

## **COMPANY POLICY**

The Corporate Management of LTL S.p.A., in accordance with the ESSILOR Principles, considers the occupational health and safety of workers, the qualification of its products and services as well as the protection of the external environment to be priority aspects. In this regard, it is proposed to make organisational, technical and economic resources available with the aim of continuously improving these aspects. To this end, it has decided to establish, maintain, document and implement, as an integral part of its work organisation, an Integrated Quality, Safety and Environmental Management System as a Managerial style, in accordance with the requirements of ISO 9001, ISO 13485, ISO 14001 and ISO 45001, as well as the requirements of Regulation (EU) 745/2017 on medical devices (MDR), for all medical devices for which the company is manufacturer, importer or distributor, complying with and pursuing the following objectives:

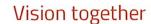
- To ensure products/services based on utmost customer satisfaction and, more generally, that of all stakeholders; LTL S.p.A. defines attention to customers and stakeholders as the reference principles of its Integrated Policy. LTL S.p.A. undertakes to understand the needs of its customers and plans its activities to fully satisfy them. In the same way, it operates in compliance with the demands and requirements of the target market of the country in which it operates, complying with laws and regulations in both the environmental as well as the occupational health and safety field.
- Improve to achieve increasingly higher goals aimed at reducing the consumption of natural resources, polluting emissions and waste production, starting from compliance with current and future legal requirements. To this end, training is the main tool for promoting change and continuous improvement of behaviour at all levels of the corporate organisation. Everyone will also be assessed based on the achievement of these goals.
- Perform monitoring of both products and production processes in order to meet the needs of internal and external Customers, and prevent the occurrence of hazardous situations in both the environmental as well as safety fields.
- Ensure compliance with all mandatory legislation in the field of occupational health and safety, environment and requirements applicable to products, all with the aim of fulfilling both legislative obligations and having utmost cooperation and transparency towards supervisory bodies and business organisations.
- Effectively communicate the commitment that the Company is making to customers, the environment and occupational
  health and safety to all stakeholders, ensuring consultation with the Workers' Safety Representatives, illustrating work
  programmes and results achieved.
- Design, develop and manage activities, processes and products by pro-actively, strategically and in a documented manner
  assessing in advance the possible impact on the environment and on occupational health and safety, identifying as soon
  as possible the best available solutions to eliminate, reduce or improve any impact on the internal and external
  environment.
- Regularly assess and monitor suppliers of raw materials in the sense of marketed products, in order to guarantee Customers a product that meets applicable technical as well as environmental requirements.
- Assess and monitor suppliers of plant, machinery, equipment, substances and/or chemicals and services in order to obtain
  products in line with mandatory requirements while safeguarding occupational health and safety and the external
  environment.
- Involve all temporary and other personnel and collaborators, through constant information, education and training aimed
  at raising awareness, of the risks inherent in the performance of their duties and of the health and safety measures to be
  adopted, of the requirements necessary to obtain products and services in line with innovative standards, while at the
  same time ensuring respect for the external environment. Evidence of the above through the preparation of specific
  training courses.
- Put in place and, if necessary, implement the appropriate technical and organisational measures to prevent and effectively
  deal with any emergency situations during the work activity that may involve risks of environmental accidents and/or
  those involving employees or other people.
- Prioritize preventive actions and detailed investigations aimed at reducing the probability of occurrence of accidents, injuries and/or occupational diseases or lack of compliance with product requirements.
- Identify a process approach for all parties involved in its critical processes in order to plan, control and continuously improve the resources for their implementation.
- Manage its processes in such a way that they are unambiguous for the purpose of achieving expected outcomes.
- Take the related responsibility for and the resources deployed for the effectiveness of its IMS, making available all necessary resources and ensuring that the planned objectives are compatible with the context and strategic quidelines.

LTL S.p.A.

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- Communicate the importance of the IMS and actively involve all stakeholders, coordinating and supporting them.
- Assess risks and opportunities by planning it processes with a risk-based thinking approach in order to implement the
  most appropriate actions; address the risks associated with its processes; exploit and reinforce the opportunities identified
  to promote an appropriate sense of proactivity in managing its risks at all levels.
- Involving personnel and stakeholders ensures that LTL S.p.A. is aware that the involvement of personnel and all stakeholders, together with the proactive participation of all collaborators, are a primary strategic element.
- Promote the development of in-house professional skills and the careful selection of external collaborations in order to have competent and motivated human resources.
- Make improvement of the performance of its IMS a permanent objective. Preliminary assessment of risks and opportunities related to corporate processes, internal and external auditing and management reviews are the tools that LTL S.p.A. puts in place in order to ensure constant improvement. The tool chosen by LTL S.p.A. for the pursuit of the Integrated Policy is a Management System in accordance with the UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, ISO 45001:2018 and ISO 13485:2016 standards.

This policy is based on the awareness that it requires the utmost commitment and participation of all those working in LTL for its implementation in a context of "continuous improvement". It is therefore communicated within the organisation for the purpose of its understanding and application.

The IMS policy will be periodically reviewed by the Management to ensure its continuous fitness for purpose. The Management undertakes to conduct a review of the IMS at least annually, as well as to ensure that adequate resources are made available.

San Vito al Tagliamento, 17/11/2023

Edi Stiz

General Management



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