



MANAGEMENT AND ORGANIZATION MODEL

Article 25 septies L.D. 231/01

Adequate to prevent the crimes of manslaughter and serious or grievous bodily harm in violation of safety regulations and the protection of health and safety at work

Issued by: Board of Directors

Date/ Review: 12/10/10



INDEX

1	INTRODUCTION	4
2	LEGISLATIVE AND REGULATORY	4
2.1	Legislative Decree 231/2001	4
2.2	Legislative Decree 81/2008.....	5
3	DESCRIPTION OF THE COMPANY AND METHOD OF PREPARATION OF THE MODEL	7
3.1	Presentation of BTS SpA	7
3.2	Administrative forms	7
3.3	Preliminary analysis of risks, chose of the model adopted, sensitive areas	8
4	CHARACTERISTICS AND CRITERIA FOR MANAGEMENT OF THE MODEL AND DOCUMENTATION	10
4.1	Organizational and management model.....	10
4.2	Criteria for defining the model.....	10
4.3	Criteria for issuance, verification, review and updating. Communication Mode	11
5	SUPERVISORY BOARD	12
6	DISCIPLINARY SYSTEM	14
6.1	Measures applied for supervisors, employees and workers	14
6.2	Measures applied against executives.....	15
6.3	Measures against directors	15
6.4	Measures against trading partners, consultants, contractors and third parties in general	16
7	SPECIFIC REQUIREMENTS OF THE MODEL SUITABLE TO PREVENT CRIMES OF MANSLAUGHTER AND INJURIES OR GRIEVOUS BODILY HARM.....	17
7.1	Legislative Decree of 4 April 2008 and, in particular, Article 30 and Article 300	17



7.2	Sensitive activities and criteria for management and control	17
7.3	Organisation for health and safety and delegation system	18
7.4	Management System	23
8	REFERENCE DOCUMENTS	24
8.1	Corporate Organization.....	24
8.2	Code of conduct.....	24
8.3	Regulation Supervisory Board	24
8.4	Health and Safety Organization.....	24
8.5	Table of Correspondence with the Management System for Health and Safety guidelines to BS 18001:2007 and UNI Inail 2001	24
9	REVISION HISTORY	24



1 INTRODUCTION

The present document describes the Management and Organization Model which the CEO of BTS SpA has prepared to comply with the Legislative Decree 231/2001 in relation to offenses:

- **Manslaughter and serious or very serious bodily harm (Article 25 septies)**

2 LEGISLATIVE AND REGULATORY

2.1 Legislative Decree 231/2001

The Legislative Decree 231/2001 has introduced the offense of Bodies with legal personality of companies and associations without legal personality which individuals responsible for illegal actions related to them.

Based on the provisions of the Decree in question, the Bodies could be held liable in connection with certain offenses, specifically indicated, committed or attempted in the interest or to the advantage of the Bodies themselves by:

- Individuals who hold top management positions of representation, administration, management, or by one of its units, as well as persons who, de facto, the management and control of the Body;
- Persons subject to the direction or supervision of an individual in a top position.

That decree, which respects the principle contained in Article 27 of the Constitution, according to which criminal liability is personal and contains administrative penalties that will apply to legal persons will be liable for the criminal offenses, committed by directors, officers or employees in and the advantage of the same.

Article 6 of the Decree, in introducing the scheme of administrative responsibility, provides a specific form of exemption from such liability if the entity can demonstrate that:

- a) The governing body has adopted and effectively implemented, prior to the commission of the act, the organization and management are suitable to prevent the kind of crime that occurred;
- b) The task of supervising the functioning and observance of the models as well as updating them has been entrusted to a body with independent powers of initiative and control;
- c) Persons who have committed crimes and offenses have acted fraudulently evading these models;
- d) There has been no lack of or insufficient supervision by the Body referred to point in b).



Models must also meet the following requirements:

- Identify the activities where the possibility exists that they are committed crimes and offenses;
- Provide specific protocols aimed at planning the information and implementation of decisions in relation to the crime and illicit;
- Identify methods to manage idoneous financial resources in order to prevent commission of offenses;
- Provide duties to provide information to the Body responsible for supervising the observance and the operation of the models;

Introduce a disciplinary system to punish non-compliance with the measures indicated in the model;

- In relation to the nature and size of the organization and the type of activity performed, provide suitable measures to ensure that business is conducted in compliance with the law and to promptly detect and eliminate risk situations.

In accordance with the provisions of Legislative Decree 231/2001 and subsequent amendments and additions, the administrative responsibility of configuring with reference to the following general offenses:

- Crimes committed in relations with the Public Administration;
- Forgery of coins, credit cards and values;
- Certain types of corporate crimes, such as false corporate communications, false statement;
- Offenses relating to terrorism and subversion of the democratic order;
- Offenses against the person;
- Corruption in the private sector;
- Manslaughter and serious or grievous bodily harm;
- Receiving, laundering and use of money, goods or assets of illicit origin.

2.2 Legislative Decree 81/2008

Law 123 of August 2007, with the modifications set out in Art. 300 of the Legislative Decree 81/2008 introduced, among the crimes included in Legislative Decree 231/2001 Art 25f, manslaughter or injury or grievous body harm in violation of the protection of health and safety at work resulting in failure to make even the principals of safety and health at work.

Legislative Decree 81/2008 has amended the penalties provided (Art 300), differentiating according to the gravity of the damage or missing or incomplete risk assessment in organization with specific risks are particular significant (Article 55 paragraph 2 a) b) c)) and defined (Article 30) the minimal requirements of the Organisational Model pursuant to Legislative Decree 231/ 2001.

The law aims to define the important role of the Organization for the application of the rules of protection and protection in the Health and Safety at Work.



Please note that the manslaughter is defined in Article 589 of the Criminal Code and that unintentional injuries are serious and very serious defined in Art 583 and 590 of the Penal Code.



3 DESCRIPTION OF THE COMPANY AND METHOD OF PREPARATION OF THE MODEL

3.1 Presentation of BTS SpA

BTS SpA for over twenty years is concerned with measuring the movement of the human body in a clinical setting and to provide this information to researchers and clinicians interested in understanding thoroughly the dynamics.

The BTS SpA invented the integrated laboratory gait analysis (BTS ELITE) and helped thousands of patients with neuromuscular disorders to improve their condition through instrumental and objective assessment of their disability.

There is a huge need to understand the postural and movement issues caused by the onset of neuromusculoskeletal, and act promptly and appropriately, because they determine the quality of our lives.

There is a real need to evaluate patients in a comprehensive and multidisciplinary and everything can be done using the evaluation of the movement as a common factor.

There is a growing need to prevent the onset and the occurrence of these diseases through a better understanding of them because only by so doing can we speak of good health.

3.2 Administrative forms

The Board of Directors is composed of:

The President of the Board of Directors: Peretti Carlo with powers of legal representation of the Company and all powers for the ordinary administration of the same.

Chief Executive Officer: Ros Bruno with powers of signature

Councillor: Giussani Franco

The Board of Directors is vested with the broadest powers to manage the company, without exception, and especially the all faculties are recognized for the achievement of social goals, which are not by law or by statute placed explicitly reserved to 'shareholders' meeting. The management of the company is controlled by a board consisting of 3 members and 2 alternates shall remain in office until approval of the financial statements as at 31/12/2010.



The Board of Auditors is composed of:

Chairman of the Board of Statutory Auditors: Gianfranco Peracin

Auditor: Marco Chioatto

Auditor: Alberto Giobbi

Alternate Auditor: Roda Giancarlo

Auditor: Laura Maria Sangiorgio

The company organization is spread over the intranet.

3.3 Preliminary analysis of risks, chose of the model adopted, sensitive areas

The Company has adopted by resolution of the Board of Directorsthe Present Model of organization, management and control (hereinafter "the Model"), in compliance with the provisions of Legislative Decree no. 231/2001 for the prevention of crimes of manslaughter or culpable serious or very serious. The preparation and updating of the Model is the result of a process that involves complex and the construction of a series of activities aimed at building a system of prevention and risk management in accordance with the instructions contained in Legislative Decree no. 231/2001 and the Confindustria Guidelines (2008).

The activities implemented could be summarized as follows:

1) Identification of risks. This activity is carried out through the examination of company documents (organization, main business procedures, minutes of board meetings, powers of attorney, material relating to the system of governance of the Company and other relevant documentation) and a series of meetings with key stakeholders of the structure company (Directors, General Manager, Head of the Accounting Department, in charge of Human Resources and Organization, etc.). aimed, firstly, to identify sensitive activities for the purposes of Legislative Decree no. 231/2001 carried out in the organization and, therefore, to deepen the ways of carrying out these activities and to verify the existence of any existing controls (eg existing procedures, verifiability, traceability, consistency and coherence of transactions, segregation of duties, documentation of controls).

The merits of the hazard identification and analysis of risks relating to the Health and Safety specific reference is made to the document prepared pursuant to Legislative Decree no. 81/2008 Art .28.



The analysis of the business environment is intended to identify in which areas and in which way they can possibly be made offenses of the kind provided for by Legislative Decree no. 231/2001, and to identify areas of activity that should be considered sensitive to Legislative Decree. 231/2001.

2) Processing control standards apply. Following the identification of categories of activities in society to be considered sensitive for the purposes of Legislative Decree no. 231/2001, have been prepared on the basis of the principles and guidance contained in the Confindustria guidelines and international regulations, standards specific control that must be implemented in the company in carrying out the above activities.

3) Comparative analysis. In order to detect the ability to respond to the requirements imposed by Legislative Decree no. 231/2001 is carried out the comparative analysis between the organizational model and the existing control and the principles of the reference model defined in accordance with Legislative Decree no. 231 / 2001.

4) Preparation of the Model. At the end of the process described above is prepared the Model pursuant to Legislative Decree 231/2001. The model adopted by the company consists of a general part and a part relating to the specific requirements with reference to the above mentioned crimes.



4 CHARACTERISTICS AND CRITERIA FOR MANAGEMENT OF THE MODEL AND DOCUMENTATION

4.1 Organizational and management model

The Model comprises a body of principles, rules, regulations, organizational plans and their duties and responsibilities, the practical implementation and diligent management of a system of control and monitoring of the activities identified as sensitive activities for the purposes of Legislative Decree no. 231 / 2001. Its function is therefore in the preparation of a comprehensive set of procedures and control activities that have the objective of reducing the risk of commission (or attempted commission) of the offenses provided for by Legislative Decree no. 231/2001 and considered to be significant for activities of BTS SpA, through detailed correspondences with procedures and practices designed to eliminate or reduce the risks present.

The characteristics of the model are first described in this document and in the documents referenced directly, even in the management systems adopted, in particular:

- Organizational corporate
- Code of Conduct
- Regulations of the Supervisory
- Operational procedures and management

For offenses identified in the sections dedicated, set out the criteria reference to the specific documentation.

4.2 Criteria for defining the model

The model was defined in accordance with the instructions contained in Legislative Decree no. 231/2001, in the Confindustria Guidelines and in accordance with Article 30 of Legislative Decree no. 81/2008 for the part relating to offenses relating to Health and Safety on the job.

In developing the model were considered the procedures and control systems already exist and operate within the company, as well as known on the basis of the documents reviewed and interviews conducted.

The aforementioned set of procedures, rules and principles, which forms part of the model has been integrated according to the following principles:

- Compliance with the identification of the tasks in the execution of the activities deemed sensitive for the purposes of the Legislative Decree no. 231/2001;
- the need for appropriate business rules to regulate the activities sensitive for the purposes of Legislative



Decree no. 231/2001;

- guaranteed traceability and verifiability of the relevant assets pursuant to Legislative Decree no. 231/2001;
- the existence of formal powers consistent with the organizational responsibilities assigned, in the performance of sensitive activities for the purposes of Legislative Decree no. 231/2001, calling specifically for the protection of Health and Safety as required by Legislative Decree 81/2008 through an articulation of the functions that ensure technical skills audit, management and control of risk.

Were also identified specific reference standards regarding sensitive activities in relation to individual offenses expected.

In compliance with the provisions of Legislative Decree no. 231/2001 and in paragraph 3 of article 30 Legislative Decree 81/08, in the model it was decided to:

- develop a Code of Conduct;
- establish the Supervisory Board, with independent powers of initiative and control, which has been entrusted with the task of supervising the functioning and compliance with the Model and the maintenance over time of the eligibility conditions of the measures taken;
- provide information obligations towards the Supervisory Board in relation to sensitive activities for the purposes of Legislative Decree no. 231/2001;
- provide a communication activity targeted behavioral rules and established procedures;
- Establish periodic reviews of activities to be considered sensitive for the purposes of Legislative Decree no. 231/2001 and updating;
- introduce a disciplinary system appropriate to sanction non-compliance with the measures indicated in the Model.

4.3 Criteria for issuance, verification, review and updating. Communication Modes

Documents

- Organization and Management
- Code of Conduct

are emitted from Board of Directors and verified by the Supervisory Board.

The Board of Directors shall review and where necessary update, these documents as a result of:

- organizational change and business;
- changes in the legal framework;
- reports of the Supervisory Board in relation to significant infringements of the provisions of Legislative Decree no. 81/2008.



Responsible to monitoring the actual update is the Supervisory Board.

The document "Rules of the Supervisory Board" is issued and updated so unquestionable that the Body itself will notify the Board of Directors and all the functions involved.

The principles contained in the Model have, first of all, the purpose of determining the full awareness, the potential perpetrator of a crime provided for by Legislative Decree no. 231/2001, of committing an offense and, consequently, to make informed that the commission of such an offense is strongly condemned by the Company.

For this reason the content of the Model and the Code of Conduct must be communicated to the staff of the company, and especially by those who are to be involved, directly or indirectly, in sensitive activities pursuant to Legislative Decree no. 231/2001.

Also, since the Model and the Code of Conduct are addressed to all those who work for the achievement of the objectives of the Company, the same shall be informed, as well as to employees of the Company, even to those who, while not covering the status of formal employee, working for the achievement of the objectives of the Company under contracts, and over which the Company is able to exercise any direction or supervision.

5 SUPERVISORY BOARD

According to the provisions of Legislative Decree no. 231/2001 (Article 6, paragraph 1, lett. B), the person to whom the governing body must assign the task of supervising the functioning and compliance of the organization, management and control, as well as updating it, it must be "a body with independent powers of initiative and control."

This point was taken up by paragraph 4 of Article 30 of Legislative Decree no. 81/2008 provides that "...an adequate system for monitoring the implementation of the same model and the maintenance over time of the eligibility conditions of the measures taken".

Therefore it is established, in addition to the different systems of internal control, a Supervisory Board (SB) with the specific task of supervising the functioning and compliance of the organization and management and updating them.

The main requirements of the Supervisory Board, as proposed by the Guidelines for the preparation of the Models of Organization and Management issued by Confindustria and endorsed even by judicial bodies in the various court rulings published, can be identified as follows:

- autonomy and independence: the body must be inserted as a staff unit in a hierarchical position as high as possible and should be expected to carry over to the top management with operational. In addition, the ends



of the same organism must not be attributed operational tasks that, by their nature, it would jeopardize the objectivity of judgment (eg. Prevent the appointment of someone who is directly involved in the execution of sensitive activities);

- professionalism: the organization must have a wealth of knowledge, tools and techniques needed to effectively carry out its activities;
- continuity of action: requirement to ensure effective and consistent implementation of the organizational model;
- integrity: in order to highlight not to be in progress, even for individual participants, situations or judgments concerning offenses referred to.

The Board of Directors has appointed, with power of attorney members of the Supervisory Board.

The Supervisory Board has autonomous powers of initiative and control, have adequate resources and its components cannot be prejudiced as a result of the activity in the performance of their duties.

In particular, the SB used to perform the monitoring duties imposed by Legislative Decree 231/2001, of the appropriate professionals, for which they are defined qualification criteria checked on the basis of the curricula vitae collected (but not limited to: knowledge of legislation on health and safety, inspection and investigation skills, qualification in the management of systems).

The SB has the right to access to all the documents and all the local BTS SpA in order to better carry out his duties.

It is mandatory for any employee, in response to a request by the SB or the occurrence of the relevant events, to provide any information requested.

The SB reports at least once every six months to the Managing Director on the implementation of the model and on the possible detection of critical aspects.

It is obligation of the Supervisory Board to report any violation of the model that is detected.

Each employee or contractor of the Organization must report any violation of the model to his direct manager (as per the attached organization chart), with the latter's obligation to report to the SB. In case of urgency is allowed direct feedback.

The report may be made on a confidential basis and the author of the same will not suffer discrimination or prejudice because they find in the report.



In particular, even in the absence of a violation of the model, should also be reported to the SB accidents, occupational diseases and any situation of risk that is found.

All information, reports and data sent to the SB are guarded by the same and cannot be disclosed.

6 DISCIPLINARY SYSTEM

Article 6, paragraph 2, letter. e) and Article 7, paragraph 4, letter. b) of Legislative Decree no. 231/2001 establish (referring both to individuals in apical positions and the subjects of others) required the preparation of a disciplinary system to sanction non-compliance with the measures indicated in the Model of organization, management and control.

The sanctions, commensurate with the violation and deterrence, applicable to infringements of the measures contained in the Model is intended to contribute to the effectiveness of the model itself and effectiveness of the control of the Supervisory Board.

The penalties provided for by the disciplinary system will be applied to any violations of the provisions contained in the model regardless of the conduct and outcome of legal proceedings initiated by the judicial authority, in the event that the conduct to be punished integrate the details of a crime relevant pursuant to Legislative Decree no. 231/2001.

The penalty system also provides, for all employees, failure to pay the premiums provided for achieving the objectives of improved performance related to health and safety.

6.1 Measures applied for supervisors, employees and workers

Compliance with the provisions and rules of conduct laid down in the Model constitutes compliance by the employees of the company obligations under Article 2104, paragraph 2, the obligations of which the contents of the same model is substantial and integral part.

The breach of any provisions and rules of conduct in the Model by employees of the company always constitutes a disciplinary offense.

It should be noted that employees who do not hold the executive are subject to the following National Collective of work:

- Metalworking Small and Medium Enterprises.

The measures set out in the Model, which means non-compliance sanction, are communicated through internal circular to all employees, posted in a place accessible to all and binding for all employees of the BTS SpA.

The disciplinary measures are imputable to employees in accordance with article 7 of the Law of 20 May 1970. 300 (the "Workers' Statute") and any special regulations apply.



At the news of a violation of the model corresponds to the initiation of the investigation of deficiencies in accordance with the national collective bargaining agreement applicable to the specific employee affected by the procedure. Therefore:

- in each notice of violation of the model is given impetus to the Inquiry;
- in the event that, as a result of the procedure is established that the violation of the model, it imposed the disciplinary sanction provided for by the applicable national collective bargaining agreement;
- the sanction imposed is proportionate to the seriousness of the violation.

More specifically, on the assumption of the investigation of the violation, at the request of the Supervisory Board, after consulting the superior of the employee's behavior, the Head of Human Resources and the Executive Director, identify - analyzed the reasons for the employee's - the disciplinary sanction applicable under National Collective Labour.

After applying the disciplinary sanction, the Head of Human Resources announces the disciplinary sanctions that the Supervisory Board.

The Supervisory Board and the Head of Human Resources shall monitor the application of disciplinary measures.

All the requirements of law and the contract relating to the imposition of a disciplinary sanction are respected, as well as the rules, regulations and guarantees provided for in Article 7 of the Statute of Workers and the specific national collective bargaining agreement applicable to disciplinary action.

6.2 Measures applied against executives

In case of violation of the model by managers, established pursuant to the preceding paragraph, the BTS SpA adopts, against those responsible, the extent deemed most appropriate.

If the violation of Model undermines the relationship of trust, the sanction is the dismissal for just cause.

6.3 Measures against directors

The notice of violation of the provisions and rules of conduct of the Model by members of the Board of Directors, the Supervisory Board shall promptly inform their auditors and the full Board of Directors. The recipients of the information of the Supervisory Board will assume, as required by statute, appropriate action including, for example, the convening of the shareholders in order to adopt the most appropriate measures provided for by law.



6.4 Measures against trading partners, consultants, contractors and third parties in general

The violation by trading partners, consultants, contractors or other persons having contractual relations with the Organization of the provisions and rules of conduct established by the Model applicable to them, or the possible commission of the offenses referred to in Legislative Decree no. 231 / 2001 by themselves, will be punished in accordance with the specific contractual clauses to be included in the contracts. These clauses, making explicit reference to compliance with the provisions and rules of conduct provided by the Model may include, for example, the obligation on the part of these third parties, not to adopt or maintain behaviors such acts to cause a violation of the Model by the company. In the event of breach of this obligation, it must be deemed to have terminated the contract with possible application of penalties. It is of course without prejudice to the prerogative of the company to claim compensation for damages resulting from the violation of the provisions and rules of conduct contained in the Model by these third parties. The third-party companies are held to account, in particular for the management of health and safety code of conduct adopted by the BTS SpA and to operate fully to achieve the maximum protection of health and safety for the society where they operate, in the case other than the company reserves the right to dispose of the removal.



7 SPECIFIC REQUIREMENTS OF THE MODEL SUITABLE TO PREVENT CRIMES OF MANSLAUGHTER AND INJURIES OR GRIEVOUS BODILY HARM

7.1 Legislative Decree of 4 April 2008 and, in particular, Article 30 and Article 300

In the field of Health and Safety Article 30 of Legislative Decree no. 81/2008 indicates that the model is suitable if it guarantees effective business system for the fulfillment of all legal requirements, and the recording of assets due, in relation to:

- a) For respect of the technical and structural standards of the law relating to equipment, facilities, workplaces, chemical, physical and biological agents;*
- b) the activity of risk assessment and preparation of measures of prevention and protection;*
- c) organizational activities, such as emergencies, first aid, procurement management, regular safety meetings, consultations with workers' representatives for safety;*
- d) the activity of health surveillance;*
- e) to provide information and training for workers;*
- f) monitoring activities with regard to compliance with the procedures and work instructions in safety by workers;*
- g) the acquisition of documents and certificates required by law;*
- h) periodic verification of the application and effectiveness of the procedures adopted.*

For the corresponding parts, comply with the obligations set out the systems that take as reference the UNI INAIL 2001 Standard BS OHSAS 18001.

For this you have defined sensitive activities in relation to offenses of manslaughter and serious or very serious bodily harm and have identified specific standards.

7.2 Sensitive activities and criteria for management and control

Sensitive activities identified with reference to the offenses set forth in article 25 of Legislative Decree f. 231/2001 are as follows:

- Hazard identification and Risk Assessment and processing of the document Risk Assessment
- management of the legal obligations Health and Safety at work and recording of assets due



- definition of roles and responsibilities
- planning and management training, information and training
- communication and involvement
- procedures and practices under normal conditions, extraordinary and emergency preparedness and management of documents and records
- surveillance methodologies
- management of incidents and accidents
- audit and their planning
- action plans and improvement

The control system has been defined using as a reference the Confindustria guidelines which update March 31, 2008 as well as international standards.

Consequently, for each sensitive activity identified were identified specific modes of control.

7.3 Organization for health and safety and delegation system

The Board of Directors has identified the Employer in the Chief Executive Officer Mr. Bruno Ros has powers of ordinary and extraordinary administration through the minutes of the Board of Directors of the **XX.XX.XX**.

The **Employer** has delegated to Eng. Luke Minesso delegated obligations imposed by Article 18 of Legislative Decree no. 81/2008.

The Health and Safety Organization (referenced by this document) and the identification of roles and responsibilities relating to health and safety is managed by the Prevention and Protection and issued by the CEO.

In order to allow an accurate process management with specific reference to the protection of the mental and physical wellbeing of employees and in accordance with Article 30, paragraph 3, within the BTS SpA has implemented a system of "proxies" or a transfer of responsibility in load to the Employer, he has delegated to executives such as Mr. Luca Minesso for the seat of Garbagnate Milanese.

These delegations therefore correspond to the need to decentralize, as a function of participatory professionalism and differentiated experiences, the exercise of powers of management and control of the activity.

By virtue of the experience and teaching of case law cited, the system of internal delegation is formalized



explicitly by the editorial writing and gives the employer the specific task to organize the company so that each part of its attributes and skills can, and then it has an obligation to implement the provisions aimed at ensuring a safe work prescribed by law and / or imposed by the best technology, ensuring each operator a proper information and training to update and reaffirm constantly, vigilant and expect from anyone compliance with the provisions of the law and of the instructions given in order to protect the health and psycho-physical, punishing any deviance.

The conferment of the "delegation" is expected to be expressly and unequivocally accepted by the delegate signature for acceptance (as provided by Article 16 of Legislative Decree no. 81/08).

The delegated tasks are specifically indicated in the documents.

The professionalism of the delegates is edited and updated taking into account the experience gained through participation in specific training sessions.

The delegation of duties is accompanied by the transfer of autonomous decision-making powers and organization, and the transfer of autonomous spending power to an extent adequate to ensure compliance with the rightful caution imposed by law and / or the best technique, in order to ensure the Health and Safety at work.

In addition to the figures delegated and entrusted shown below, it also highlights the figure of the Workers' Safety (RLS) that, unlike the other figures mentioned, is elected by the workers union representatives preferably within the UN, but it is also a part of the Prevention and Protection.

Employer and executives

The Employer of the Company, assumes all obligations and duties under the laws in force and, in particular but not limited to Legislative Decree 81/08., Both in terms of health and safety at work, both in terms of responsibility towards the company:

- Defines the policy for Health and Safety and the company implements using the most appropriate tools to the sector;
- Process Risk Assessment document and verifies the constant updating in respect of all risks in the company, with the collaboration of business functions;
- Defines the methodology for risk control;
- Perform a periodic review of the activities carried out to verify the achievement of the objectives set
- Appointment of the Head of the Prevention and Protection Service (RSPP);
- Appointment of the Doctor;
- Define, with the support of the Prevention and Protection, improvement plans for the health and safety of workers, by providing the necessary resources and verifying its effectiveness;



- Gives the Delegation of functions taking into account the characteristics of professionalism and experience required by the specific nature of the delegated functions;
- Designate the workers responsible for the implementation of measures for fire prevention and fire-fighting, evacuation of the workplace, first aid and emergency management;
- Provides workers with the necessary and appropriate personal protective equipment;
- Require compliance by individual workers in existing legislation;
- It implements all the activities of information and training provided by law in the field of Health and Safety, periodically and in relation to specific risks in the company.

In addition, with the support of hierarchical functions (area managers) and of the Prevention and Protection:

- Establishes and ensures the requirements that must be met for the purchase, sale, loan for use of the machinery;
- Establishes, monitors and approves requirements for the purchase of products, the acquisition of external services, the award of the contract works of a construction or maintenance;
- Approve the plan for the ordinary and extraordinary maintenance of facilities and equipment, verify that the same is duly respected, defining responsibilities and skills of the personnel responsible;
- Currency with the Head of the Prevention and Protection risks to the health and safety of workers, in consultation with the Representative of the Workers' Safety;
- Organize Team Fire, Emergency Management and First Aid and approving plans for the management of emergencies;
- In entrusting tasks to workers takes into account the capacity and conditions of the same in relation to their health and safety;
- convenes the Annual Meeting of the Prevention and Protection;
- Check and approve procedures and operating instructions written on the subject of Health and Safety.

Workers

Each worker, as provided by law, shall:

- Taking care of your health and that of other people in the workplace;
- Comply with the instructions given by the Employer, for safety, for the purposes of collective and individual protection;
- The correct use of machinery, equipment, substances and preparations, means of transport, as well as the safety devices and other equipment department as instructed;
- Properly Use the personal protective equipment;



- Immediately report to the Employer the deficiencies of the equipment and safety devices on machines and plants;
- Do not remove or modify the safety devices, warning or control;
- Do not perform operations on its own initiative or maneuvers that are not under their control;
- Participate in training programs and training organized by the Employer;
- Undergo periodic health checks according to the health plan provided by the Competent Doctor.

Responsible of the Prevention and Protection Service (RSPP)

The RSPP, using existing resources within the Service for Prevention and Protection, is responsible, in accordance with Article 33 of Legislative Decree 81/08, in particular:

- Provide the identification of risk factors, risk assessment and the identification of measures for the safety and health of the workplace on the basis of specific knowledge of the company;
- To develop, to the extent applicable, the preventive and protective measures and control systems of these measures;
- Develop with the relevant sectors operating procedures;
- Ensure the implementation of security procedures for machinery and equipment, including audits;
- Propose news programs / staff training and provide information to workers;
- Participate in consultations concerning the protection of health and safety at work, as well as to the regular meeting.

Responsible of the Teams Fire, Emergency Management and First Aid

Responsibility, in accordance with the provisions of the current legislation, the rules of good practice, of:

- Check for fire prevention devices present in the wards, with periodic monitoring by external bodies;
- To inform the Employer of any changes or shortcomings;
- Ensure proper compliance by workers of the fire prevention rules and behaviors of workers;
- Intervene in case of emergency situations, training and information received, giving full cooperation to agencies in the case of their involvement;
- Check the contents of the first aid box and report any deficiencies to the owner of the material.

Workers Representative for Safety (RLS)

The Workers Representative for Safety (RLS), established at the regional level or sector, corporate and manufacturing site complies with the responsibilities set out in art. 50 Legislative Decree 81/08, in particular:

- Access to workplaces in which they performed;
- Is consulted in advance and in good time for the assessment of risks, the identification, planning, implementation and verification of prevention on the farm or production unit;



- Is consulted on the appointment of the manager and other employees in the service of prevention, fire prevention activities, first aid, evacuation of the workplace and the doctor;
- Is consulted on the organization and training of art. 37;
- Receive information and corporate documents relating to the evaluation of risks and prevention measures, as well as those relating to dangerous substances and preparations, machinery, plant, the organization and the workplace, occupational accidents and occupational diseases ;
- Receives information from the security services;
- Receive adequate training and in any event not less than that provided for by art. 37;
- Promotes the development, identification and implementation of appropriate preventive measures to protect the health and physical integrity of workers;
- Makes observations during visits and inspections carried out by the competent authorities, from which it is, as a rule, heard;
- Participate in the regular meeting of art. 35;
- Makes proposals for the prevention activities;
- Warns the manager of the risks identified in the course of its business;
- Can make use of the competent authorities if it considers that the measures of prevention and protection from the risks taken by the Employer or by the leaders, and the means to implement them are not fit to ensure the safety and health at work;
- Receives copy of the Document of Risk Assessment at its request and for the performance of its function;
- Receive a copy of the document for the evaluation of interference risks at his request and for the performance of its function;
- Is bound by confidentiality and industrial compliance with the provisions of Legislative Decree 196/03 regarding the information contained in the documents of the risk assessment and work processes of which it is aware in the course of his duties.

The RLS must also have the time necessary to perform the assignment without loss of pay, and the means and spaces necessary for the exercise of the functions and authority conferred, including access to the data contained in Article 18, paragraph 1, letter r), contained in computer applications. Cannot suffer any prejudice as a result of the conduct of its business and on comparisons apply the same protections as provided by law for the unions.

The exercise of the functions of the Workers' Safety Representative is incompatible with the appointment of Responsible Officer or to the Prevention and Protection.



Doctor

The tasks of the Doctor, as provided by law, are:

- Carry out health surveillance where provided, and if the employee so requests;
- Carry out preventive medical examinations for the purpose of assessing the suitability for specific tasks;
- Carry out periodic medical examinations to assess and monitor the health of workers and assess his fitness for the specific task;
- Carry out medical examinations at the change of duties and termination of the employment relationship (in the cases provided by law);
- Express the assessment of their suitability or otherwise for specific tasks;
- Participate in consultation and Risk Assessment in load to the Prevention and Protection provided by law, in conjunction with the Employer.

7.4 Management System

For the corresponding parts, the Management System for the Health and Safety certificate in accordance with the requirements of BSI OHSAS 18001:2007 is the organizational model that the BTS SpA has adopted to prevent offenses of manslaughter and serious or grievous bodily harm.

This document makes reference to a concordance table that defines clearly the relationship between the dictates of legislation and the requirements of the standard, making it possible to check all documentation specific operational.



8 REFERENCE DOCUMENTS

8.1 Corporate Organization

8.2 Code of conduct

8.3 Regulation Supervisory Board

8.4 Health and Safety Organization

8.5 Table of Correspondence with the Management System for Health and Safety guidelines to BS 18001:2007 and UNI Inail 2001

9 REVISION HISTORY

REV. 0 gg/mm/aa Initial Revision