identification and assessment of risks / opportunities / environmental impacts form the foundation of the entire Management System.

The evaluation of the processes is carried out for the first time in conjunction with the start of the integrated management system. On an annual basis, an assessment of consistency with company processes is carried out.

The following elements are considered in the analysis and an assessment of the environmental impact inside and outside the construction side.

COMMON ASPECTS TO QUALITY, ENVIRONMENT, HEALTH AND SAFETY

- Considerations on the external and internal context of the Organization and on the requirements of the relevant Interested Parties;
- Integrated Management System Policy;
- Non-compliance;
- Audit results on the Management System;
- Information from the consultation of workers on environmental health and safety issues, from review and improvement activities (both "reactive" and "proactive") and reports from other interested parties;
- Information on the best working procedures, on environmental aspects and typical OSH hazards associated with the Company, on environmental and health and safety accidents (with or without accidents) that occurred in similar companies;
- Information on the equipment, processes and activities of the Company;
- Process flow diagrams;
- Monitoring data on aspects of quality, environment, health and safety.

ENVIRONMENT

- Significant environmental aspects;
- Life-cycle of the work (or part of it), of materials and final disposal;
- Archival documents on environmental incidents;
- Compliance obligations;
- Environmental risks and opportunities;
- Inventory of environmentally hazardous materials (raw materials, chemicals, waste, products and by-products);
- Information on the work settings relevant to the environment (headquarters and construction sites), including interfering neighbouring activities.

HEALTH AND SAFETY

- Legal requirements on safety and other requirements;
- Archival documents of incidents with or without injury;
- Information coming from worker participation (both "reactive" and "proactive");
- Details on change control procedures.

- Floorplan of the production site;
- Identification of health and safety hazards;
- Inventory of hazardous materials to health and safety (raw materials, chemicals, waste, products and by-products);
- Information on the work environment relevant to the health and safety (headquarters and construction sites), including interfering neighbouring activities.

QUALITY

- Organizational structure, definition of tasks and availability of human resources;
- Communication processes and information relating to information management;
- Legal and other requirements applicable to the works carried out;
- Processes, products and services provided externally;
- Production and provision of services;
- Requirements and procedures for issuing products and services.

Examples of updates are:

- Changes involving direct or indirect obligations;
- Changes to regulations or voluntary agreements;
- Changes in activities, products or services;
- Installation of machineries or equipment's;
- Audit results.

P-OPE-MGR, in collaboration with C-QSE-MGR, analyses the organization and its context considering the internal and external factors relevant to its strategic directions and which influence its ability to obtain the results expected from its Management System.

P-OPE-MGR, in collaboration with C-QSE-MGR, analyses the organization and its context, by considering the relevant internal and external factors, capable of influencing the system's ability to achieve the expected objectives.

The impact assessment is obtained from the product of the Damage and Probability factors, in accordance with the procedure A-0000-RDE-CMS-PRO-04-01-Pianificazione.

6.1.3. Compliance obligations

(§ 6.1.3 14001 - § 6.1.3 45001)

The transfer of powers and responsibilities to the various managers of the company is conferred as defined in A-0000-RDE-CMS-PRO-02-01-00-Leadership.

By virtue of this act, the delegate in charge becomes the subject who assumes responsibility for the organization of the assigned Production Unit, including criminal responsibility, as he exercises decision-making and spending powers. With reference to the operating divisions, these delegations are generally granted to A-OPE-DIR or to P-OPE-MGR for the Production Units assigned to them. The delegate may, in turn, confer part of his obligations, functions and responsibilities to one or more subjects he trusts.

The responsibility for the activities relating to the determination, management, implementation and verification of the compliance obligations of RdE lies with the relative delegated subjects, supported by C-QSE-MGR.

The delegation of functions does not exclude the obligation of supervision with regard to the correct performance of the transferred functions by the delegate itself. Supervision is complied with through the adoption and effective implementation of the verification and control model; these include those certified in accordance with the International Organization for Standardization (ISO) 9001, 45001 and 14001.

The applicable national, regional and local regulations are provided through registration on specialized sites and subscriptions to specialized magazines. The C-QSE-MGR constantly analyses the information received (also with the newsletter subscription of specialized sites) and evaluates its applicability.

The main applicable common legislation is filed and updated by the C-QSE-MGR in the specific folder on the company server (§ 4.2). In order to inform the managers of the various functions about technical / legal aspects or related to quality, safety or the environment, communications or newsletter are issued by the responsible contact persons (summary of the contents of the regulations).

6.1.4. Planning action

(§ 6.1.2 9001 - § 6.1.4 14001 - § 6.1.4 45001)

The results of the assessment of risks / opportunities / environmental impacts may lead to the opening of non-conformities and be taken into consideration in the planning of actions for the management of risks / opportunities for the Environment, Quality, health and safety, found in the 'internal annex A-0000-RDE-CMS-ANN-02-02- Obbiettivi e programmi and in the subsequent Management Reviews.

For more details on the planning and monitoring of actions for the management of risks and opportunities, please refer to procedure A-0000-RDE-CMS-PRO-04-01-Planning.

6.2. Planning to achieve objectives

6.2.1. QHSE objectives

(§ 6.2.1 14001 - § 6.2.1 45001- § 6.2.1 9001)

C-EXC, A-OPE-DIR or P-OPE-MGR and C-QSE-MGR sets improvement objectives that are reassessed at least once a year.

In defining the objectives it is taken into account the following:

- the health and safety risks for workers;
- the results of the environmental audit;
- the results relating to customer satisfaction and the quality of the services offered;
- legislative requirements or other commitments signed by the organization;
- technological options and available budget;
- the views of the interested parties as a result of the communication and consultation activities.

6.2.2. Planning to achieve objectives

(§ 6.2.2 14001 - § 6.2.2 45001- § 6.2.2 9001)

In planning how to achieve its objectives, the Company determines:

- what will be done;
- what resources will be required;
- who will be responsible for achieving the objectives;
- implementation times;
- methods of evaluating the results, including any measurable indicators

The objectives and programs are formalized on Annex A-0000-RDE-CMS-ANN-02-02 in accordance with the procedure A-0000-RDE-CMS-PRO-02-01-00-Leadership

The Management Review (see procedure A-0000-RDE-CMS-PRO-10-01-QHSE Monitoring) represents the place where the progress of the objectives and programs are assessed, and where generally, the objectives for the following period are approved.

6.3. Planning of changes

(§ 6.3 9001)

During the review meeting, the input elements are analysed and assessed and, if deemed appropriate, changes to the system are planned; otherwise, they are considered adequate and compliant in order to best comply with the requirements set by management

Changes to the Management System can be managed by opening a program within A-0000-RDE-CMS-ANN-02-02- Objectives and Programs.

7. SUPPORT

7.1. Resources

7.1.1. General

(§ 7.1 14001 - § 7.1 45001- § 7.1.1 9001)

C-EXC has determined and provides the necessary resources for the establishment, implementation, maintenance and continual improvement of the Management System and its processes, both for the activities carried out at the Headquarters and those carried out at the construction sites. Responsibilities for the management and allocation of resources are entrusted through delegates in the manner identified within the procedure A-0000-RDE-CMS-PRO-02-01- Leadership.

7.1.2. People

(§ 7.1.2 9001)

RdE has established the methods for managing human resources and in particular by ensuring that the de Eccher Group personnel are included in the various functions with identified tasks and roles and with appropriate requirements of competence, experience and professional training. See procedure A-0000-RDE-CMS-PRO-05-01- Human Resources for the procedures of selection, hiring and managing personnel in the Company.

7.1.3. Infrastructure

(§ 7.1.3 9001)

The Top Management (C-EXC) of RdE has outlined and made available the tools necessary for the maintenance of the Management System and the effective implementation of the processes.

The Equipment and the capital goods are kept under control through two software's:

- D365: It allows the fiscal management of instrumental resources ensuring the traceability of the equipment through the association of physical identifiers and assets.
- BeanAsset: It allows the management of documented information relating to the identification, planning and recording of maintenance and control interventions. It allows for the monitoring of on-site equipment, both owned or with a rental agreement. It allows the filing of the technical documentation certifying the suitability of the equipment, including the use and maintenance manual.

The relevant machineries and equipment serving the Company Headquarters are summarized in a software for internal use which contains the schedule of the checks to be carried out.

For more details see procedure A-0000-RDE-CMS-PRO-06-01-Instrumental Resources.

7.1.4. Monitoring and measuring resources

(§ 7.1.2, 7.1.3, 7.1.4 9001)

RdE has identified the aspects of the work environment that are relevant to the operation of its processes and product compliance.

In order to guarantee a suitable work environment from a social and psychological point of view, RdE has adopted a Code of Ethics (http://www.rde.it/public/allegati/20-11-2015-16-3-5-12_398490.pdf) and carries out periodic work-related stress risk assessments considering both the context and content aspects of the work.

The aspects of the physical environment that may affect the quality of the works are identified in the various operating instructions in support of the A-RDE-CMS-PRO-09-01- Production procedure, to which reference should be made for more details.

7.1.5. Monitoring and measuring resources

(§ 7.1.5 9001)

The construction site activities involve the use of measuring instruments relevant to the quality of the product.

These instrumental goods are adequately kept under control, including through external calibration in order to guarantee the traceability of the measurements, as specified in the procedure A-0000-RDE-CMS-PRO-06-01-Instrumental Resources.

7.1.6. Organizational knowledge

(§ 7.1.6 9001)

The RdE Management System includes the procedures and operating instructions necessary to safeguard the organizational knowledge. The Management System allows the dissemination, control and update of these documents.

The reference standards, constituting a source of external organizational knowledge, are managed in a controlled manner.

Refer to procedure A-0000-RDE-CMS-PRO-01-01- Document management for a description of how to keep system documents under control.

7.2. Competence

(§ 7.2 14001 - § 7.2 45001- § 7.2 9001)

RdE has defined the skills necessary for the various functions, tasks and roles, which can influence the performance of the management system (A-0000-RDE-CMS-ANN-05-01-Job description).

The recruitment and selection of the de Eccher Group is based on identifying the best match between candidates and the needs of the project / office by evaluating the attitude, education, experience, skills, costs of people or any other relevant aspect, including budget evaluation and planning. The A-0000-RDE-CMS-PRO-05-01- Human Resources procedure provides the framework of the rules to be respected during the recruitment and selection processes.

RdE ensures that the personnel are subjected to adequate training and development opportunities that can allow the development of skills and enhance talents in order to satisfy the responsibilities and tasks required by their respective job positions, in line with the strategic objectives.

The procedures for planning, delivering training and training control, are described in procedure A-0000-RDE-CMS-PRO-05-01- Human Resources.

7.3. Awareness

(§ 7.3 14001 - § 7.3 45001- § 7.3 9001)

For RdE it is of fundamental importance that internal and external people who carry out work activities under its control are, aware of their contribution in order to achieve and continual improvement of the Management System.

For this purpose, C-QSE periodically organizes meetings, during which the problems arising in the management of the Management System itself, the adequacy of the Procedures that describe the processes, any suggestions for improvement, and the Quality Policy, are assessed, and the objectives defined. During the meetings, staff are made aware of the negative consequences of failing to apply the Management System's procedures.

The activity is also carried out at the project level by P-OPE-MGR.

Meetings are documented on appropriate forms.

7.4. Communication

(§ 7.4.1, 7.4.2, 7.4.3 14001 - § 7.4.1, 7.4.2, 7.4.3 45001- § 7.4 9001)

The communication relating to the aspects of the Management System is addressed to internal staff, customers and other parties involved.

As with regards to internal communication, RdE adopts different forms of communication such as:

- company bulletin boards;
- newsletters;
- meetings;
- internal training;
- information brochures;

- company intranet portal.

These activities are aimed at involving workers in the development and review of policies, procedures and instructions relating to the management of risks and opportunities.

The Organization promotes the involvement of workers by requesting their participation in business processes.

C-EXC guarantees that:

- the methods, time, training and resources necessary for consultation and participation are provided;
- timely access to clear, understandable and relevant information on the Management System is provided;
- obstacles or barriers to participation are identified and eliminated and those that cannot be removed are minimized;
- consultation and participation of workers without managerial functions is encouraged, also through their representatives.

With regard to external communication, RdE:

- makes the Company policies available, by publishing them on the connect.deeccher.com website;
- informs interested parties on the occasion of particular events by organizing meetings;
- publishes the certificates issued by the accreditation bodies on the connect.deeccher.com website.

Written communications to the administrative bodies relating to the regularization of bureaucratic and administrative procedures as well as communications from / to customers and suppliers, are the prerogative of C-HRQ-DIR and / or C-OPE-EXD. C-OPE-EXD moreover, is supported by the various business functions. Special distribution lists send copies of the various documents to the internal parties concerned.

Appropriate communication management in case of emergency are identified with the subcontractors, contractors and customers.

Please refer to procedure A-0000-RDE-CMS-PRO-02-01 Leadership for more details.

7.5. Documented information

7.5.1. General

(§ 7.5.1 14001 - § 7.5.1 45001 - § 7.5.1 9001)

The QHSE Management System document is developed following the below hierarchy:

- Policies;
- Manual;
- Procedures;
- Instructions;
- Forms;
- Attachments.

The QHSE Management System documents and other corporate documents represent the guidelines for implementation and compliance with corporate QHSE requirements and ISO requirements.

The RdE Management System includes all the documented information required by the reference standards, as summarized in the appropriate table within the procedure A-0000-RDE-CMS-PRO-01-01- Document Management.

7.5.2. Creating and updating

(§ 7.5.3 14001 - § 7.5.3 45001- § 7.5.3.1, 7.5.3.2 9001)

The methods identified for the creation and update of documented information are reported in the procedure A-0000-RDE-CMS-PRO-01-01- Document Management, to which reference is made.

7.5.3. Control of documented information

(§ 7.5.3 14001 - § 7.5.3 45001- § 7.5.3.1, 7.5.3.2 9001)

The methods of checking the documented information and the documentation that makes up the Management System are reported in the procedure A-0000-RDE-CMS-PRO-01-01- Gestione Documenti.

In order to standardize the classification of documents, the Operating Instruction A-0000-RDE-CMS-IST-01-02 has been set up in order to provide a description of the process of forming a code to formalize the naming / numbering convention for documents that belong to the management system adopted.

8. OPERATION

8.1. Operation planning and control

(§ 8.1 14001 - § 8.1.1 45001- § 8.1.1 9001)

In defining the planning and control measures, the guidelines indicated by the company policy, the objectives, the legal and other applicable requirements, the customer's needs and the related product and / or service to be provided, are all to be taken into account.

For this reason, procedures have been defined to determine and control the product and / or the service requirements, among these the main ones are mentioned: A-0000-RDE-CMS-PRO-04-01-00 - Pianificazione A-0000- RDE-CMS-PRO-09-01- Produzione, A-0000-RDE-CMS-PRO-10-01-00 Monitoraggio.

The procedures for controlling the qualitative aspects and the related risks and opportunities are periodically reviewed to ensure their adequacy and effectiveness and in order to assess any changes that may become necessary.

This control is carried out by the peripheral production organization (construction site), during the Top management Review, based on the data collected during the monitoring activities, including system audits.

8.1.2. Eliminating hazards and reducing risks

(§ 8.1.2 45001)

Within the procedure **A-0000-RDE-CMS-PRO-04-01- Pianificazione**, to which reference should be made for more details, RdE has identified the criteria for assigning the priorities for intervention in the elimination of hazards and in the reduction of risks. The actions to be taken are identified using a "hierachy of controls" logic with the implementation of measures as reported in the following scheme:

8.1.3. Management of change

(§ 8.1.3 45001)

The following can be sources of change relevant to the health and safety of workers:

- Insertion of new work activities, or modification of activities and processes, including location, working conditions, machineries and equipment, workforce and related characteristics;
- Changes in legal and other requirements;
- Changes in the knowledge and information of dangers and risks;
- Developments in the knowledge and technology;
- New practices adopted spontaneously by workers.

RdE has prepared adequate procedures for the control and monitoring of these changes in order to promptly identify both at a project level (see procedure **A-000-RDE-CMS-PRO-09-01-Produzione**), and at a general management level (see procedure **A-0000-RDE-CMS-PRO-10-01-Monitoraggio**).

The changes identified, by being a source of risk / opportunity, constitute an input to planning; therefore, at the project level they will be managed within the QSE Plan, while at the company level they can be the basis for the creation of a new objective / program (**in A-0000-RDE-CMS-ANN-02-02- Objectives and Programs)** during the Management Review.

8.1.4. Outsourcing

(§ 8.1.4 45001)

The Outsourcing management is a process applied to all sectors and production units of the organization.

The organization has equipped itself with qualification and monitoring tools in order to ensure compliance with the requirements of its system by economic operators, services, functions and external processes.

The procedures include the use of IT platforms capable of exchanging, interacting with each other, the information contained therein, at all levels of the organization (eg Matrix software, initial and final Supplier Qualification, Non-Conformity, etc.).

8.1.5. Review of requirements related to products and services

(§ 8.2.3 9001)

The responsibilities, the operating procedures followed, and the records produced for carrying out the analysis and the coordination of the related activities are shown in the previous flow chart (§ 8.2.1). Moreover, they are specified in the customer-related processes (PRO of 03 Commercial) to which we refer promptly.

8.2. Emergency preparedness and response

(§ 8.2 14001 - § 8.2 45001)

Rizzani de Eccher bases its emergency preparedness on the analysis of events recorded on its units and also by considering the context of its operations. Detailed contingency plans are developed at each operational site where any type of activity is carried out

Audits and inspections are carried out in order to verify the completeness of the planning phase as well as to complete the implementation of the emergency requirements. The most important inputs are the following:

- Evaluation of the QHSE system and Identified control measures;
- Availability of local services and any applicable agreements;
- Compliance obligations;
- Analysis of past events;
- Analysis of events occurred on similar companies (same sector);
- Review of reports and performance of simulated exercises;

The system documents that guide this process are listed below.

A-0000-RDE-CMS-ANN-04-30-Piano Gestione Emergenze.

8.2. Requirements for products and services

(§ 8.2 9001)

8.2.1. Communication with the customer

(§ 8.2.1 9001)

The customer-related processes (PRO of 03 Commercial) precede the planning and management activities of design and / or production. The clarity of the information produced for these processes is therefore essential for proper planning and management of the entire order.

Furthermore, the company, having to operate in a global market that is competitive and dynamic, consider it important to keep the effectiveness under control in completing the largest number of tenders and negotiations of corporate interest.

Therefore it is considered important to maintain control over some parameters to evaluate their effectiveness:

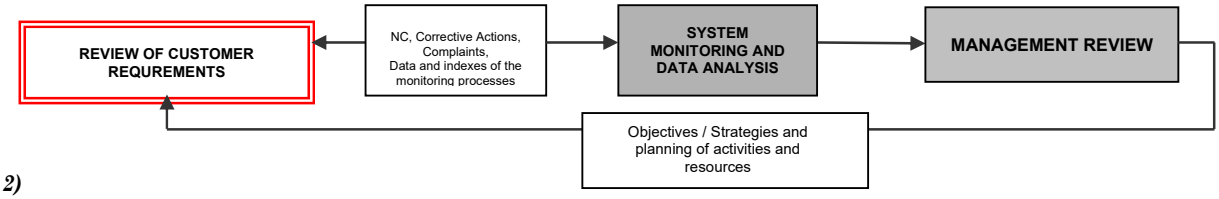
- completeness and timeliness of submission of tender documents;

- inconsistencies found during the contract review phase resulting from shortcomings in the analysis of the tender and definition of the offer;
- inconsistencies found in the planning phase of the order resulting from deficiencies in the analysis of the tender, definition of the offer and review of the contract.

The methodologies applied and the responsibilities invested for monitoring the effectiveness objectives referred to in the previous points are outlined in the management procedure A-0000-RDE-CMS-PRO-10-01-Monitoring.

The review of customer requirements, the interactions with other business processes and the input and output documents can be illustrated with the Flow Chart below.

1)



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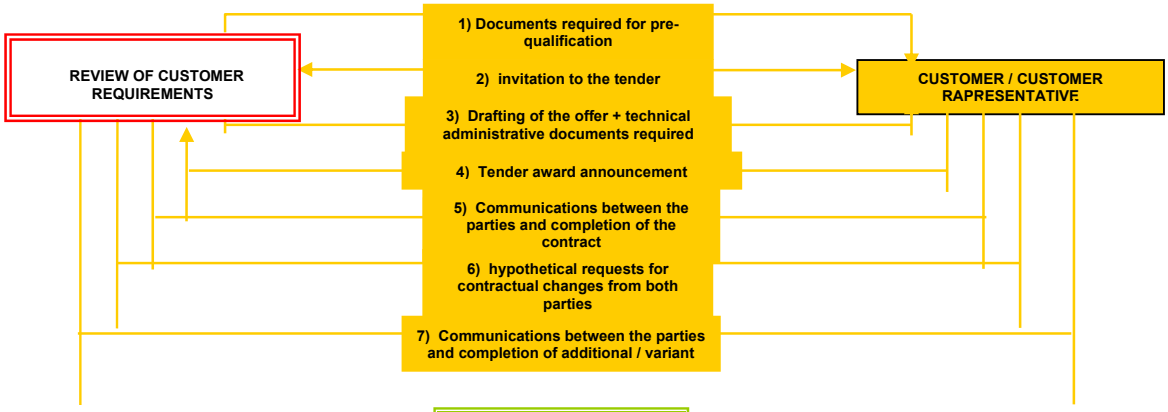

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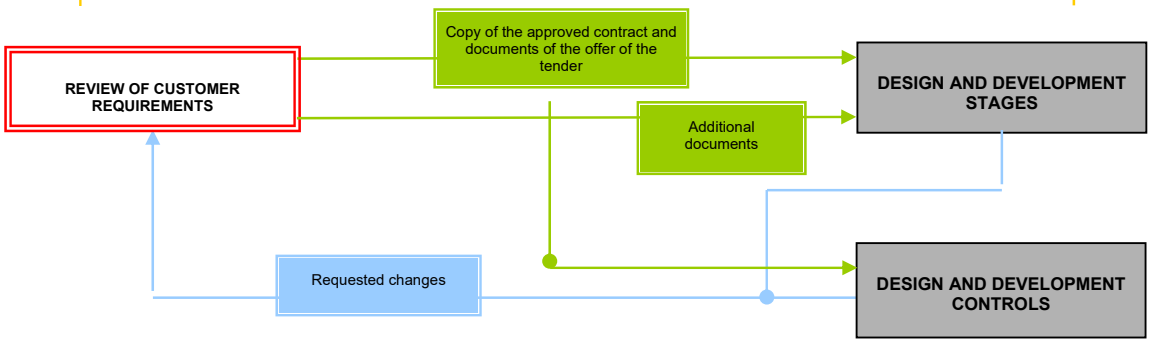


LEGEND:

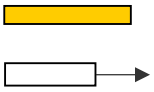
Examined process

Interacting processes

Communications and input support to the process

External bodies

Information from monitoring processes



Communications and support output from the process

Communications and interfaces with external parties

8.2.2. Determination of requirements for products and services

(§ 8.2.2 9001)

The activities to review the needs of the public or private customer are carried out in the following phases:

- Study of the tender and formulation of the offer.
- Examination of the contract.
- Examination of variants.

The review of the offer and the contract verifies that:

- all the technical, economic and qualitative requirements requested in the customer's documents are clearly defined and eventually resolved.
- all the legal and regulatory requirements applicable to the contract are clearly outlined and the technical-economic impacts on the contract are assessed.
- the unique requirements regarding materials, components and systems are identified.
- the production processes and their criticalities are identified.
- the needs for new alternative technologies and / or special equipment are assessed.
- the need for personnel with specific specializations and qualifications is identified.
- the possibilities and the ability to satisfy the explicit and implicit requirements of the customer are put in place.

Furthermore, in this phase, through communication and meetings with the customer, everything that could create ambiguity and non-satisfaction of the expectations of the customer, will be clarified.

8.2.3. Review of requirements related to products and services

(§ 8.2.3 9001)

The responsibilities, the operating procedures followed, and the records produced for carrying out the analysis and the coordination of the related activities are shown in the previous flow chart (§ 8.2.1) and are specified as well in the customer-related processes (PRO of 03 Commercial) to which we refer promptly.

8.2.4. Changes to requirements for products and services

(§ 8.2.4 9001)

When the requirements of products and services are modified, such as the variation of a product or article, the organization internally communicates the changes to the persons responsible for implementing the system in order for the requirements modifications to be acknowledged and monitored (e.g. to P-QSE or P-OPE-MGR for the supply of materials and / or services on site).

8.3. Design and development of products and services

(§ 8.3 9001)

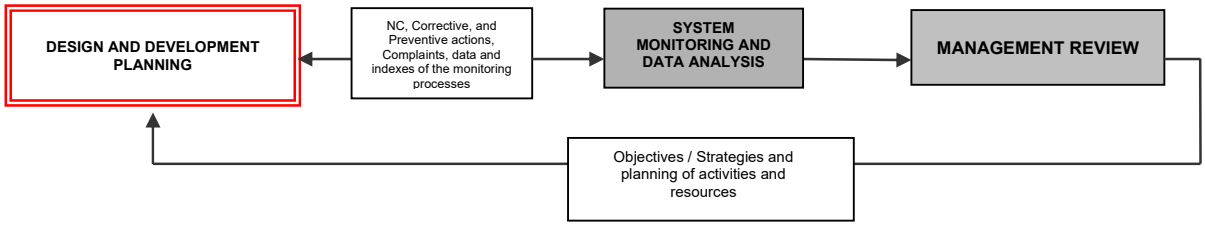
8.3.1. General

(§ 8.3.1 9001)

The design and development of products and services is regulated by the PRO-09 Design and Development.

The interaction with other business processes and input and output documents can be represented as follows:

1)



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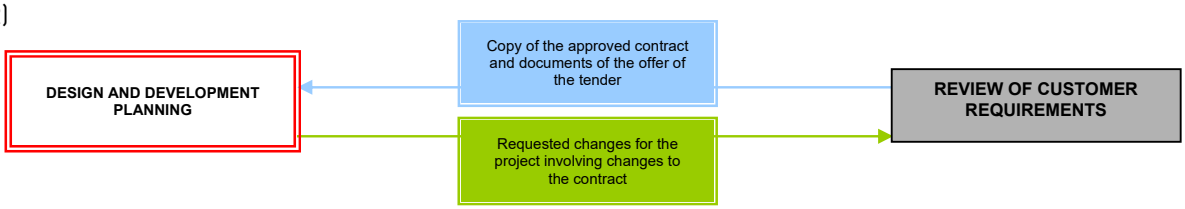

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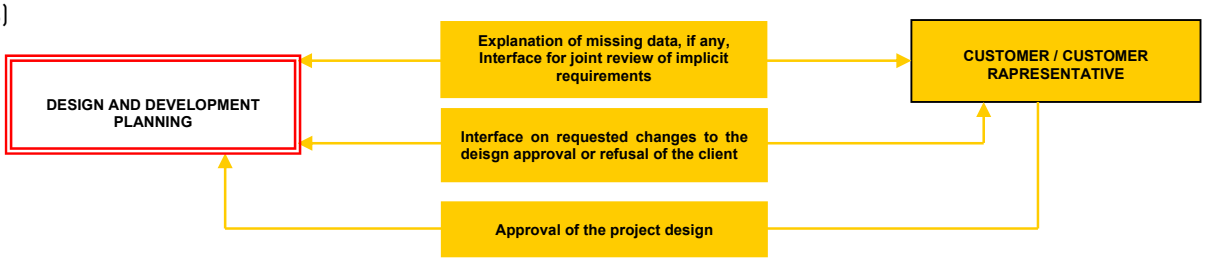

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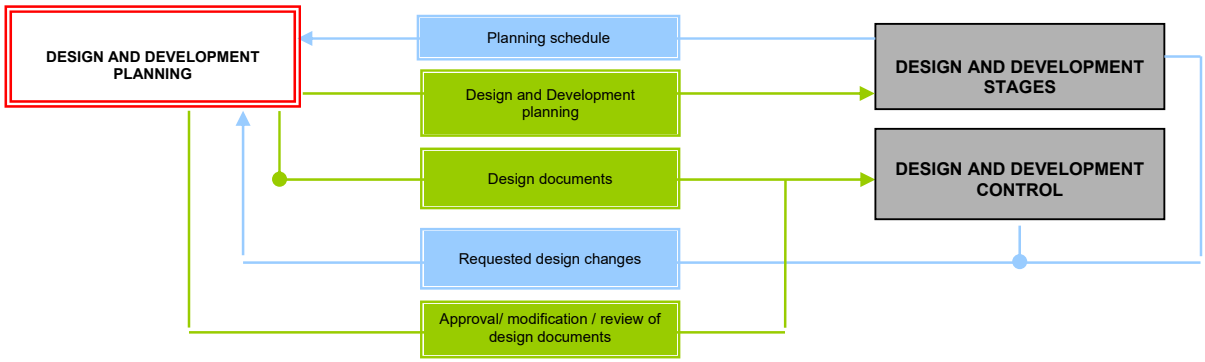


LEGEND:

Examined process

Interacting processes

External bodies

Information from monitoring processes

Communications and input support to the process

Communications and support output from the process

Communications and interfaces with external parties

8.3.2. Design control and development planning

(§ 8.3.2 9001)

The development activities of the design processes are based on the contractual documents that are outlined on the "Design Plan" (A-0000-RDE-CMS-FRM-07-01 Plan Design). During the activities, the document itself will be updated according to the progress made.

The "Design Plan" lists, in logical phases, the operational procedures for the development of the design; they are mainly:

- Definition of competences, responsibilities and communication between the internal and external figures involved in the design.
- Verification of data inputs.
- Planning of the activities to be carried out and the issue of the "Planning Documents".
- Design verification.
- Project review.
- Project approval.

The degree of detail of the planning will be adequate in order to allow a correct development of the design and the execution of checks and reviews.

The design and verification activities are assigned to highly qualified personnel who must be supported with the tools and equipment in order to face any challenge. When the project activities are outsourced, the professional offices that are used are evaluated in advance.

The changes made to the "Design Documents" are identified, documented, examined and approved by authorized personnel (or by the client, when contractually required), before their implementation.

The management of changes is entrusted to personnel who followed the original design or who can access the necessary information and basic data.

The responsibilities and operating procedures followed for carrying out the analysis and coordinating the related activities are specified in procedure **A-0000-RDE-CMS-PRO-07-01-Design,** to which we refer promptly.

The planning and control process of the activities must take place not only in compliance with the contractual, regulatory and legislative requirements in force but also in compliance with the objectives of effectiveness outlined by the management.

Therefore the following parameters are kept under control:

- compliance with the time limits for each project activity with respect to the "planning schedule;
- reduction of the rework of documents that are not accepted by the external designer as they are incomplete or incorrect;
- reduction of the rework of documents not accepted by the client as incomplete or incorrect;
- detailed definition of the "construction project" / reduction of problems in the construction phase,

The project planning has the following purposes:

- the definition of the objectives that the project planning will have to achieve;
- drafting of the "Design Plan" document.

The planning identifies:

- operational subdivision of the overall design into various phases and, for more complex designs, a subdivision of each phase into different design activities;
- input documents (data and basic requirements formalized in technical specifications, technical reports as well as lists of regulations and mandatory laws relating to the project activity);
- output documents (type and quantity foreseen in relation to the design and technical documents);
- explanation of the functional relationships / constraints and interferences between the phases / project activities
- forecast of the various planning activities (deadlines) in consideration of the general time constraints imposed by contract;
- identification of the phases / activities entrusted to external collaborators;
- timing of all activities, including verifications, reviews, validations, and priorities (also by means of a graphic elaboration developed with excel or similar to be attached);

- need for checks at third parties (Fire Brigade, superintendency, ASL, etc); need for checks at third parties (Fire Brigade, Superintendency, ASL, etc);
- functional and nominative definition of the positions involved in the design process.

The documentation produced during the Planning phase of the project activities will become an integral part of the Design Plan and will form the basis for the formulation of the tasks relating to the project phases entrusted to external organizations.

In the event that the outsourced service is entrusted (§ 8.4), this will be examined for its reliability characteristics (knowledge from previous works, client presentation, knowledge of the site, etc.). On the basis of the agreement and the tender procedures (requirements, timing, etc.), a specific credit agreement will be drawn up.

8.3.3. Design and development inputs

(§ 8.3.3 9001)

The input elements that define the requirements for the realization of the product (design + construction) are essentially the following:

- the functional and performance requirements requested by the customer or by the industry-specific requirements;
- the applicable mandatory requirements relating to the project;
- the experience gained in other similar projects;
- further other requirements requested by external bodies other than the customer (Superintendency, Fire Brigade, etc).

All documents relating to the input elements will become an integral part of the Design Plan (A-0000-RDE-CMS-FRM-07-01 Plan Design).

8.3.4. Design and development controls

(§ 8.3.4 9001)

. At the end of the completion of each design phase, DSG-CDR carries out the analysis and formal control of the results of the individual design activities, through a Design Review. An important step during this phase is to check that customer, regulatory and company specifications are respected. If so, DSG-CDR proceeds with the activities of any subsequent phases.

Furthermore, for complex design activities within the deadlines established in the Design Plan and in any case at the end of each macro phase, DSG-CDR convenes a review meeting with the participation of OPE-MGR, external designers (if appointed) and with the possible participation of the client or its representation.

During this meeting, a review of the design phases carried out with respect to the entire project is carried out, verifying the consistency with the other design phases, and the compliance with the plan

For more details, see procedure A-0000-RDE-CMS-PRO-07-01-Design.

8.3.5. Design and development outputs

(§8.3.5,9001)

The output elements of the design - graphic drawings - must be as similar as possible to the input elements in order to facilitate the reading and the comparison.

The documents issued by the Designer must uniquely specify the characteristics of the products to be used in the construction process, also by using the reference codes of the price list.

8.3.6. Design and development changes

(§ 8.3.6 9001)

They can be summarized in the following cases

- changes during the design process (due to negative results of verifications, reviews or validations by the client);
- changes requested by the customer during the design or during the ongoing works or due to changes in legislation;
- Modifications of the ongoing works (due to unforeseen executive problems).

Depending on the importance, these changes can be performed directly under the control of P-OPE-MGR or verified and approved by DSG-CDR, updating the graphic tables.

Depending on the state of the works, DSG-CDR can verify the feasibility of the requests from subcontractors. If the changes made involve parts of the ongoing works of third parties (prefabricators subcontractors, etc.), P-OPE-MGR will promptly inform and send a copy of the updated documents to them and inform the Procurement office.

8.4. Control of externally provided products and services

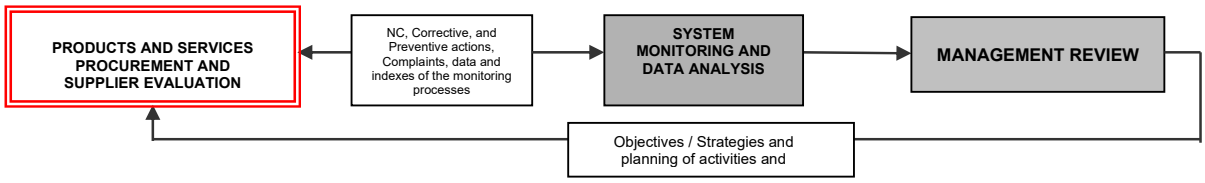
8.4.1. General

(§ 8.4.1 9001)

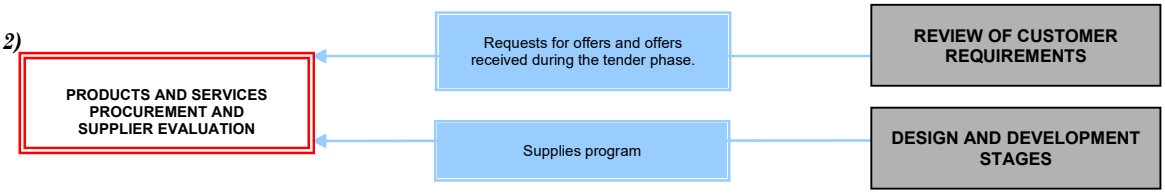
The design and development of products and services provided externally are regulated by the 09 Supplying procedures.

The interaction with other business processes and input and output documents can be represented as follows:

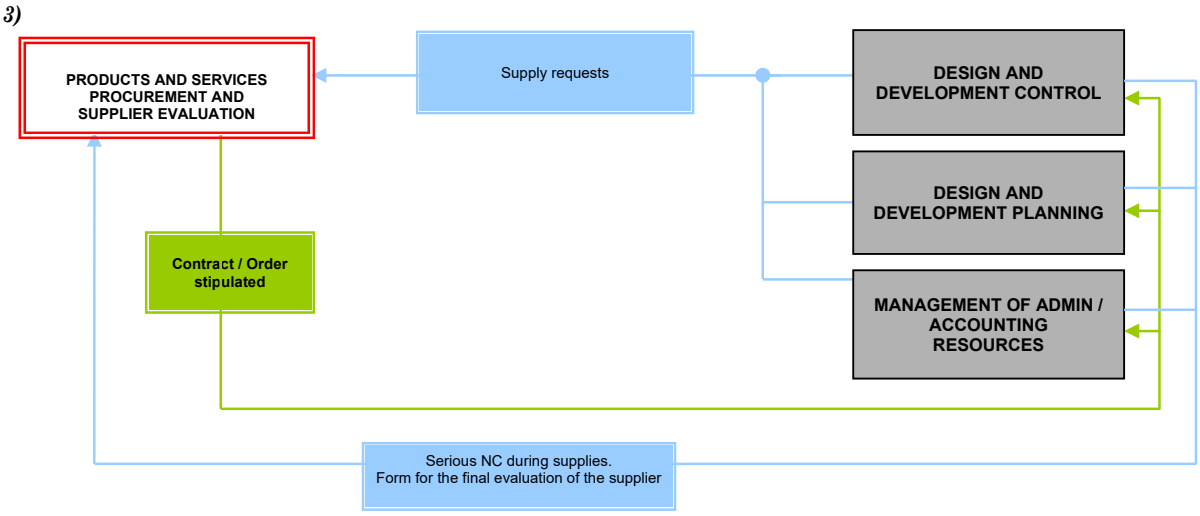
1)


PRODUCTS AND SERVICES PROCUREMENT AND SUPPLIER EVALUATION
NC, Corrective, and Preventive actions, Complaints, data and indexes of the monitoring processes
SYSTEM MONITORING AND DATA ANALYSIS
MANAGEMENT REVIEW
Objectives / Strategies and planning of activities and

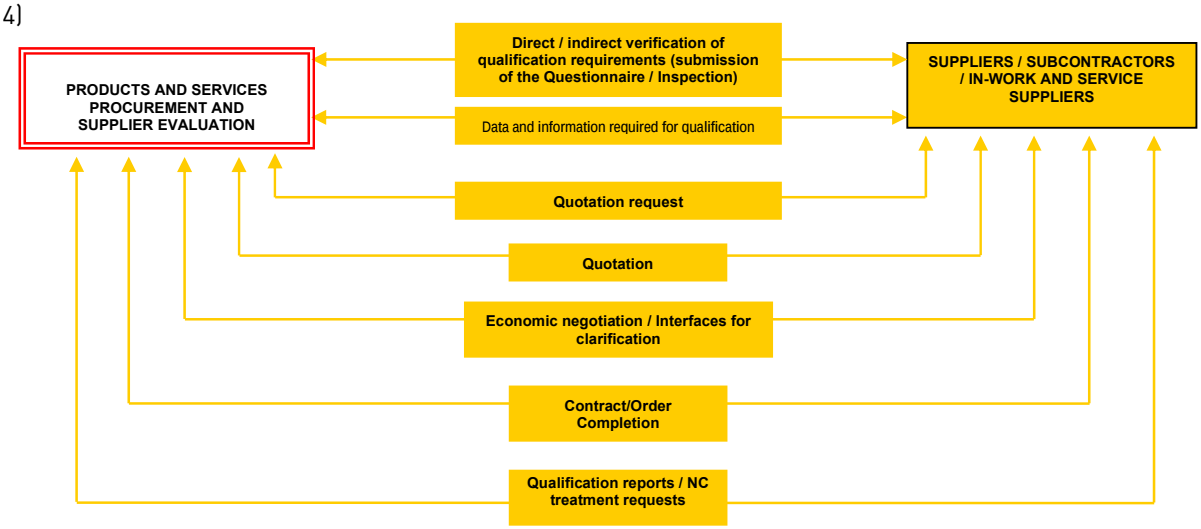
2)


PRODUCTS AND SERVICES PROCUREMENT AND SUPPLIER EVALUATION
Requests for offers and offers received during the tender phase.
Supplies program
REVIEW OF CUSTOMER REQUIREMENTS
DESIGN AND DEVELOPMENT STAGES

3)


PRODUCTS AND SERVICES PROCUREMENT AND SUPPLIER EVALUATION
Supply requests
DESIGN AND DEVELOPMENT CONTROL
DESIGN AND DEVELOPMENT PLANNING
MANAGEMENT OF ADMIN / ACCOUNTING RESOURCES
Contract / Order stipulated
Serious NC during supplies.
Form for the final evaluation of the supplier

4)


PRODUCTS AND SERVICES PROCUREMENT AND SUPPLIER EVALUATION
Direct / indirect verification of qualification requirements (submission of the Questionnaire / Inspection)
Data and information required for qualification
SUPPLIERS / SUBCONTRACTORS / IN-WORK AND SERVICE SUPPLIERS
Quotation request
Quotation
Economic negotiation / Interfaces for clarification
Contract/Order Completion
Qualification reports / NC treatment requests

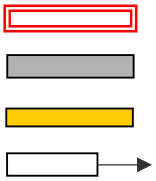
LEGEND:

Examined process

Interacting processes

External bodies

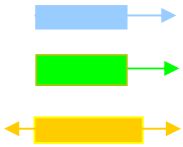
Information from monitoring processes



Communications and input support to the process

Communications and support output from the process

Communications and interfaces with external parties



8.4.2. Type and extent of control

(§ 8.4.2 9001)

The processes, products and services provided externally remain under the control of the RIZZANI integrated system.

Tests, checks and inspections on the products and services supplied are carried out according to the procedures outlined in the management procedure "A-0000-RDE-CMS-PRO-09-01-Produzione" and in accordance with "A-0000-RDE -CMS-FRM-09-06 – Piano Controllo Qualità" issued during the planning phase of the order and in the contractual documents.

The "A-0000-RDE-CMS-PRO-08-02-Suppliers evaluation" process defines the criteria, extent and depth of the supplier's evaluation in order to ensure their ability to meet the requirements for what concerns products, materials and services.

The assessments and qualifications of the sub-contractor are differentiated according to the type of product / service and its final influence .

Only positively qualified suppliers are used for the procurement of supplies.

Suppliers are monitored based on their performance.

The list of suppliers and the effectiveness of the qualification system are evaluated progressively and at the end of their performance.

8.4.3. Information for external providers

(§ 8.4.3 9001)

Basing on the Price List and of the Work Schedule prepared during the Order Planning phase, the P-OPE-MGR issues the Procurement Requests (Richiesta di approvigionamento RdA). The Offer Requests (Richiesta di offerta RDA) are related to materials, services and subcontracts, and are sent by the Procurement Office to qualified or potentially qualified subcontractors. In any case, before the order is placed, the subcontractor must be positively evaluated.

The Purchase documents must clearly define the requirements for the supplies in order to be easy to comprehend. To this end, prior meetings with the subcontractor may be necessary before the order is placed.

The order form are prepared and issued by the procurement office and are set up according to the needs of other internal offices (eg. QSE, Legal, administrative, financial, etc.).

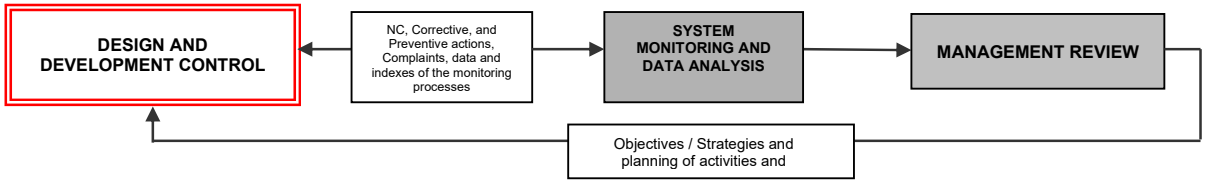
8.5. Production and service delivery

(§ 8.5.1 9001)

The design and development of products and services is regulated by the PRO-11 Production.

The interaction with other business processes and input and output documents can be represented as follows:

1)



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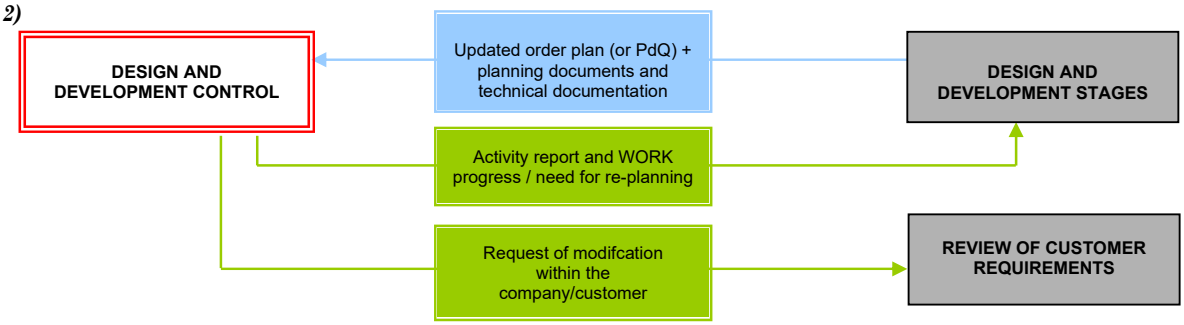

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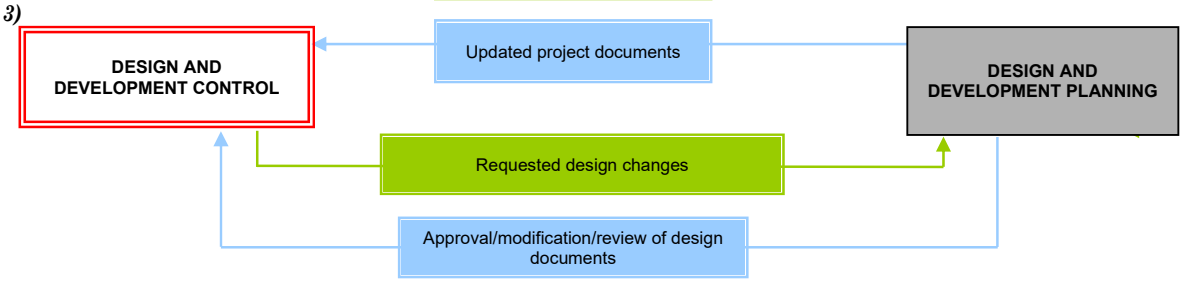

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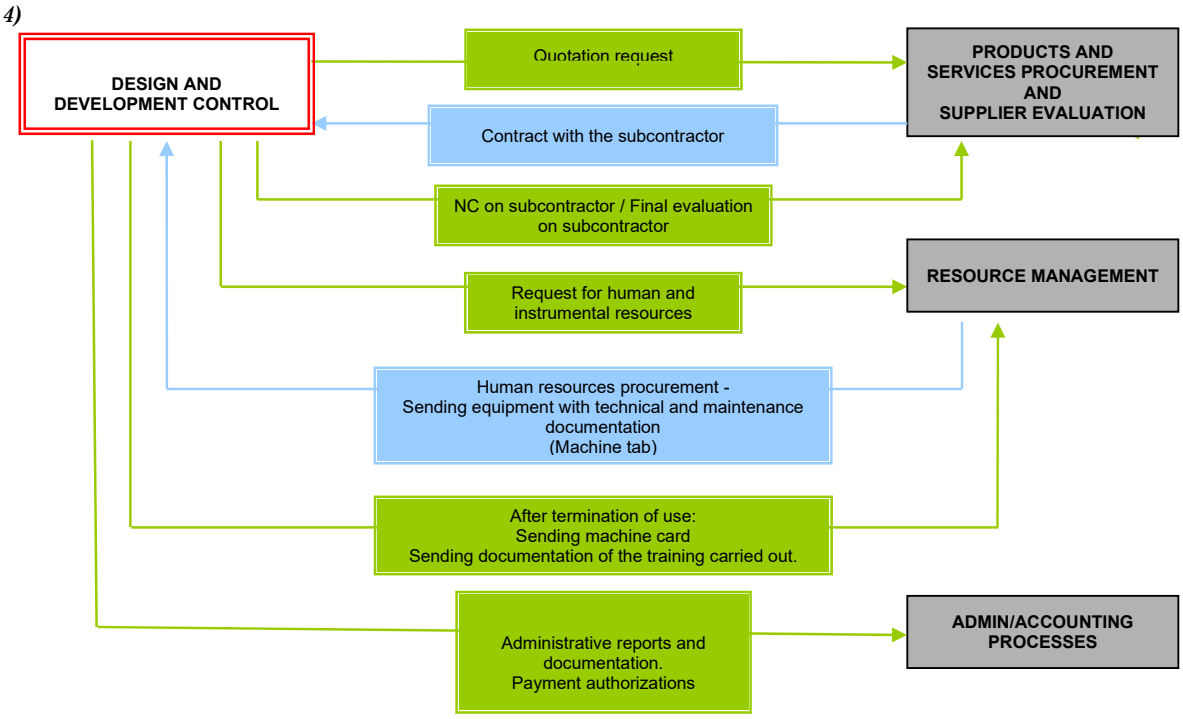

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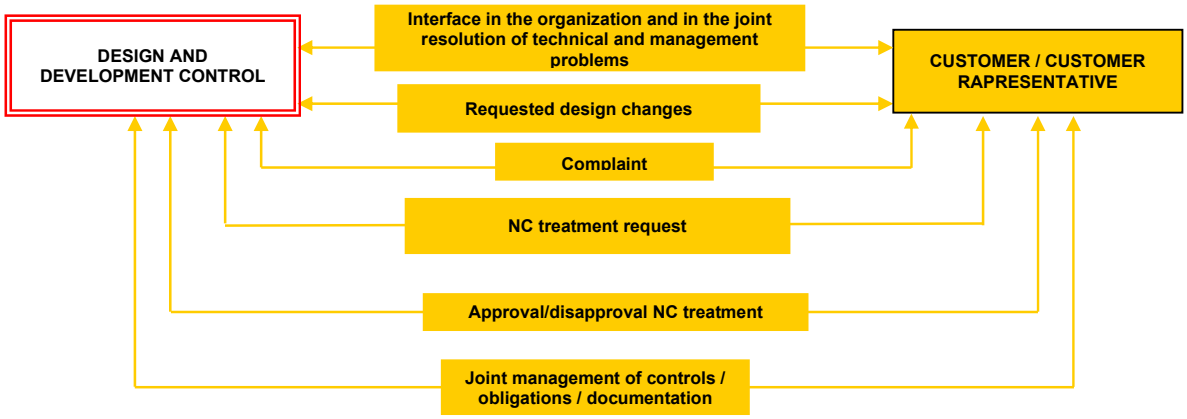

LEGEND:

Examined process

Interacting processes

External bodies

Information from monitoring processes

Communications and input support to the process

Communications and support output from the process

Communications and interfaces with external parties

8.5.1. Control of production and service delivery

(§ 8.5.1 9001)

The "A-0000-RDE-CMS-FRM-04-10 - Quality Management Plan" is the main tool for managing the project and is made up of planning documents of the activities and controls to which all the company functions involved must follow in order to ensure its correct execution.

The design and development planning documents are mainly intended for the execution and control process, whose operational management is delegated to the P-OPE-MGR.

The construction site set-up stage starts after having completed all the necessary formalities to obtain the opening of the site and the start of the work authorizations.

At the same time, the activities for the installation of the construction site and operational planning for the start of the works are prepared.

During the executive phase of the construction site, P-OPE-MGR coordinates the execution of the activities of the construction site personnel, and of the subcontractors, and also interfacing with the other parties involved (Client, designers, authorities, local authorities, etc.).

P-OPE-MGR, has the task of preparing and organizing the resources planned in the "A-0000-RDE-CMS-FRM-04-10 - Quality Management Plan" for the performance of production and control.

For this purpose P-OPE-MGR:

- Initiates the procurement process for the goods and services necessary for the construction of the work;
- initiates the procurement process of equipment and instrumentation for testing and control purposes, which are necessary for the performance of production activities and

for the performance of the required controls (A-0000-RDE-CMS-FRM-09-06- Piano Controllo Qualità).

- guarantees, through the delegated staff, the correct use and maintenance of the equipment according to the operational procedures outlined in the procedure "A-0000-RDE-CMS-PRO-06-01-Instrumental Resources";
- guarantees, during the construction activities and when the work is finished, the correct execution of the testing, control and inspection activities according to what is planned in documents A-0000-RDE-CMS-FRM-09-06-Piano Controllo Qualità;
- guarantees the initiation of the management of non-conformities found during the testing and control activities, or for non- conformities related to complaints by the customer, making sure that these are identified, recorded, resolved, verified and closed;
- ensures the preparation of the records of the activities and of the checks carried out, archiving the records produced / received and ensuring easy traceability;
- reports to the P-OPE-DIR the technical, operational and economic performance of the work, based on the deadlines planned on "A-0000-RDE-CMS-FRM-04-10-Quality Management Plan" and, if necessary, promptly communicates the feedback of any discrepancies in the performance of production activities with respect to the program;
- prepares the bookkeeping of the construction site activities by interfacing with the head office for the completion of administrative-accounting procedures and for the eventual issuance of technical-accounting documents;
- activates the management of changes of the work in progress through the preparation of technical-economic variants and the requests for changes to the design;
- guarantees the qualification of processes and personnel;
- guarantees the correct identification of the materials and works as reported in the next § 8.5.2;
- guarantees the correct conservation and protection of the customer's or external suppliers' properties as indicated in the next § 8.5.3;
- guarantees the correct conservation and delivery of the products and works as reported in the next § 8.5.4 even during the suspension of the works;
- guarantees the correct use and control of the instruments for testing and control as indicated in the next § 8.5.6.

The responsibilities and operating methods followed for carrying out and coordinating the above activities are described in "A-0000-RDE-CMS-PRO-09-01-Produzione" to which reference is made promptly.

This process must take place not only in compliance with the contractual, regulatory and legislative requirements in force, but also in compliance with the company objectives (technical and economic). The requirements and objectives of the work are found in the "A-0000-RDE-CMS-FRM-04-10-Quality Management Plan" and in the documents referred to therein.

The following parameters are held under control for the purpose of the quality objectives:

- compliance with processing times;
- correct implementation of the planned production methods;
- compliance with the planned control activities;
- compliance with economic-financial budgets;
- correct recording of activities and controls.

8.5.2. Identification and traceability

(§ 8.5.2 9001)

8.5.2.1. Identification

The works and projects are identified by an internal code, which is reported on all related documents and the management database.

The construction sites are identified by displaying signs that comply with the existing laws or with the contractual requirements.

Products and materials for the batches, must maintain their identification from their arrival at the construction site until their use or in any case the must follow the procedure contained in the contract or law for its maintenance.

QSE verifies the requirements according to the established schedule.

QSE, or its representative, must check the material entering the site; what follows is an acceptance or rejection of the material itself. In such case, a Non-Conformity according to "A-0000-RDE-CMS-PRO-11-01-Nonconformity" must be opened.

QSE, or its delegate, will identify works, or materials which are non-compliant by marking the material with a coloured strip in order to avoid the involuntary continuation of construction activities before the resolution of the Non-Conformity itself; if physical identification is not possible, the Non-Conformity will be documented through an appropriate red signal on a copy of the drawings or project documents to which the NC is attributed.

8.5.2.2. Traceability

The traceability of the documents relating to the construction site guaranteed through the affixing of the construction site code to the documents relating to it, and by a correct filing managed by the site personnel according to the procedures provided for in "A-0000-RDE-CMS-PRO-09- 01 - Produzione ".

P-OPE-MGR, in agreement with QSE, issue, when contractually required or deemed necessary, documented information capable of certifying the traceability of products and materials.

Traceability is however guaranteed for the following:

- Of materials, components and work parts, with the quality registration documents required by the current legislation;
- Of the calibration of test equipment, and the measurement and testing of the equipment with reference standards;
- non-compliant materials, components and work parts.

When traceability is a contractual requirement, failure to comply will result in a Non-Conformity according to "A-0000-RDE-CMS-PRO-11-01-Nonconformity",

The operating procedures followed to ensure the identification and traceability of materials and works during the operating cycle are further specified in "A-0000-RDE-CMS-PRO-09-01-Produzione".

8.5.3. Property belonging to customers or external providers

(§ 8.5.3 9001)

The organization checks, identifies, verifies and protects what is supplied and what will then be transferred to the final customer (site, systems, furnishings, etc ...).

In general, apart from cases in which special arrangements are established with the customer for the treatment and use of the products supplied by him, each product is checked, stored and maintained as products owned by the Company. Products supplied by the customer that are lost, damaged or otherwise unsuitable for use are registered and notified to the customer. The Functions involved in the activities of the products supplied by the customer, unless otherwise specified in the "A-0000-RDE-CMS-FRM-04-10-Quality Management Plan", are the same as those involved in the Company's materials. The verifications by the Company on the products supplied by the customer do not relieve the same from having to supply acceptable products.

8.5.4. Preservation

(§ 8.5.4 9001)

In order to ensure the maintenance of the initial characteristics and the identification of materials, components and parts, it is envisaged that:

- suitable methods are adopted for the handling of materials, components and assembled parts through the preparation of:
  - internal instructions or suppliers instructions;
  - personnel adequately informed and trained in the use of every precaution necessary to avoid damage to people and things;
  - suitable vehicles that are checked and maintained.
- suitable procedures are adopted for the storage and conservation of materials, components and parts assembled through the provision of:
  - suitable premises in accordance with the applicable laws and regulations, and specific areas that allow for the materials, components and parts to be arranged in accordance with the instructions provided;
  - periodic checks aimed at ascertaining the suitability of the warehouses, the environmental conditions, and the conditions and maintenance of the materials, components, and parts;
  - warehouse areas reserved for the storage of non-compliant materials, parts and components.
- suitable procedures are adopted for the packaging and storage of materials on site, providing that:
  - as applicable, the materials and components are purchased with suitable packaging to protect them from the environment and external stresses;
  - the packaging shows the identification of the material and, if necessary, the information relating to safety required by law for the correct storage and handling;
  - materials, components and parts that have been temporarily removed from their original packaging are repackaged if they are to be reused at a later stage.

During the planning phase of the construction site "A-0000-RDE-CMS-FRM-04-10-Quality

Management Plan", particular needs for the conservation of materials, components and parts of the work are highlighted, and any specific measures to be adopted is outlined through the issuing specific operating instructions.

8.5.5. Post-delivery activities

(§ 8.5.5 9001)

If requested by the customer the company will commit to meet the requirements relating to post-delivery activities associated with the products and / or services provided, including interventions under warranty or contractual obligations (eg. Maintenance).

8.5.6. Control of changes

(§ 8.5.6 9001)

Changes to the production or provision of services are managed by the organization through targeted checks and reviews. Specific documented information (§ 7.5) will report the results of the reviews, and the actions to be taken.

8.6. Release of products and services

(§ 8.6 9001)

P-OPE-MGR, in agreement with QSE, has the task of preparing the most suitable methods in order to guarantee the correct conservation of the works even during the suspension of the works (guardian of the work or of the construction site, barriers, fences, closure of entrances and openings in the works). P-OPE-MGR has also the task of preventing access to outsiders who may misuse the work (damage due to negligence) or cause negative environmental impacts on the work itself (damage due to vandalism) or damage to third parties or to themselves.

At the end of the execution of the activities, and of the tests, and final checks of the works, P-OPE-MGR or QSE, integrates the final documentation, articulated according to the contents and methods provided in the contract, with any technical-administrative authorization issued by public bodies certifying the viability and suitability for use of the work. P-OPE-DIR will then arrange a visit to the construction site with the customer in order to verify the completion of the works; this is recorded on a document in the manner provided by the contractual requests and by the existing laws.

In the time between the completion of the works and their delivery, P-OPE-MGR has the site completely cleared of materials, equipment and machineries. At the same time, it defines and implements all the protective arrangements necessary to maintain the quality achieved during construction and to prevent theft, vandalism, or fire.

If necessary, or requested in the contractual documents, P-OPE-MGR implements the arrangements for the ordinary maintenance of the works. During this time the P-OPE-MGR arranges controls to verify the maintenance of the aforementioned protections; the controls are documented and sent to the customer.

8.7. Control of nonconforming outputs

(§ 8.7 9001)

With the term "Non-Conformity" it is meant "Non-fulfilment of the specified requirements" and particularly, "deviation or absence of one or more quality characteristics or of some elements of the Quality System".

The company takes into account non-conformities relating to:

Material / components: These NCs are related to materials and components that have relevance for the quality of the finished products. Differences with respect to what is prescribed in the reference standards, in the instructions/manuals, in the technical specifications and in the company safety regulations, are also taken into consideration.

Product / service: These NCs are related to the the management and technical aspects and are detected during the checks and / or tests carried out by the company during the management process of the work, and they also include the failure to comply with the work requirements: These are related to the discrepancy of the methods adopted in the operational / management process with respect to the applicable documents.

Customer complaints: These are those that come from customers as a result of possible non-compliance with contractual requirements. They are treated, after having ascertained their validity, as Non-Conformity and managed according to the procedure A-0000-RDE-CMS-PRO-11-01-00-Nonconformity.

Quality System: NCs are always considered important. They are detected above all on the occasion of internal inspections, in this case they follow the management methods provided in the section 9.2 Internal Audits of this manual.

The Non-Conformity can be identified, following checks and verifications, at different moments in the process and is consequently classified as follows:

- upon receipt of the material.
- during the implementation process.
- during process checks and final testing.
- in the event of a customer complaint.

Anyone who identifies a Non-Conformity indicates it to the P-OPE-MGR and QSE, which will identify works, parts of them or materials which are non-compliant through coloured markings or coloured strips to avoid the involuntary continuation of construction activities before the resolution of the Non-Conformity itself; if physical identification is not possible, the Non-Conformity will be documented through an appropriate red signal on a copy of the drawings or project documents to which the Non-Conformity is attributed according to A-0000-RDE-CMS-PRO-11-01.

The non-conformities issued for the contract are summarized in the relative register for the purpose of a periodic assessment of the state and causes.

In this context, situations of organizational or training deficiencies may be detected; such situations require corrective action or risk review in order to eliminate future repetition of the problem.

The Non-Conformity Registers of all orders are sent periodically to the RGQ, which reviews and organizes them for an in-depth analysis that may lead to highlighting corrective and / or improvement actions during the "Management Review".

9. PERFORMANCE EVALUATION

9.1. Monitoring, measurement, analysis and evaluation

9.1.1. General

(§ 9.1.1. 14001 - § 9.1.1 45001 - § 9.1.1 9001)

The QSE constantly monitor the performance of the Company's Management System, also by carrying out the analysis of the return data from these activities (e.g. registrations, communications, complaints, non-conformities, audits, etc.).

The monitoring data are evaluated and compared with previous experiences (eg injury rates or environmental accidents), with the assessment of risks and opportunities, and with the previously set objectives.

The QSE annually measure quantities relating to management and operational aspects relating to the environment and safety, such as:

- the number of training hours;
- the number of non-conformities;
- the number of complaints;
- data relating to inspections and controls.

Furthermore, monitoring includes verifying the degree of achievement of the objectives (generally on an annual basis).

The monitoring of legislative conformities is carried out on several levels within the Management System:

- on a continuous monitoring activity described in the previous points.
- on the basis of the same workplace inspections, they can identify situations of non-conformity with the legal requirements;
- as part of the management of the updates of the legislation (Ref. A-0000-RDE-CMS-PRO-04-01-Pianificazione);
- as part of the audit activity (Ref. A-0000-RDE-CMS-PRO-10-01-Monitoraggio).

The monitoring activities and their evaluation are input elements to the Management Review.

The results of these checks may lead to:

- the enactment of corrective actions;
- a risk assessment review;
- non-conformity.

If the monitoring activity detects a disalignment from the limits imposed by the current legislation or from internal regulations, the company function that detects the disalignment will open a Non-Conformity procedure (Ref. A-0000-RDE-CMS-PRO-11-01-Nonconformity).

On the event that the analysis reveals potential emerging criticalities, the evaluation of risks and opportunities must be re-evaluated (§ 6).

9.1.2. Customer satisfaction

((§ 9.1.2 9001 - § 9.1.2. 14001 - § 9.1.2 45001)

QSE constantly updates the "Register of corporate legislative obligations" and the "Applicable requirements". Moreover it verifies the compliance through

- the adoption of the register of legal requirements and related schedule;
- the realization of internal audits;
- the collection and evaluation of the results of third party verifications.

Annually, during the Management Review, QSE presents a summary report on the results of the management / control of the state of legislative / regulatory compliance.

QSE evaluates the results, any problems that have emerged, non-conformities issued, and complaints or customer satisfaction. These can generate corrective actions and / or changes to the system for the purpose of continual improvement of the system itself.

The organization has for some time been equipped with special software that manages the relevant documented information so that there is confidence that the processes have been conducted as planned.

With regard to customer satisfaction, this is certified by means of test records (conformity of products and services), publications or awards, otherwise through complaints, disputes, etc.

The verification of substantial compliance is the prerequisite for guaranteeing compliance with the measures to contain impacts and reduce risks. It consists in verifying the compliance of what is being assessed (work equipment, workplaces, materials, etc.) with the provisions of the mandatory regulations.

QSE periodically, and in any case when reviewing the system, carries out an assessment to update the applicable legal requirements. The assessment of compliance with the requirements is carried out annually by QSE which analyse the legislation in force.

The following are operationally controlled:

- the fulfilment of the requirements dictated by the applicable legal requirements;
- the adequacy of the records with respect to the aforementioned requirements;
- the validity of the records.

The documentation and assessments resulting from the monitoring activities (Ref. A-0000-RDE-CMS-PRO-10-01-Monitoraggio) are input elements to the Management Review.

9.1.3. Analysis and evaluation

(§ 9.1.3 9001)

The company has prepared a specific management procedure (Ref. A-0000-RDE-CMS-PRO-10-01-Monitoraggio) in order to outline the responsibilities and methods of collecting, analysing and processing the recorded data to initiate proposals for improvement of the Management System during management reviews or when the importance of the data requires immediate action.

The company processes different types of data with the intention of taking initiatives aimed at satisfying the interested parties. They can be identified as follows:

a) records from the market relating to the quality perceived by the customer and any complaints;
b) records from the analysis of processes relating to the objectives defined for those that the company has deemed necessary to measure;
c) records from product controls.

With regard to point a), the company has outlined the procedures for the collection of test certificates and anything else that gives evidence of customer satisfaction (written declarations, disputes, etc.). Regarding complaints, these are treated together and similarly to the product / process NC, the methods of which are described in § 8.7 Control of Non-Conforming outputs and in the procedure "A-0000-RDE-CMS-PRO-09-01-Produzione".

With regard to pos. b), the same procedure defines the methods for processing data from:

- internal, and third parties;
- the controls of the processes regarding the defined objectives;
- from the verification of corrective and preventive actions;
- from the verifications of the objectives defined during the management reviews which are not included among those indicated above.

With regard to pos. c), the same procedure defines the actions for handling conformities and Non-Conformities of the material / product / service. These records include those provided by third parties, suppliers, customers and third parties.

The data and the results are present in spreadsheets that allow evaluations related to the needs of the expected results.

It is the responsibility of QSE to develop a report at the end of each year describing the results of the analysis and proposing objectives and improvement actions in order to discuss them during the management review.

Data analysis represents for the company the standard reference for monitoring the performance of the system, with the intention of managing the improvement.

The process interacts with all the other operational activities, from which it receives data and information for the analysis and the conclusions that are reported to management; this has been highlighted several times in the various chapters and paragraphs of this Manual.

9.2. Internal audit

(§ 9.2 9001 - § 9.2 14001 - § 9.2 45001)

Internal audit management methods and auditor qualification criteria are managed by the QSE (Ref. A-0000-RDE-CMS-PRO-10-01-Monitoraggio). The QSE organizes, plans, and carries out internal audits. The summary of the results is always evaluated during the Management review; the decisions arising from the review could produce changes to the management system (continual improvement).

9.3. Management review

(§ 9.3 9001 - § 9.3 14001 - § 9.3 45001)

C-HRQ-DIR examines the performance of the QHSE system in order to define any new possible improvement action. Meetings for the Management Review are scheduled at least once a year and / or after any significant event that requires a review or update of the Management system, or part of it.

The inputs derived during this meeting allow to understand the performance of the Management System and analyse the data.

The outputs aims for continual improvement and any new action or specific change. The Management review is archived as documented information of the QHSE management system.

The System Documents that guide this process are listed below:

A-0000-RDE-CMS-PRO-10-01-00-Monitoraggio.

10. IMPROVEMENT

10.1. Improvement

(§ 10.1 9001 - § 10.1 14001 - § 10.1 45001)

Each new opportunity for the improvement of the company is normally discussed during the annual Management Review and represents the main output of such activity (eg. New goals, new resources, specific training, etc).

10.2. Nonconformity and corrective action

(§ 10.2 9001 - § 10.2 14001 - § 10.2. 45001)

Any work process is adequately monitored in order to guarantee the state of compliance with any applicable obligation, in order to achieve the expected objectives and to satisfy the company policies.

Audits, inspections and monitoring actions allow the analysis and improvement of the organization's performance.

Any positive or negative observation, whether notified and recorded to initiate an action or trace a record, belongs to this process.

Examples of this type are listed below:

- Negative outcome of any checks carried out on incoming goods (including documentary and physical control of the goods), on production / construction and on completed works;
- Positive feedback on construction site, such as exceeding the established target with respect to what was planned;
- Negative outcome of the monitoring activities carried out during the execution of the works relating to the environment and QHSE management;
- Complaints from stakeholders during the development of the contract or company activities;
- Failure to comply with the requirements of the ISO standards and the Management System;
- Accidents, injuries and "near miss", whether attributable to RIZZANI or subject to its control;
- Any situation of exemption from the obligations signed by the company with the relevant subjects (contracts, declarations of commitment, etc.) as well as applicable legal provisions.

Any Non-Conformities are recorded and analysed in order to instantly manage the matter and identify the root cause and the related corrective action.

Collecting information on applied NCs and CAs will support system improvement and increase corporate resource growth.

For further information, please refer to the A-0000-RDE-CMS-PRO-11-01-Nonconformity;

10.3. Continual Improvement

(§ 10.3 9001 - § 10.3 14001 - § 10.3 45001)

Each internal process is periodically analysed by following the concepts of the Deming cycle (Plan, Do, Check, Act).

This approach guides the development and implementation of the necessary actions on the improvement process of each company, it also let the control and evaluation of performance, and finally allows the identification of any changes necessary to improve internal performance and achieve the expected results .

Any need related to a process, as well as any matter related to NC, Accidents, Complaints, etc, represents the starting point for developing an improvement program.