**Aliaxis Group Policy No. 6**

# Health, safety and environmental sustainability

September 2020

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# Introduction

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**Designed by:**

Global Head of Health, Safety & Environment

**Audited by:**

Group CLO und Executive Committee

**Approved by:**

Group CEO

**Revision number:**

2

**Date:**

September 2020

## RESPONSIBLE FOR THE REVIEW

Group CLO, Group COSO und CHRO

## RESPONSIBLE FOR APPROVAL

Group CEO

## SCOPE OF APPLICATION

This policy applies globally to all companies in which the Group has a majority shareholding.

Aliaxis HQ and/or any Aliaxis subsidiary are referred to in this document as the "Company". All companies collectively are referred to as the "Group".

Each Company is responsible for the implementation of this Policy in accordance with applicable local law and within the scope of its independence under company law.

## Content

1. scope and purpose of this directive
2. general principles
3. organization and implementation
4. updates and references

## Attachments:

A. Commitment to health and safety
B. Commitment to environmental sustainabilityv

# 1
## Scope and purpose

### 1.1 Scope of application

This policy applies to all Group companies worldwide. Responsibility for implementation rests with our **Country Heads** (the individuals legally responsible for day-to-day management) and with our **Site Leaders**.

The Policy should be read in conjunction with **ISO 45001**, **ISO 14001** and our **global standards for health, safety and the environment**, available on the Group intranet can be read.

### 1.2 Purpose

Zweck dieser Richtlinie ist es, unser **Commitment to** Care zu erweitern, unsere Ambitionen und Ziele für Gesundheit, Sicherheit und ökologische Nachhaltigkeit (im Folgenden HSE) zu definieren und unseren Ansatz zur Erreichung dieser Ziele darzulegen.

# 2
## General principles

### 2.1 "Go for Zero" principles

Our approach to HSE is based on the following general principles:

- **Legal compliance** is a minimum requirement;
- Acting responsibly is the only way to be **financially successful** in the long run;
- Meeting the needs of the present must not prevent **future generations** from meeting their needs;
- HSE is the responsibility of **line management**, and HSE results are an indicator of leadership;
  Excellence in HSE requires a **proactive and collaborative** approach;
- Robust management of risks and impacts requires a **management systems approach**;
- Companies can positively influence HSE beyond their own operations in their **value chain**;
- One incident is one too many - **we follow "Go for Zero" principles.**

# 3
# Organization and implementation

## 3.1 Organization

### All employees

All employees, regardless of their position, are responsible for taking care of themselves, others who may be affected by their work, and the environment. In particular, they should:

- Learn and apply relevant HSE standards;
- Identify and eliminate HSE risks and their impacts;
- Plan their work so that it is safe and easy;
- Share information about and experiences with HSE with others;
- Develop your own HSE knowledge and skills.

### Team Leader

Team leaders are responsible for ensuring that the work performed by their team is done in a way that minimizes HSE risks and their impact. In particular, they should:

- Promote continuous improvement of HSE;
- Ensure capability and accountability for HSE within their team;
- Develop and empower the team (to identify and manage HSE risks);
- Analyze HSE incidents for learning;
- Be a role model (in terms of HSE-related behaviors).

### Department Manager

Department managers are responsible for ensuring the effective implementation of the local HSE management system. In particular, they should:

- Coordinate the assessment of HSE risks and their impacts;
- Develop and execute HSE improvement plans;
- Monitor HSE compliance and performance;
- Celebrate HSE Successe

### Executives

Country Heads and Site Leaders have overall responsibility for HSE in their companies and sites and are responsible for ensuring that an effective HSE management system is in place and being applied. In particular, they should:

- Explain the value and define the vision for HSE;
- Prioritize risks and impacts and develop an HSE strategy;
- Integrate HSE into business processes;
- Assign responsibilities and resources for HSE.

Aliaxis employees with supervisory or managerial responsibilities fall into more than one of the above groups In such cases, all relevant responsibilities apply.

# 3
# Organization and implementation

## 3.1 Organization (continued)

### HSE Leaders

The Group maintains a global HSE function whose mission is to **promote and strengthen excellence in HSE**. It supports the Group and its companies in HSE management by providing expertise, training and coaching. It operates as a global function and facilitates the exchange of information between different companies.

The HSE function reports to the **Global Head of HSE**, whose main responsibilities are:

- Monitor and analyze the Group's HSE risk profile and performance, and advise managers on HSE strategy and implementation;
- Develop an HSE management system with standards, guidance, tools, training, etc;
- ensure effective communication on HSE both within the Group and with external stakeholders;
- continuously improve the capabilities of the HSE function.

## 3.2 Implementation

**HSE management systems** implemented at the corporate and site levels should be aligned with the requirements of ISO 45001 and ISO 14001 and ensure compliance with Aliaxis' global HSE standards. They should be based on a Plan-Do-Check-Act cycle that includes a three-year plan and appropriate feedback mechanisms, including:

- HSE parameters that provide information on strengths and weaknesses;
- local internal HSE audits;
- analyses of HSE incidents.

**Governance** for HSE should be integrated into corporate and Group governance processes. In addition, cross-functional HSE councils should be established at the corporate, departmental and group levels by the respective corporate management, department head and Aliaxis Group CEO, respectively. They should meet regularly to:

- Agree policies, strategies and plans;
- Assign responsibilities and allocate resources;
- monitor performance and remove obstacles;
- Conduct an annual review of HSE management.

Companies are expected to share information about successes and incidents within the group to help others learn and accelerate their path to improvement. Good performance should be recognized and celebrated at every level of the group.

# 4
# Updates, references and definitions

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## 4.1 Updates

This document updates and integrates the two previous guidelines: Health and Safety (2011) and Environment (2012).  The main changes in content are summarized below:

**Health and safety**
- Explicit mention of mental well-being;
- New commitment to helping our employees live safer and healthier lives;

**Environment**
- Explicit mention of reuse and recycling of plastics;
- New commitment to practice a non-polluting and resource depletion approach within the value chain;

**General**
- Implement a management system approach aligned with ISO 45001 and 14001;
- Reference to Aliaxis' global HSE standards;
- Addition of the signature of the Aliaxis Group CEO;
- Updated descriptions of organization and implementation.

## 4.2 Referenzen

Aliaxis - purpose, mission and values

Aliaxis - global HSE standards

ISO 45001: 2018 Occupational safety and health management systems -Requirements with guidance for use.

ISO 14001: 2015 environmental management systems -requirements with guidance for application

## 4.3 Important definitions

**Team Leader**              A person with supervisory responsibilities to whom other employees report.

**Department Manager** A person responsible for the activities of a department or function (at a single site or across multiple sites).

**Executive**              A person involved in the management and control of an Aliaxis site or company or the Aliaxis Group.

**Feasible**              A risk control measure is considered feasible if:

- it involves the application of an available technology; and
- the risk reduction achieved is commensurate with the resources required to implement it.

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# Appendix A:
## Our commitment to health and safety

### How do we commit ...

Promote the physical and mental well-being of our workforce and prevent work-related injuries and illnesses.  This commitment extends not only to our employees, but also to contractors, visitors and others affected by our activities.

### We will ...

- Comply with relevant legal requirements;
- Manage health and safety risks by applying the most reliable controls possible;
- Enable employees (and their representatives) to participate in health and safety management;
- Help our employees lead safer and healthier lives;
- Communicate our approach and performance to our stakeholders.

### We achieve these goals by ...

- Prioritize our efforts based on risk assessments of our overall operations;

- Integrate health and safety into decision-making (including workplace design);

- Promote a proactive culture of continuous improvement;

- Analyze incidents to understand root causes and prevent recurrence;

- Take targeted health actions that focus on key population risk factors; and Support individual employees in addressing work-related health issues.

### To enable these efforts, we will ...

- Implement and continuously improve a management system in accordance with ISO 45001, including global HSE standards based on industry best practice;
- Develop the skills of our employees and ensure accountability for behaviors;
- Maintain a network of health and safety leaders to support the realization of this policy.

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Koen Sticker

Deputy CEO Aliaxis

# Appendix B:
## Unser Engagement für ökologische Nachhaltigkeit

## How do we commit ...

Deliver products and services that bring social benefits, in line with the concept of environmental sustainability.

## We will ...

- comply with relevant legal requirements;
- design and operate our value chain in a way that minimizes pollution and resource depletion;
- Promote the reuse and recycling of plastics to keep them in the economy and out of the environment;
- communicate our approach and performance to our stakeholders.

## We achieve these goals by ...

- Prioritize our efforts based on life cycle assessments of our entire value chain;
- Integrate environmental considerations into decision-making (including resource sourcing and product and manufacturing process design);
- Promote a proactive culture of continuous improvement;
- Prevent, minimize and manage solid, liquid and gaseous waste to prevent environmental damage;
- Analyze incidents to understand root causes and act accordingly to prevent recurrence.

## To enable these efforts, we will ...

- Implement and continuously improve an ISO 14001 management system, including Group-wide environmental standards based on industry best practice;

- Develop the skills of our employees and ensure accountability for behaviors;

- Maintain a network of environmental leaders to support the realization of this policy.

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Koen Sticker
Deputy CEO Aliaxis