

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 & 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 Health & Safety Policy is applicable for all sites, every delfort employee, workers who are not employees but whose work and/or workplace is controlled by delfort, our suppliers and our visitors at delfort and affiliated companies. Each site is responsible to determine its specific relevant topics on top.

3. Our responsibility

3.1. General management approach

Our delfort performance bond stands beside a responsible design of our manufacturing processes. We strive for conscious 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. It is imperative that each employee returns home safely to their families. 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 partners in decisions according to our commitment to "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 health & safety management approach

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

The general manager of each site is responsible for ensuring that our delfort rules (always in accordance with local laws), as well as procedures, are followed. All sites have health and safety emergency action plans in place, which are communicated to employees (including emergency evacuation procedures, first aid procedures, fire drills, provision of emergency equipment, etc.).

delfort's safety culture is based on three pillars: the line-system, safety assessments, and our Safety Awareness Talks (SAT).

- Line-system: Identify, analyze and resolve safety issues → We are consistent
- Assessments: Control, evaluate and improve → We learn from each other
- Safety Awareness Talks: Cross-functional talks to raise awareness of risks & hazards
→ We take care

Within the **line-system** our 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 his/her 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 have 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 take 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. In addition, health & safety risk assessments are carried out for each workplace, including work related stress analysis and our maintenance departments regularly execute safety inspections for all work equipment and machines. All employees (including the workers of subcontractors) receive safety instruction and are trained on health and safety risks relating to their workplace prior to starting their work at the site and later in regular intervals. This is especially valid for young workers (which have reached the minimum working age but are below 18 years) and additional actions are in place to instruct them regarding working hours and hazardous activities which may not be carried out by young workers.

Beside regular assessments in our operations done by the responsible **Environmental, Health & Safety (EHS)** personnel and department manager the general managers of each site 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 safe 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.

4. Our guiding principles

We measure and share groupwide the following KPIs monthly as absolute and specific values, and our employees are informed where to report on occupational health and safety incidents, risks and concerns:

- Safety observations/deviations Observation of unsafe conditions without an incident
- Near misses No injuries are caused by the accident
- Rate of safety awareness talks → **goal 500** per 1,000 productive employees

- Accidents
 - A0 – injury, no absence
 - A1 – absence 1-3 days
 - A2 – absence >3 days
 - Fatalities
 - Commuting accidents
- Accident rate
 - **goal 0**
 - LTI internal def. (frequency) number of (A1+A2)/1,000 productive employees
 - LTIFR (frequency) number of lost time (A1+A2) * 1,000,000 / total hours worked
 - LTISR (severity) number of days lost due to injuries * 1,000 / total hours worked

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. 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

We steadily improve our prevention programs, supported by industry-leading methods and dedicated safety experts to prevent accidents and illness. With all our groupwide initiatives (e.g., LSR Program, Zero accident campaign, Safety Awareness Talks, Work Safety Assessments by the top management, etc.) we have been able to improve our group wide safety performance.

At delfort, we are fully committed to our goal zero accidents.

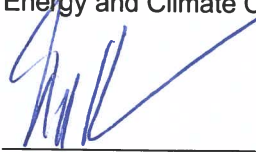
5. Implementation and Compliance

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.

Safety rules are established to prevent accidents, and it is therefore essential that our employees follow them. All delfort leaders and employees are required to adhere to our Life Saving Rules as well as any local work safety rules as an integral part of their responsibilities. Also, we foster a clear communication culture to encourage our employees to speak up, if they have concerns about the effectiveness of rule.

6. Review

This Policy will be reviewed annually by the Board of Directors and the Head of Corporate Work Safety, Energy and Climate Care, and amended as appropriate.



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