



policy regarding

**safety,**

**security &**

**environment**

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## Our top priority

**We make security, safety, quality and respect of the environment within the organisation and work procedures the top priority of both of our companies.**

It is a commitment of IRE and IRE ELiT's General Management and Supervisory Boards to regard the safety, security and environmental policy as a fundamental and key element of the organisation of these two companies. **The future of these two companies can only be developed on the basis of a well-established safety and security culture.**

It is therefore the General Management, with the agreement of their Supervisory Boards and, according to discipline, on the advice or decision of the Safety Department (where prevention advisors, certified physical control experts and physical protection delegates are employed), that defines the security, safety and environmental policy by translating it into the U.T.E Quality Management System.

The distinctive feature of IRE and IRE ELiT is that both of these companies are also nuclear operators (category 1 and 2 respectively) and pharmaceutical companies approved by the Public Health authorities. This feature is integrated into a single Common Management System, which brings together procedures, modus operandi and nuclear safety and security instructions (conventional and nuclear safety) to assure the protection of the general population, workers, and environment, as well as the companies' focus on the quality of their products, i.e. the safety of patients using the companies' products.

This document, which we place at your disposal, outlines and defines how this security culture is established and verified, and how the company's organisation ensures that resources are constantly adapted to fit the security, safety and environmental policies.

Happy reading!

# Our policies

## Security / Safety Policy

IRE and IRE ELiT make all of the human and material resources available that are needed to meet these optimal safety and security conditions. In particular, nuclear safety and security are both aimed at protecting people, goods, society and the environment. Safety and security measures must be devised and put in place in an integrated manner in order to create a synergy between these sectors, and in such a way that safety measures do not compromise security and security measures do not compromise safety.

**Regarding security and radioprotection,** IRE and IRE ELiT pursue the goal of minimising the exposure of both the general population and their workers to ionising radiation. In order to do this, IRE and IRE ELiT undertake to conduct their work in high-quality facilities that meet the current design and operational standards, so as to assure a high level of security based on the principle of in-depth defence, and to offer a high level of protection from ionising radiation, in both routine and accidental situations. The commitments of IRE and IRE ELiT regarding security and radioprotection are described respectively in the IRE and IRE ELiT security reports.

**Regarding conventional security,** IRE and IRE ELiT pursue the goal of improving the workplace conditions and well-being of their staff and of external workers performing activities on their behalf as far as possible. In order to do this, IRE and IRE ELiT comply with the applicable regulations regarding well-being on the workplace, enforce an ambitious risk-prevention policy and adapt this risk-prevention policy to comprehensive (five-year) prevention plans under an annual prevention plan and through a dynamic risk management system.

**Regarding nuclear security,** IRE and IRE ELiT pursue the goal of preventing, detecting and knowing how to react to any malicious act. In order to do this, IRE and IRE ELiT have put nuclear safety measures in place aimed at protecting their facilities, including nuclear material, radioactive material, nuclear facilities and activities associated with any malicious act, as well as potential impact on the general population, staff and/or the environment. In particular, these measures make it possible to dissuade any potential aggressor, quickly detect a possible attack, and slow down the progression of an attack. In line with this, IRE and IRE ELiT have put the necessary systems in place to facilitate the triggering of an appropriate response to any potential attack. Regarding response, IRE and IRE ELiT have concluded the necessary agreements, notably with the Federal Police who will be tasked with this response. Finally, IRE and IRE ELiT have put the necessary measures in place for the protection and secure exchange of sensitive information related to the above-mentioned elements of its facilities and their means of protection. The commitments of IRE and IRE ELiT regarding physical protection are outlined in the IRE Physical Protection section.

In order to achieve these objectives, IRE and IRE ELiT are putting in place **a management system** which describes, via procedures, modus operandi or instructions, the way in which facilities must be used in routine or accidental situations and the way in which actions must be conducted by IRE - IRE ELiT staff, on-site subcontractors and security teams in order to meet the objective of optimising safety and security. The procedures, modus operandi and instructions cover, among other things, all obligations regarding the maintenance and upkeep of equipment.

IRE and IRE ELiT are putting in place an appropriate staff **training and information programme** and are committed to developing and providing for a culture of optimal safety and security within the UTE. These training and information programmes, as well as the initiatives undertaken aimed at developing a culture of optimal safety and security, are also intended for external companies that could have an influence on IRE/IRE ELiT's safety or security standards.

With a view to continuing improvement, **internal and external "lessons learned" programmes** have been put in place across all levels of the company to facilitate the ongoing evaluation of its functioning in such a way as to quickly identify possibilities for improvement.

Regarding safety and security, **precise and ambitious objectives** are defined internally and monitored by the different levels of IRE - IRE ELiT management on a regular basis. These objectives may relate to a number of deviations, a number of accidents, etc.

It goes without saying that IRE and IRE ELiT respect all the applicable regulations and collaborate closely with the relevant national and international authorities.

## Environmental Policy

IRE and IRE ELiT management undertake to conduct their activities in a manner that respects the environment and thus take all necessary measures to reduce the environmental impact of the activities performed by IRE and IRE ELiT.

In order to reduce their impact on the environment, IRE and IRE ELiT take the following measures:

Regarding the emission of gaseous radioactive substances, IRE and IRE ELiT operate their facilities in such a way as to minimise the emission of radioactive substances. In order to do this, IRE and IRE ELiT aim to minimise, at the operational level, the generation of gaseous radioactive effluents at source. IRE and IRE ELiT have also put treatment and filtration facilities for gaseous radioactive effluents into operation for use in routine and/or accident situations. The functioning and efficiency of these installations are measured continuously so as to further reduce the environmental impact when gaseous radioactive substances are generated. The potential release of radioactive substance into the environment is measured continuously and recorded by IRE monitoring systems. These systems also enable the detection of any anomaly that could lead to the release of a radioactive substance into the environment.

Regarding liquid radioactive substances, IRE and IRE ELiT also aim to minimise the potential impact of liquid radioactive substances on the environment. In order to achieve this objective, IRE and IRE ELiT have put collection systems in place for liquid effluents that could be contaminated by radioactive substances. These are monitored on a regular basis. In the event of absence of radioactive contamination, these effluents can be released into the environment. If, on the other hand, radioactive contamination is detected, the effluents are left to diminish until all radioactive contaminants have been eliminated. Other regulations regarding respect of the environment (example: contamination rate of heavy metals, etc.) are also adhered to.

Regarding waste, radioactive or otherwise, IRE and IRE ELiT have developed the infrastructure and processes required for its management. The necessary staff are made available to ensure optimal waste management, and also to reduce environmental impacts related to the generation of waste. The IRE and IRE ELiT policy regarding waste management is founded on three pillars: avoiding the generation of waste, separating waste in order to facilitate its recycling, and managing/disposing of waste that had to be produced and which we are unable to recycle. These three elements apply to radioactive waste but, with regard to its elimination, the waste may need to be retained prior to disposal for a period defined by IRE and IRE ELiT processes in order to minimise the impact on the environment and on staff who treat it. Similarly, IRE and IRE ELiT undertake to respect the acceptance criteria defined by the competent authority regarding the management of radioactive waste.

Regarding environmental permits, IRE and IRE ELiT undertake to comply with the regulations in force concerning the environment as well as the conditions specified in their environmental permit.

IRE and IRE ELiT also undertake to **reduce their environmental impact** by progressively launching and continually evaluating other types of initiatives such as savings concerning energy consumption, reduction of paper use, etc.

In addition, the department that assembles radioactivity measurement laboratories has been **certified under ISO 14001** (environmental management system) since 2015 and also adapts its environmental policy (AQELiT.MQ004.ann001) to its scope of activities.

In compliance with safety and security measures, **precise and ambitious objectives have been defined and monitored** regarding respect of the environment. These objectives may relate to an emission level, compliance with radioactive waste storage conditions, etc.

