

QUALITY AND ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

**In accordance with standards
UNI EN ISO 9001:2015
UNI EN ISO 14001:2015**

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REVISION HISTORY

DATE	REVISION	CONTENT
10/10/2017	00	First version of the document
20/01/2020	01	Integration with the UNI EN ISO 14001:2015 standard
28/01/2021	02	Improvement of raw material descriptions, service, waste production, organization
30/04/21	03	Insertion of more details on exclusion p.to 8.3
07/01/22	04	Improvement of some descriptions and points to give greater emphasis and evidence to the concepts expressed
17/02/23	05	Implementation of system details, clarification of product application fields and quality controls, insertion of details on personnel motivation / relationships with suppliers / social responsibility of company, organization chart update



3C CATENE SRL

10/02/25	06	Improvement of some descriptions and points to give greater emphasis and evidence to the concepts expressed. Commitment to the drafting of a sustainability report.
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COMPANY PRESENTATION AND CERTIFICATION OBJECT

3C Catene is a second generation artisan company, run by Walter and Luca Cortiana, sons of the founder Giampietro. It is located in Lecco, famous and recognized Italian wire district.

Since 1973 it has been specialized in the production of small welded and non- welded chains, and today it is the largest national manufacturer of welded chains from 1.30 to 3.90 mm in diameter, made of steel and stainless steel.

The customer segmentation consists of chain factories, wholesalers and companies that directly use the product.

Over the years it has progressively and constantly evolved both in the technical-production and in the commercial-organizational field. This factor has allowed it to gradually move from a subcontractor company for few clients to a protagonist in both the Italian and European market, conquering its own reference market.

The machine park (with related equipment) is made up of 34 bending-welding machines. It was completely conceived, designed and manufactured internally with the collaboration of specialized external companies. This is a strength that has allowed the company to refine the quality of its products more and more to be able to respond quickly and effectively to market requests and to obtain an automatic production cycle of great capacity and flexibility that has made the company a sector leader in Italy. This aspect also allows it to be very competitive in terms of the "quality - price" ratio and extremely flexible as regards functionality, size and shape of the products.

The organization has also grown at the same pace, focusing heavily on the competence of human resources and their full involvement in the company project, on process innovation and management control.

The certification of the Company Quality-Environment System was not only a goal but is instead considered a real starting point for the continuous improvement of the organization and its performance and results.

A key aspect for the constant and progressive growth of the company has been the fruitful synergy with strategic customers, suppliers and consultants – external collaborators as well as with associations and economic and scientific institutions of the area.

Standard production includes:

- GENOVESE welded chain, DIN 5685/1, DIN 5685/2, DIN 763, DIN 764, of various types
- Non- welded chain
- welded and non welded chain links

All products have a wire diameter within the range of 1.30 - 3.90 mm and the raw materials are iron and stainless steel.

Products are sold from catalogues, but it is possible to produce non-standard items at the customer's request (always within the dimensional range described above) thanks to the flexibility and versatility of the machinery and production process.

The standard materials used in the production of chains are :

- Steel : C4D-C7D tables UNI EN 16120-2 e Fe360B (S235JR) tables UNI 10025
- Stainless steel : AISI 304 e 316 tables EN 10088-3.

There is a diversification of supply for the areas of application of the product: hardware, agriculture and industry in general are the most important. The main uses of the produced chains, on the other hand, are: connections between movable and fixed parts – delimitation of paths or areas – support of small loads.

Process planning and monitoring, as well as effective on-line quality controls during the accessory activities of packaging until the release of the product, allow to guarantee compliance with specifications and tolerances declared in the catalogue with a constant quality of the chain produced from the first to the last link without differences between nominal and actual dimensions as well as in the weight-length ratio of the chain. In addition, all dimensional tolerances are smaller than existing standards and those of the competition.

The strong and strategic point of the service is the customization; finishes, sizes, packages and packaging of all products can be customized according to the needs of the client, their functionality and the final field of application.

Another very important advantage in terms of customization is the possibility of supplying custom-made cut link chains that can also be integrated with various assembled accessories to complete the product and increase its functionality. By doing so, items that are directly applicable in the various sectors of use are obtained with a clear advantage for the customer who does not have to incur additional cutting, assembly and packaging costs, also reducing the packaging volumes of the packages that in the end must be disposed of as waste.

The possible coatings are electro-galvanic treatments, hot-dip galvanizing and colour powder coating; non-toxic and/or non-harmful treatments for humans and the environment.

Also on the quantities of the supplies there is a lot of flexibility both for the delivery of large batches and for small volumes according to customer needs.

All packages bear a clear identification of the product (even with an internationally recognized EAN 13 barcode). It is also possible to manage supplies directly in the packaging or packages owned and branded by the customer.

The Company has decided to adopt and certify an Integrated Quality and Environment System, the scope of which is:

“Manufacturing and sale of metal chains”

The only point of 9001 which is not applicable is 8.3, as the product requirements are already translated into characteristics described in the catalogue. Therefore, the production carried out by 3C CATENE does not require the development of design activities. Any requests for new items considered out of standard catalogue by the customer are handled according to the procedures indicated in the relevant procedures by opening special quality plans. The new article is not the subject of design as it is produced on the same machines, with the same production process and with the same materials. What changes are the dimensions of the new chain and/or single link (diameter, length and internal width of the link) which, however, always fall within the range between 1.30 and 3.90 mm in diameter. For the realization of the new chain it is necessary to manufacture the related equipment composed of some simple mechanical parts which are produced in-house or entrusted to third-party mechanical companies according to company-owned designs.

These details are identical in type, shapes and materials compared to those usually used in the production process but differ in size depending on the size of the new article to be produced.

The Quality-Environment system is further integrated with regard to Health / Safety at work (although the latter area is not certified)

QUALITY, ENVIRONMENT AND SAFETY POLICY

PREMISE

The company policy is subject to constant verification (at least annually) and may undergo adjustments which by their nature will always be of the medium or long term.
It can be made available to the public in all forms that the Management considers appropriate.

QUALITY POLICY

The Quality Policy is constantly updated within the Management System, which has always been the preferred tool for efficient management of all the company's operating processes.
3C CATENE has taken the initiative to implement its Quality System essentially with a view to adopting precise standards of reference, to be officialized at all levels of the company, which allow to implement an effective control of all its processes through the formalization of well-defined procedures with the involvement of all the company functions.

STRATEGIC VISION

3C CATENE offers itself as a reference point for small welded chains, both for the Italian and European markets.

Starting from the customer's needs, it wants to be recognized as its partner and not just as a simple supplier: for the quality of the products and services offered, for its professionalism and reliability.

The reputation on the market is considered as important as the economic result to be achieved.

The Quality Management System ensures an efficient and flexible organization in which each employee must feel always as an active and responsible part within it.

The production process, on the other hand, guarantees absolute respect for health and safety in the workplace and for the products sold, always respecting the environment.

COMPANY MISSION

- 3C CATENE produces low carbon steel and stainless steel chains and links, welded and non-welded, with a diameter between 1.30 and 3.90 mm. The reference market is international and the type of customers includes chain factories, hardware wholesalers and direct users of the product. The main strategic levers are:
- THE PRODUCT
 - range of standard products in the catalogue available in stock
 - made to measures customizations for the customer both for articles and for finishes and packaging

- declared and guaranteed dimensions and specifications of the products. Consistency of quality in the supply
- safety of quality “100% Made in Italy”
- THE SERVICE
 - over fifty years of experience in the field that translates into high specialization and professionalism to the benefit of the client
 - maximum flexibility for supply volumes (for large batches as well as for a few hundred meters of chain)
 - short time, declared and guaranteed response
 - search for partnership relationship with the client to aim for its full satisfaction, going beyond the simple supply of material

GUIDING PRINCIPLES AND OBJECTIVES

- Customer satisfaction is the company's first objective.
- The quality of products and services, the professionalism and reliability of managers and operators, the efficiency of the entire organization must always be placed first in all business decisions and strategies.
- The continuous innovative search for greater efficiency, productivity and flexibility both in the operational departments and in the commercial - administrative area must be a constant company activity. However, this effort must not counteract:
 - the maintenance of environmental protection and the health / safety of workers as well as respect for them.
 - absolute respect on a human level for its employees.
- Every figure in the organization must always be involved in the company project and must share its philosophy. It is the teamwork that makes the difference and not the simple sum of individual work. Each employee must be aware of which are the areas of their competence and where to focus their efforts and times in line with the company objectives.
- Suppliers and external partners are an integral part of the company assets; they are also chosen on the basis of their willingness to share company objectives and not only in relation to the cost / service ratio offered. The satisfaction of external suppliers / partners in working together is constantly evaluated and monitored.

ENVIRONMENTAL POLICY

3C CATENE has decided to integrate its Quality System with an Environmental Management System according to the UNI EN ISO 14001 standard.

Therefore it defines the Policy within an Integrated System, a privileged tool for efficient management of all operational processes.

The Policy for the Environment aims to guarantee compliance with the current regulations and the respect and protection of the Environment.

It is defined taking into account the context and purposes of the company, including the nature, size and environmental impacts of its activities, products and services provided.

Environmental policy is the frame of reference for defining company objectives in this area.

It is constantly updated and formalized, as well as the policy of quality, at all company levels, to allow effective control of the entire process through the integration of existing procedures with the involvement of all company functions.

STRATEGIC VISION

3C CATENE undertakes to comply with environmental legislation and adopt specific strategies, in order to limit to the utmost the environmental impact of its production and management processes and of the waste production deriving from its activities.

GUIDING PRINCIPLES AND OBJECTIVES

- Environmental protection must be the point of reference for any company strategy.
- Each production process, in addition to the performance objectives and the search for maximum efficiency, must always take into account the prevention of pollution in all its forms.
- The fulfillment of general and local environmental regulatory requirements (legislative conformity) is only the basis from which to start, but the real objective is to increase its environmental performance over time.
- The continuous improvement of its environmental management system, as well as that of the integrated Quality-Safety system, must be placed in the foreground by the Management.

SAFETY POLICY

3C CATENE wants to manage Safety / Health in the workplace, considered to be an absolute priority in the company, in a single integrated system.

The Safety Policy aims to ensure safety in the workplace and preserve the health of operators as well as ensure products that are safe and not harmful to health and avoid negative impacts on the environment. It is constantly updated on the basis of current and binding laws on the subject and is made official, as well as that of quality, at all company levels, to allow effective control of the entire process through the integration of existing procedures with the involvement of all company functions.

STRATEGIC VISION

To create a corporate mindset in which each individual involved interprets "health and safety in the workplace" as a personal philosophy with established and conscious behaviors rather than merely as a legal obligation to be complied with.

Safety and health in the company are values to be pursued and constantly maintained through an efficient and well monitored organization.

All products sold must always be safe and must not put at risk the health of those who use them

GUIDING PRINCIPLES AND OBJECTIVES

- All subjects must be enabled to responsibly perform their respective tasks through adequate training / information and sharing / application of specific operating procedures for each business area and work phase
- The tasks and working methods are precisely defined, based on the risk assessment, to ensure the correct application of prevention measures over time. In order to obtain a single efficient Company System, all aspects related to health / safety / environment are integrated into the already certified Quality-Environment System.
- Periodic training of staff and responsible figures is provided on all issues relating to the legislation for safety and hygiene at work, by accredited trainers.
- Controls are ensured at all levels to guarantee the application of the law and company provisions as well as respect for the environment.
- The health protocol is regularly updated with the aim of constantly monitoring the protection of workers' health.

DIFFUSION AND SHARING OF POLICY

- a complete work of raising awareness on the guiding principles of Quality - environment - safety, on the company philosophy, on its strategic vision and on its mission must be disseminated within the company. This work will be carried out through general information disseminated to all employees (by the means deemed most appropriate), combined with technical information and continuous training of individual members and working groups as broad and complete as possible.
- the behavior and consistency of the Management are essential in pursuing vision and objectives as an example towards employees and collaborators
- To better diffuse the policy, a meeting of all staff is held. It can be repeated over time if changes are made. The principles that inspire the business are explained and reaffirmed, making explicit the objectives to be pursued during the meeting
- The company organization chart, which graphically represents the relationships of dependence and collaboration existing between the main organizational functions, is brought to the attention of the entire organization through its display in the places deemed most appropriate.
- Each function manager, as well as each employee, is informed of their duties and responsibilities related to the main business activities through a meeting during which the signatures are taken as evidence of acceptance of the proposed role.
- The periodic meeting of the management for the review of the system constitutes the starting point for the definition of objectives and policy changes that must be brought to the attention of all collaborators.

OBJECTIVES

- At the beginning of the year, the annual objectives for the Quality-Environment-Integrated Safety System, that the company considers appropriate, are defined, also defining the related action and improvement plans to be adopted for their achievement, which will be constantly monitored by the Management using all the quantitative and qualitative data in its possession.

These objectives are communicated (in the ways deemed most appropriate) to the different levels of the organization and at the operational level specified in a special document drawn up by the Management and annexed to the annual review of the Quality-Environment-Safety System.

- Objectives will be reviewed periodically adapting their extent in relation to changes in internal and external events of the organization, with the awareness that:
 - they must be specific, measurable, achievable, realistic, time-controlled
 - they must make a significant contribution to the progressive implementation and improvement of the system
 - they must be oriented towards obtaining results in order to achieve the customer's expectations and needs and for improving the performance of the organization.
 - are in line with the established policy
 - tend to reduce and possibly eliminate risks to the environment and to the health and safety of workers and sold products
- To achieve these objectives, various resources, economic, structural but above all human, will be made available; it will therefore be the responsibility of the Management to try to involve in the Management System every person who collaborates with the company, be it employees, external collaborators or suppliers.
- In setting objectives, management takes into account the situation of the market as a whole, including the behaviour of competitors and suppliers, factors arising from management review and customer satisfaction or dissatisfaction. It must be taken into account environmental, health and safety laws.
- to achieve the objectives set, the following actions shall be undertaken:
 - involvement of the staff and permanent collaborators contacted (including some strategic suppliers) to make them aware of their necessary contribution to their realization
 - diffusion and seeking agreement on the policy
 - request its collaborators to make suggestions for improvement in carrying out their activities, assessing their extent/implementation in line with economic/financial aspects as well as other organizational/managerial impacts
 - adoption of operating procedures for each process phase
 - increasingly effective controls and monitoring of operational activities
 - attention for the staff training
 - disposal of quantitative and qualitative data increasingly available, usable and precise

RELATIONSHIPS BETWEEN THE PARTIES

- It is essential to constantly analyse the results and expectations of all parties involved in the various areas and processes that fall within the scope of the Corporate Mission.
- Attention to the customer is demonstrated :
 - in the particular attention to detail with which his requests are analyzed during the commercial negotiation (from the moments of requests for offers to the definition of orders) to ensure the most suitable technical/economic solution
 - in the ability to respond to his requests and needs for customization, to satisfy him and make him loyal over time

- in the will to create a stable professional relationship of mutual interest with him going beyond the simple economic relationship of supply
 - in responding to any request with short and certain times
- The staff is motivated through active involvement in the application of the integrated company system. This involvement is pursued:
 - with training sessions, both of an educational and informative nature, which aim to develop the knowledge acquired according to the tasks that each one is intended to perform within the company.
 - in the accompaniment, throughout the working activity, with constant on-the-job training directly by the owner members. This support will make the transfer of knowledge more effective by transforming it into appropriate skills and behaviours and with a personal work vision consistent with the company's philosophy and policy.
 - with the creation of individual personalized growth plans that will also serve to verify that their personal objectives and their expectations are in line with those of the company.
 - with the direct involvement of each employee in order to report and document any suggestions and/or anomalies that may emerge as a result of internal controls, complaints and/ or needs gathered from customers, or for the Safety area (including "near misses"). The objective is to provide the whole organisation with a constructive tool based on objective data for its own continuous improvement.
 - with a reward system (both financial and other types of bonus) for those elements that demonstrate particular involvement in the company project and provide higher performance than the minimum trade union standards
 - With a welfare system, that offers a comfortable working environment on a human scale and that reconciles the performance of the profession and personal life as much as possible.
- The relationship with suppliers is expressed in the following ways:
 - In the periodic assessment activities which, taking into account the positive and negative events that occurred in the defined period, automatically lead to their selection over time.
 - In the search for partnerships aimed at mutual professional and economic satisfaction.
 - Any criticism directed at suppliers should initially be seen as a tool for improvement that may lead to either a positive or negative evolution depending on their behavior.
 - In the non-tolerance of their behaviors that risk compromising the company's objectives and jeopardizing the corporate reputation. Therefore, it will be necessary to always be objective and critical with them for the construction of a stable relationship based on mutual trust.
- The relationship with the public :
 - must ensure that any potential damages of any kind that may affect the local community and the environment as a result of carried out activities are examined, ensuring that the utmost effort will always be made to minimize negative impacts.
 - It must clearly specify its commitment to corporate sustainability through an appropriate report that shall be made available externally in the modes deemed most appropriate.
- 3C CATENE also wants to pay particular attention to Corporate Social Responsibility, intended as :
 - attention to its own socio-economic territory

- The interest towards all the values present within "doing business" and craftsmanship in general.
- The constant maintenance of ethical behaviors by every person in the organization
 - collaboration with schools, associations and social organizations for the training of young students and future workers and/or individuals in a weaker bracket for their entry or return into the world of work

It is instead pursued:

- through the active participation of the General Management in the economic and social fabric of the territory and by making available time and financial resources and expertise in system projects for the common good
- by diffusing, both within and outside the organisation, positive thoughts and messages on 'doing business' and 'craftsmanship', based on the assumption that economic results are not the only ones to be pursued but that, alongside them, all the values contained within the work, the craft, the territory and the human person must emerge.
- in the promotion and implementation, starting from the strategic project and reaching every single daily work activity, of ethical and responsible behaviour both individually and at the level of the entire organisation
- in maintaining a high level of corporate Welfare in which each employee can fully express him/herself in his/her work in a stimulating and rewarding environment, reconciling professional and personal life.
- in active participation in local projects concerning orientation and school-work alternation in collaboration with all forms of educational institution and with the associations involved to facilitate the entry of young people into the world of work and promote the values of work within of the school world
- in active participation in local projects concerning the inclusion of disadvantaged people in the working world.
- in the financing of specific projects in its own territory on social and charitable issues.

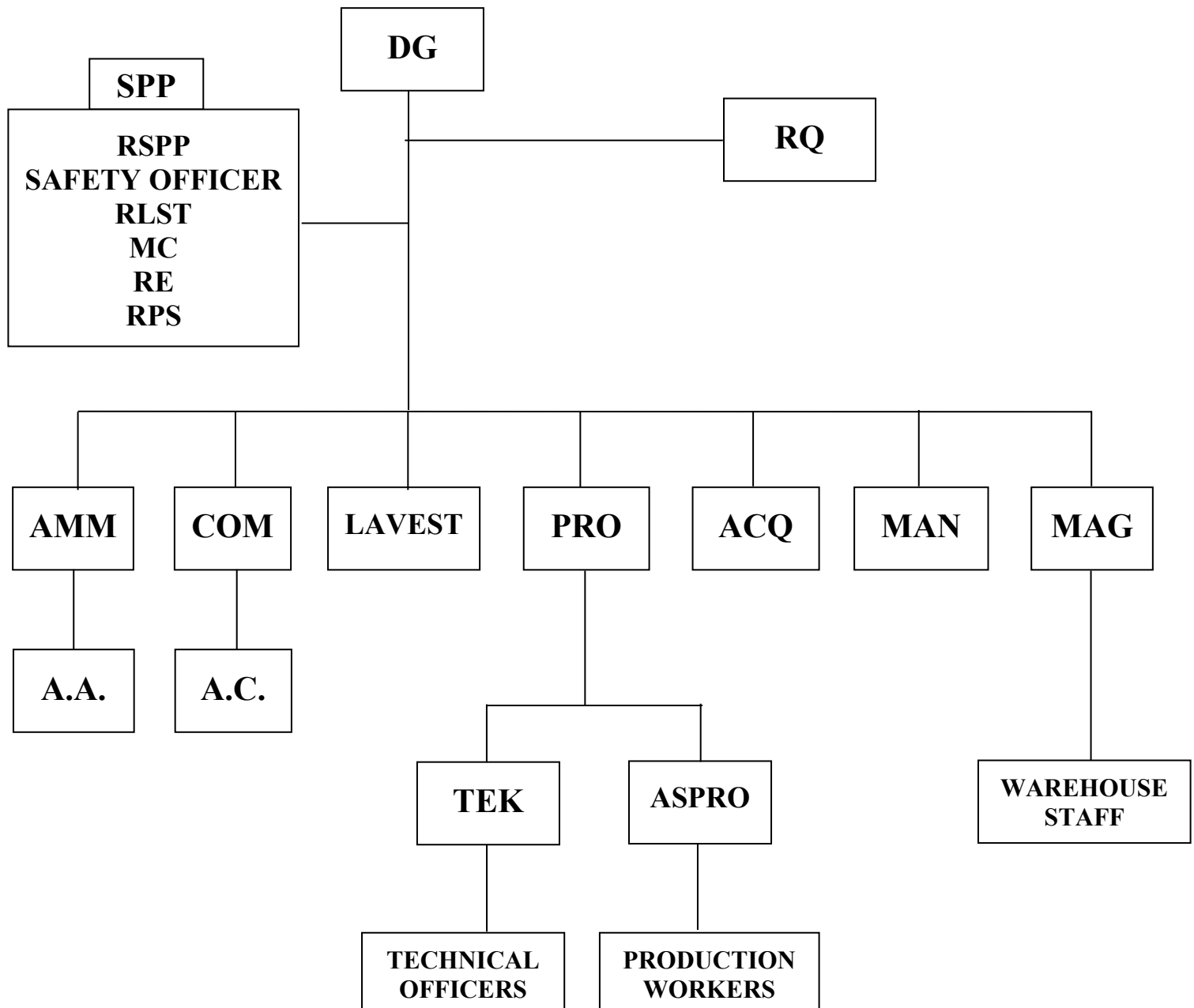
PLANNING AND REALIZATION OF THE SYSTEM

- For the planning of Quality, all the sectors that can influence the quality level of the products and services that the company offers its customers are considered.
- For the planning of Safety and respect for the environment, the regulations to be applied regarding health/safety in the workplace and respect for the environment are taken into account, based on the specific characteristics of the company.
- In order to ensure that the changes take place in a controlled manner and that the integrity of the system adopted is not damaged, the Management, in planning and implementing the Company's Quality-Environment-Safety System, will define that they are examined :
 - the individual processes governed by specific procedures and work instructions in which tasks and responsibilities are defined in detail and in which the resources to be used for carrying out the various activities are indicated.
 - The indicators achieved and the results of the various objectives planned for each business process.
- Particular attention shall be paid to:
 - the constant reduction of risks at any level, related to the processes and activities carried out, through their identification and the definition of management and control measures

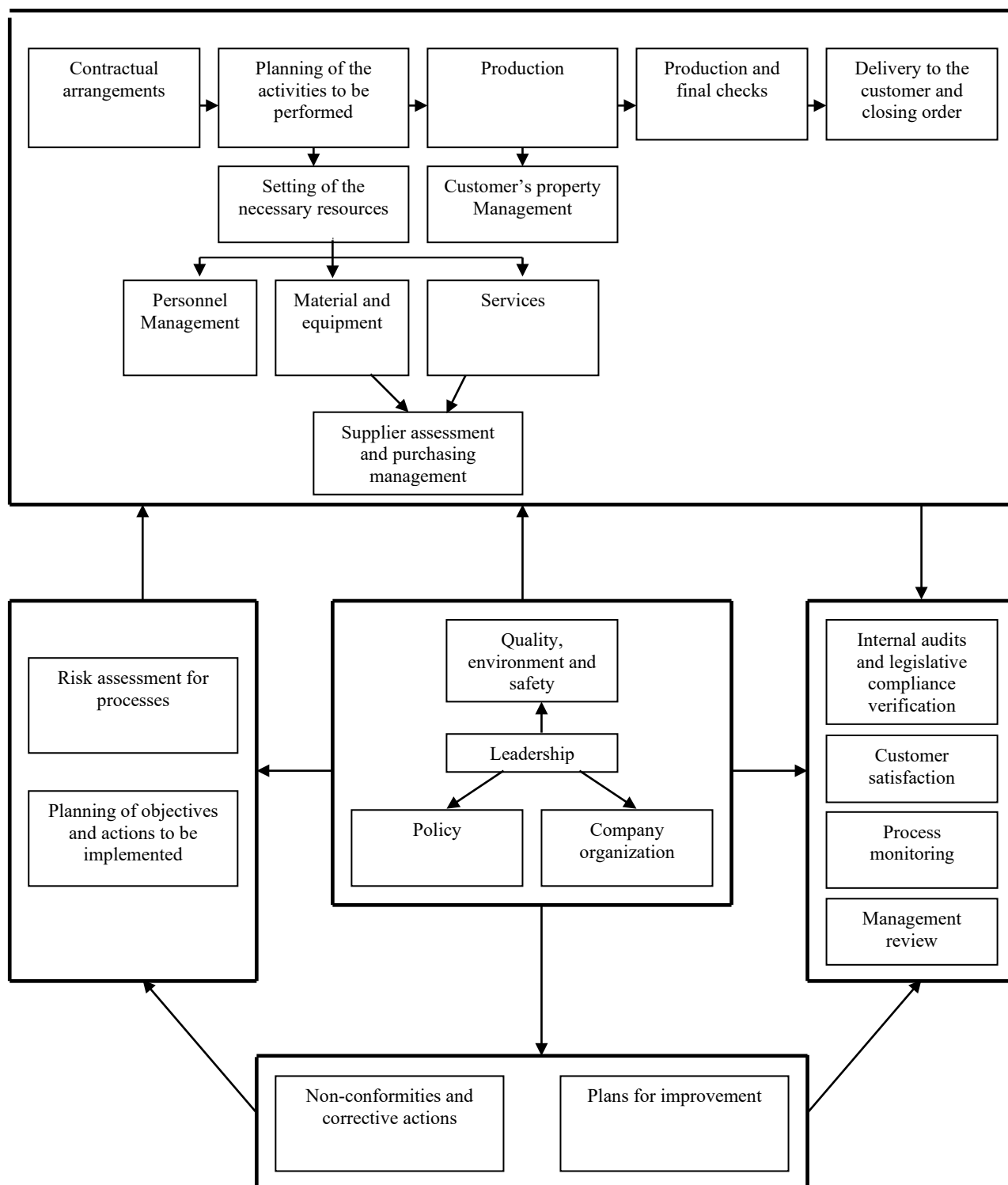
- the careful and precise analysis of the context in which the company operates and the identification of all interested parties and their expectations, in order to keep them under control, manage them and satisfy them

COMPANY ORGANIZATION

The company functional organization chart is shown below.



FLOW OF PROCESSES



LIST OF PROCEDURES

CODE	TITLE
PR 01	Document management
PR 02	Leadership
PR 03	Risources
PR 04	Non-conformities and corrective actions
PR 05	Performance evaluation and continuous improvement
PR 06	Commercial activity
PR 07	Supplies
PR 08	Production
PR 09	Environmental operational control