

Corporate Health & Safety Policy

1. Objectives

The daily efforts and know-how of our employees ensure the quality of our products and form the base of our success and the stability of delfortgroup. The health and safety of all our employees is thus a vital precondition for our daily operations.

This Health and Safety Policy (HS Policy) outlines delfort's ambitious intentions and direction to provide a safe, healthy, and supportive working environment and to ensure high quality standards to serve our customers and stakeholders.

The HS Policy defines principles and sets objectives related to our HS performance. It provides the framework for setting right and responsible targets, getting actions done and measuring results.

delfort aims to set high standards covering the following relevant areas:

- The way we design products
- The way we manufacture
- The way we supply and distribute.

2. Scope

This HS guideline is applicable for all OPCO's, every delfort employee, our suppliers and our visitors at delfortgroup and affiliated companies. Each OPCO is responsible to determine its specific relevant topics on top.

3. Our responsibility

3.1. General management approach and relevance

Our delfort performance bond stands beside a responsible design of our manufacturing processes we strive for environment friendly products and service solutions for sustainable economic activities and the protection of natural resources and humans.

We consider a safe and healthy workplace to be more than a social responsibility: it is an expression of respect. We also recognize the importance of advancing our employees' professional development and nurturing their motivation and productivity as this contributes directly to our business's success. At delfort, our employees work under some considerable health and safety threats, such as high temperatures, the handling of heavy loads, the use of chemicals, and the operation of machinery. That each employee returns home safely to their families is imperative. We do everything in our power to maintain zero fatalities and achieve no Lost Time Accidents (LTA) at all sites (Goal Zero).

- We comply with all legal and branch specific requirements, applicable regulations and national standards
- We integrate health and safety in our business strategy and daily processes
- We involve our employees & business partner in decisions according to our commitment on “cooperative collaboration”
- We strive for a continuous improvement of our management systems, our performance and results by setting and follow-up of our goals in all relevant areas to react and to set reasonable measures and sustainable corrective actions
- We analyze, identify and manage all health and safety risks in the field of our business activities

3.2. Our management concept for health & safety

Our Occupational Health and Safety Policy serves as an overarching, internationally valid group regulation. It follows international standards and national laws and emphasizes the managers’ obligation to act responsibly. However, it also underscores the employees’ responsibility. Therefore, we engage our workforce in the development, implementation, and execution of appropriate health & safety programs.

delfort’s safety culture is based on three pillars: our line-system, our Safety Awareness Talks, and safety assessments.

- **Line-system:** Identifying, Analyzing, Solving of safety issues → We are consistent
- **Assessments:** Controlling, evaluating and improving → We learn from each other
- **Safety Awareness Talks:** Cross-functional talks to raise our sense of awareness regarding risks & hazards We take care

Line-system Management carries the responsibility of enforcing occupational health and safety throughout our organization. Roles are clearly defined – each manager is responsible for occupational health and safety in one’s own supervisory and functional area. At all mills, we deploy dedicated work safety managers who represent workers at each site through formal joint management committees. We implemented discussion of safety observations and near misses in our Go & See meetings (shop floor management) as standard to understand occurring or potential accidents and their prevention. Every manager leads by example, sets clear tasks, and does not tolerate unsafe behavior. In the case of recurring deviations, we set consequences according to our clearly defined and communicated escalation process.

With the **assessments** we identify risks and improve our work environment and behavior based safety. Beside regular assessments in our operations done by the responsible EHS personnel and department manager the general managers of each OPCO are performing regular work safety assessments where measures are defined and progress is followed up & discussed in the result reviews with our top management.

With our **Safety Awareness Talks** we cover the dimension of individual responsibility for a save work environment. Safety awareness talks can be performed-cross functional and independent of hierarchical level. With this process we motivate all employees to take responsibility for one’s own and colleagues.

3.3. Our goals, our KPI's, our programs and our guiding principles

Work Safety as well as Maintaining and promoting the health of our employees is the top priority at delfort. We have the goal of 0 accidents and our worldwide valid Life Saving Rules (LSR) support and claim this goal. We established a groupwide health & safety program based on our Life Saving Rules facilitated by trainings for all employees including administrative areas in all affiliated companies. We follow these rules consistently and ensure that everybody is safe @ work!

We measure groupwide the following KPI's on a monthly basis as absolute and specific values:

- Safety observations/deviations Observation of unsecure conditions without an incident
- Near misses - No injuries are caused by the accident
- Accidents for
 - A0 – no absence
 - A1 – absence 1-3 days
 - A2 – absence >3 days
 - fatalities
 - commuting accidents
- Accident rate (A1+A2)/1000 FTE → goal 0
- Rate of safety awareness talks / 1000 FTE → goal 500 /1000 FTE

For analysis we distinguish if injuries are caused by technical, organizational or behavior based reasons.

Our guiding principles:

- Our goal is: 0 accidents
- We always give priority to safety at work, especially in cases of doubts.
- We do it safely. Nothing is so urgent that we can't stop, think, go.
- We lead and act by example.
- We pay attention to our own safety and the safety of those around us
- We take care of each other with courage – we say something.
- We invite our employees to contribute to a safe environment and culture @ delfort
- We value input and continuously improve our safe working environment for all employees, business partner and visitors
- We define and follow up actively our measures to eliminate incidents and emergencies and to react on effects and manage them appropriate

We steadily improve our prevention programs, supported by industry-leading methods and dedicated safety experts to prevent accidents and illness.

At delfort, we are fully committed to our Goal Zero.