



GRÄNGES

Environmental, Health & Safety (EHS) Policy

GP07

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1 INTRODUCTION

Providing a safe work environment is a top priority as Gränges strives towards operating an injury-free workplace. Efficient management of energy and materials is also critical to Gränges as it improves the company's profitability, competitiveness, and environmental performance.

1.1 Purpose

The aim of this policy is to describe Gränges' efforts and expectations to ensure a safe workplace and to run its operations with minimal environmental impacts.

1.2 Scope

This EHS Policy applies to all Gränges employees and individuals who are directly or indirectly related to its operations. It includes temporary staff, e.g. independent contractors, consultants who work onsite or offsite on behalf of Gränges.

This EHS Policy provides an overview of Gränges' EHS principles and explains the basic requirements that Gränges' employees and other individuals who are covered by this policy shall follow. In cases where there is a difference between the EHS Policy and local requirements and guidelines, whenever legally possible, the stricter requirements shall be applied.

Gränges' EHS policy is aligned with and serves as the foundation to the company's sustainability agenda as well as Gränges Code of Conduct.

Each individual is responsible for reading, understanding, and comply with the expected behaviour as outlined in this EHS Policy!

1.3 Contacts

If you need advice, primarily contact your manager or the local production manager. You may also contact the SVP Process Engineering & Operational Development.

1.4 Links to other policies

- Global Code of Conduct, see [link](#):
- Global Alcohol and drug Policy, see [link](#).
- Local work environment or safety policies and guidelines.

2 DEFINITIONS

For the purpose of Gränges' EHS Policy, the following definitions are to be used.

KEY TERM	DEFINITION
5S standard	<p>5S engages people through the use of 'Standards' and 'Discipline'. It is not just about housekeeping, but concentrating on maintaining the standards & discipline to manage the organization - all achieved by upholding & showing respect for the Gemba [workplace] every day.</p> <p>The 5 Steps are as follows:</p> <ul style="list-style-type: none"> • Sort: Sort out and separate what is needed & not needed in the area. • Straighten: Arrange items that are needed so that they are ready & easy to use. Clearly identify locations for all items so that anyone can find them & return them once the task is completed. • Shine: Clean the workplace & equipment on a regular basis in order to maintain standards & identify defects. • Standardize: Revisit the first three of the 5S on a frequent basis and confirm the condition of the Gemba using standard procedures. • Sustain: Keep to the rules to maintain the standard & continue to improve every day.
Contracted worker	Individuals working onsite or offsite on behalf of Gränges.
First aid case (FAC)	Minor work-related injuries or occupational illnesses that are <u>not</u> classified as recordable accidents.
Injury free event (IFE)	An incident that does not result in an injury, illness or environment non-compliance but under slightly different circumstances could have.
IFE per FTE	Number of IFEs per full time equivalent.
Lost workday injury	An injury resulting in one or more calendar days (following the day an injury or illness occurs) that an employee cannot work due to the work-related injury or illness.
Lost workdays (LWD)	The sum of workdays accumulated by employees being absent from work due to a Lost workday injury.
Medical treatment case (MTC)	An incident requiring medical treatment.
Medical treatment	Any treatment above or beyond first aid. Treatment is administered by a physician or a registered professional under the standing orders of a physician. This does not include first aid treatment even if provided by a physician or registered professional.
Restricted work case (RWC)	<p>A case when management prevents, or a physician or other licensed healthcare professional recommends, an employee to not perform one or more routine functions of a normally assigned job, or not work the full shift, due to a work-related injury or illness.</p> <p>A restricted work case is not recorded as a restricted work case if an employee experiences minor musculoskeletal discomfort, and a physician or other licensed healthcare professional determines the employee is fully able to perform all routine job functions, but the</p>

	employer assigns a work restriction to the employee to prevent the development of a more serious condition.
Serious injury	An irreversible injury such as an amputated finger or lost eyesight, or a reversible injury causing prolonged periods of pain or suffering for the employee, or an accident with an absence longer than 15 days.
Severity Rate	Total number of Lost workdays per million hours worked.
Recordable accident case	A case which is either a Medical treatment case, a Restricted work case or a Lost workday case.
Total Recordable Rate (TRR)	Total number of Recordable accident cases (MTC + RWC + LWC) per million hours worked.

3 GENERAL PRINCIPLES

- Always comply with legal requirements. If any non-compliance exists, make sure an action plan is developed to eliminate the non-compliance.
- Strive towards an injury-free and resource-efficient workplace by following the principles outlined in this policy.

3.1 Management systems

- Gränges deploys its EHS Policy by means of EHS Management Systems, which are based on hazard identification and risk assessment and control. Gränges' target is that:
 - All sites have an occupational health and safety (OHS) management system in accordance with OHSAS 18001 or ISO 45 000. The general principles of the ILO Occupational Safety and Health Convention, 1981 (No. 155) are the basis for such a management system.
 - All sites operate management systems in accordance with ISO 14001 (environmental management) as well as ISO 50001 (energy management).

4 WORKPLACE SAFETY PRINCIPLES

In all its activities to generate products and services, Gränges attempts to continuously improve the working environment as well as the health and safety awareness and behaviour. Gränges strives towards an injury-free workplace that protects the health and fosters the wellbeing of employees and all persons directly or indirectly related to its operations. No individual should be at risk of injury in a Gränges workplace.

4.1 Hazard identification and risk assessment

- Actively deploy at least the following "critical 5" hazard categories, which have top priority.
 - Machine guarding, lockout and tagout – verify (LOTOV), i.e. ensuring machinery is fully switched off and de-energized before maintenance work begins
 - Mobile equipment

- Fall protection
 - Confined spaces
 - Molten metal
- Deploy hazard analysis, risk assessment and risk control measures for routine and non-routine tasks, by means of Job-safety-analysis (JSA) of routine activities and work permits for maintenance work performed by own employees and contractors. Accident and incident statistics and analysis may be used for hazard and risk analysis.
- Drive a structured location-based employee engagement programme with measurable and relevant leading indicators. This includes to implement a Walk-Observe-Communicate programme whereby employees observe activities and discuss risk behaviour and improvements.
- Ensure a clean, tidy and safe work environment organized by the principles of 5S with the objective to proactively and quickly identify and remove safety hazards and foster safe behaviour.
- While at work or when conducting business for Gränges, all employees and contracted workers must be able to function with unimpaired judgement. This means refraining from intoxicating substances and/or alcohol.

4.2 Safety reporting

- Report Injury Free Events (IFE) and unsafe conditions
- Register and classify all accidents and incidents, both with actual and potential consequences:
 - Actual consequence: First-Aid Case (FAC), Medical Treatment Case (MTC), Restricted Work Case (RWC), Lost Workday (LWD).
 - Potential consequence: Light - Medium - Severe depending on the potential seriousness of the accident.
- Perform investigation for recordable cases or IFEs and FACs with severe potential consequences. Investigation should contain conducting a root-cause analysis and identifying corrective and preventive actions. A review of effectiveness should be done within 3 months to close the case.
- Define location-specific indicators and targets as part of the business planning cycle and report actual results monthly. Minimum requirements are:
 - Lagging indicators: Total Recordable Rate, Severity Rate
 - Leading indicators: IFE per FTE, engagement programme indicator.

4.3 Safety training

- Actively improve health and safety awareness and skills by providing regular health checks as well as training in the “critical 5” hazard categories (re. 3.2), machine safety, personal protective equipment, fire safety, first aid, and emergency response.
- Carry out comprehensive safety training for all employees, temporary staff and managers at least once a year. New employees should always be trained before they start their jobs.

- Provide specific safety training for production employees, including particular aspects such as hand and finger injury prevention.

5 OCCUPATIONAL HEALTH PRINCIPLES

- Include occupational health hazards in the hazard identification and risk assessment and control programmes (re. workplace safety expectations).
- Apply a location-based noise control programme.
- Apply a location-based ergonomics improvement programme.

6 ENVIRONMENTAL PRINCIPLES

Gränges continuously improves its activities and processes to reduce the environmental footprint and the consumption of natural resources. The continuous improvement of process efficiencies and metal yield will lead to reductions in specific water and energy consumption as well as process media. Through its re-melting activities, Gränges aims to limit the use of primary aluminium and alloying elements as much as possible. This is made possible by the recycling and efficient re-melting of the internal process scrap, as well as externally purchased scrap.

Gränges develops, produces and sells products that enable its customers and the end users to design, produce and use products with reduced environmental impact. Gränges thereby actively aims to contribute to a resource efficient and sustainable circular economy.

6.1 Hazard identification and risk assessment

- Take a precautionary approach to environmental risks.
- Report environmental risk observations in site-specific incident management systems.
- Raise key risks to the regional management team implement mitigation activities.
- Integrate measures to mitigate environmental risks into investment and maintenance routines.
- Drive a structured location-based employee engagement programme with measurable and relevant leading indicators.

6.2 Environmental reporting

- Define location specific indicators targets to limit the use of natural resources and/or to reduce waste and emissions, in line with and to support the location based sustainability targets. Such reporting should be part of the business planning cycle and actual results are to be reported at least yearly.
- Report at least the following indicators:
 - Metal consumption volumes: primary metal, alloying elements, aluminium slabs and re-roll inputs, external scrap inputs, scrap sales, dross sales.
 - Energy consumption: electricity, district heating, natural gas, propane, diesel, petrol.
 - Purchased electricity mix by source.

- Emissions to air, water and soil.
- Water: water withdrawal by source, water usage by purpose (process, cooling, domestic), water discharge by destination and quality, water consumption, water risk.
- Such targets should aim to:
 - Reduce energy and water consumption; hazardous waste; general material waste (wood, paper, oil, plastic...) where applicable; emissions to air, water, particulate matter where applicable; dross; input of primary metal and alloying elements.
 - Increase recycling rates for both internal and external recycled aluminium; metal yields.

6.3 Environmental training

- Carry out regular environmental training for all employees, temporary staff and managers to improve environmental awareness and skills. New employees should always be trained before they start their jobs.
- Provide specific environmental training for production employees, including aspects such as metal management, energy, waste, water etc.

7 REVIEW OF THE EHS MANAGEMENT SYSTEM

- Organize a location-based self-audit program to review the effectiveness of the EHS Management System.
- Conduct, at least annually, a formal and documented location-based management review, based on the outcome of the self-audit program.
- Participate in and conduct location-based “cross-audits”, in line with the Gränges’ cross-audit plan. The objective of this cross-audit is to review the performance of at least the “critical 5” hazard categories as well as the environmental impacts and fire safety programs. Participants from other locations will participate in such cross-audits in order to share best practices.
- Report the outcome of the respective audits during the annual Group Management review in December (done by the regional President).

8 DEVIATIONS

Any deviation or exemption from this EHS Policy must be approved or resolved in advance by Gränges’ SVP Process Engineering & Operational Development.

9 REVIEW

The EHS Policy is revised regularly by the SVP Process Engineering & Operational Development and approved by the CEO.

10 REVISION HISTORY

This EHS Policy has been revised in April 2020. Main changes include:

- A general update of the policy outline and content. This includes adding section 2 on Definitions as well as clarifying sub-chapters 3 General principles; 4 Workplace safety principles; 5 Occupational health principles; 6 Environmental principles.
- Adding more details about environmental hazard identification and risk assessment, as well as environmental reporting and training.