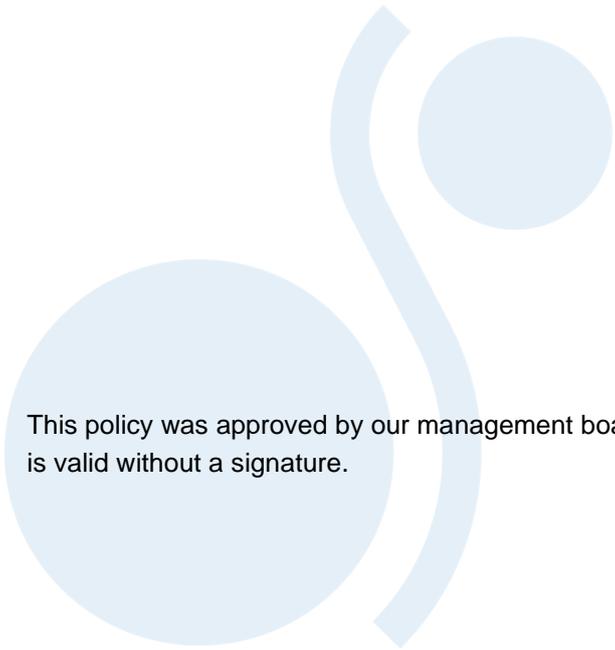


H&S Policy

Schur Flexibles Group

Date: 01/02/2020
Status: effective by 01/02/2020



This policy was approved by our management board on 01/02/2020. This document has been created digitally and is valid without a signature.

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Purpose, Scope and Exclusion

This document defines the frame for the Schur Flexible Health & Safety management system and applies to all operation units and legal entities within the Schur Flexibles Group. The Health & Safety management system supports the efforts and enables the organisation to ensure a safe and reliable operation. The content of this document may differ from or go beyond what is legally required and the reader might consider to be good or best practice. It does not affect the obligation to comply with applicable legal and regulatory requirements. Internal standards apply only if they do not conflict with applicable legal and regulatory requirements. If any apparent conflict with applicable legal and regulatory requirements is identified, a reader should seek advice from Schur Flexibles Group Health & Safety. Readers are reminded to check that any paper or other version of this document is current. The English language version of this document is the original and has primacy over any translation into another language in the event of any conflict or inconsistency.

Summary

This document sets the frame for the Schur Flexible Health & Safety management system and outlining the operating principles and key requirements of the Health & Safety management system. Each section mentioned in this document is supported by a set of internal standards providing guidance and more detailed information on a specific Health & Safety subject.



1. Policy

1.1. Objectives

The Health & Safety Charter and Health & Safety Policy of the Schur Flexibles Group guides the organisation over the long term, bringing benefits to both the Schur Flexibles workforce and owners; assuring the success of our strategy.

Schur Flexibles defines the following objectives in terms of Health and Safety:

- Compliance with the local laws & regulations and to go beyond with our Health & Safety / Risk management system and internal standards from what is legally required.
- Developing and maintaining a Health & Safety / Risk management system and internal standards to enable a work environment with no work related injuries or occupational illnesses and no operational accidents harming our workforce and neighbouring communities/operation.
- On our Health & Safety journey we want to develop a culture where Health & Safety is at the core of our operations reaching an interdependent autonomous Health & Safety culture.

This document constitutes the frame for the Health & Safety / Risk management system of the Schur Flexibles Group. All leaders as well as Health & Safety professionals are trained in the Health & Safety Charter and this Health & Safety policy. Leaders from all levels are role models in terms of our Safety culture and ensuring a safe and reliable operations on a day to day basis.

Employees, temporary workers and contractors are made aware of relevant Health & Safety risks for their work activity and barriers in place to prevent and mitigate incidents.

The Health & Safety Management system takes into account:

- setting of objectives.
- international management standards in particular: OHSAS 18001 and ISO 45001.
- Best practices from industries within or outside of the packaging industry.

1.2. Health & Safety Operations Model

The operations model is outlining the core responsibilities of each level of the Schur Flexibles Group ensuring proper focus and application of resources in order to operate an Health & Safety management system.

Schur Flexibles Group Responsibilities:

- Providing: Expectations, Requirements, Definitions, Guidelines, Support, IT Systems & Platforms
- Facilitate organizational learning
- Evaluating Schur Flexibles Group wide standards and performance
- Providing Feedback

Schur Flexibles entity level Responsibilities:

- Ensure legal compliance

- Implement internal standards, requirements & practices
- Evaluate local Health & Safety Management status and align local operations to internal standards, requirements & practices
- Participate and input to organizational learning
- Providing feedback

The systematic interaction between different levels and parts of the Schur Flexibles Group are ensured by implementing and maintaining a dedicated Health & Safety Organisation.

1.3. Health & Safety Management system requirements

1.3.1. General Principles

The Health & Safety management system approach in this document is based on the concept of Plan-Do-Check-Act (PDCA).

The PDCA concept is an iterative process to achieve continual improvement. It can be applied to any management system and to each of its individual elements.

The elements in detail:

- Plan: Determine and assess Health & Safety risks and opportunities. Establish Health & Safety objectives and processes necessary to deliver results in accordance with the organization's Health & Safety Charter.
- Do: Implement the processes as planned.
- Check: Monitor and measure activities and processes with regard to the Health & Safety Charter and objectives. Ensure that results are reported to defined range of stakeholders.
- Act: Take actions to continually improve the Health & Safety performance to achieve the intended outcomes and gradually reduce risk to appropriate level.

1.3.2. Health & Safety Charter

The Schur Flexibles Group management defines and develops its Charter, objectives and commitment to Health and Safety. The Health & Safety Charter is the foundation of this policy and held in a separate document. Local entity management ensures that this Charter is in compliance with local legal requirements, communicated to entities workforce, the Charter is understood by the SF workforce and the principles applied to the operation.

The Health & Safety Charter:

- Includes a commitment to no work related injuries or occupational illnesses and no operational accidents.
- Includes principles describing the supportive factor enabling to reach the set objectives.
- Is communicated to all members of the Workforce outlining their participation and responsibilities.
- Is implemented at all levels of the Schur Flexibles Group.
- Is frequently reviewed by Schur Flexibles Group management to ensure the Charter is covering all Health & Safety risks of the operation.
- Is made available to all stakeholders.

The Charter describes management principles, involvement and overall intentions regarding Health & Safety performance. Furthermore it details the commitment of the Schur Flexibles Group management to Health & Safety and provides the general direction to the local entity management to reach established objectives.

1.3.3. Legal & Internal Requirements

The management of all levels ensure that all applicable legal and internal requirements are identified and that operation is compliant. The Health & Safety / Risk management may differ from or go beyond what is legally required. Internal requirements apply only if they do not conflict with applicable legal and regulatory requirements. If any apparent conflict with applicable legal and regulatory requirements is identified, the local entity management should seek advice from Schur Flexibles Group Health & Safety.

The local entity management is accountable to communicate relevant information on legal and internal requirements to the SF workforce.

Every local entity has a system in place to ensure its regulatory conformity and to be aware of any new modifications to existing applicable regulation to remain regulatory compliant.

1.3.4. Risk management

Schur Flexibles Group and its legal entities are identifying, assessing and managing Risks emerging from its operation.

Schur Flexibles Group and local entity management is allocating resources (People, CAPEX) to assess and manage identified risks. The Risk management process is guided by Schur Flexibles Group Risk manager and Group Health & Safety manager supported by the Health & Safety Organisation.

The Risk management process takes into consideration a wide range of risks including but not limited to Process Safety and Occupational Health & Safety risks. A bottom-up feed annual Risk review process ensures proper tracking of Risk and its long term development and management. The accountability of the Risk management and review activities is held by the local entity management. Workforce exposed to identified risks will be informed and trained on mitigation measures in place by the Health & Safety Organisation. The outcome of the Risk assessment and review is driving the Schur Flexibles Group and local entities internal standards, processes and procedures.

1.3.5. Health & Safety Organisation (Resources, Roles, Responsibilities, Accountabilities and Authority)

Roles, responsibilities, accountability, authority and relationships are defined, documented and communicated to the workforce by the Group Health & Safety manager. The Schur Flexibles Group management ensures that the local entity management provides adequate resources to operate the Health & Safety / Risk management system and achievement of targeted objectives. Those resources include human, financial and technological resources as well as organizational facilities.

A site safety team is appointed by the local entity management to ensure the implementation of the Health & Safety management system and its internal standards. The site safety team evaluates if the local operation is aligned with the Health & Safety management system and internal standards. Health & Safety (Cluster) Managers appointed by Group Health & Safety manager supporting and guiding local safety teams in order to ensure that operations is aligned to internal standards as well as safe and reliable.

Schur Flexibles Group management representatives provide feedback on the performance of the Health & Safety management system to the local entity management.

The local entity management is accountable to appoint a person for each action of Health & Safety related action plans and providing required resources to enable the action owner closing the assigned action. The action owners responsibility is to close the action on time and communicating any issues to the responsible line manager.

Schur Flexibles Group and local entity management demonstrating its commitment by making safety a priority in their decision making and acting as a role model in terms of safe behaviour.

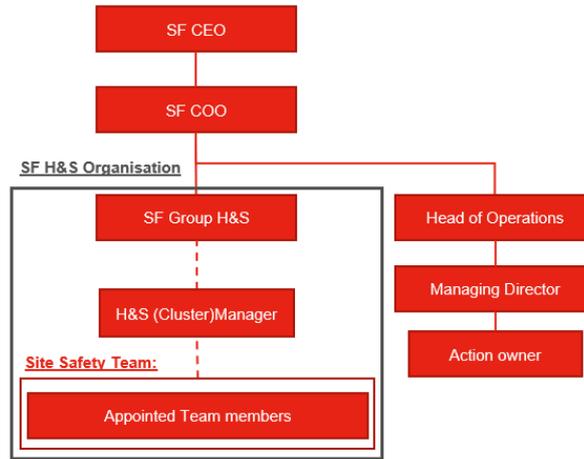


Figure 1: Principle of H&S Organisation

1.3.6. Competency and Training

The Health & Safety / Risk training develops employees, temporary workers and contractors involvement, understanding, respect of rules and self-assessment capabilities in Health & Safety fields. Efforts described supporting the development of an generative Health & Safety culture.

Competency

The local entity management defines the general and specific skills required for each function/role. The Group Health & Safety manager will issue minimum training requirements regarding Health & Safety / Risk subjects.

Group Health & Safety manager as well as the local entity H&S Manager and site safety team will observe and assess workforce behaviours and will support management & leadership of all levels to make positive changes in safety behaviour.

Health & Safety / Risk Training

Based on the Risk assessment, barriers are identified which leads to the definition of internal standards by Group Health & Safety manager. The internal standards in place will lead to training requirements for all members of the SF workforce.

The SF workforce training takes into account the different levels of responsibility, competency, understanding and the level of risk.

All new members of the SF workforce and visitors receive inductions, welcoming or orientation training, according to the job or task they perform in the organisation.

Refresher Trainings are also organized for people coming back after prolonged absence from work. The comprehension of the training is assessed by an appropriate method. For each training, a period of validity is

defined to sustain the required level of competency and its respect is followed and monitored. Retraining sessions are organized as necessary.

Health & Safety Trainings are monitored by the local site safety team and Health & Safety manager in a joint effort and permanent records are kept at local site level in accordance with local data privacy legislation. The local entity management is accountable that training according to the requirements described in the internal standards in place is delivered by member of the site safety team or Health & Safety manager. The Group Health & Safety manager is accountable that the Health & Safety manager is provided training to understand the training requirements.

1.3.7. Communication and workforce participation

Communication

The local entity management is accountable for the content, distribution and flow of Health & Safety information to the workforce, visitors and other external stakeholder. Any information containing Health & Safety or Risk insight or safety performance information issued to external stakeholder require Group Health & Safety manager approval.

The SF workforce is frequently informed and updated about Health & Safety objectives, Key Performance Indicators at the site level and continual improvement activities by local entity management.

The local entity management is accountable informing the workforce and visitors about Health & Safety risks, linked to their activities. It also communicates the measurements to mitigate risks as well as the applicable legal requirements.

All Health & Safety documents and data intended for operational use are reliable, available, accessible and understandable by everyone.

Communication is organised to spread and sustain Health & Safety culture at all Schur Flexibles Group levels. The site evaluate the efficiency of its communication to ensure understanding of the messages.

Participation

The participation of the SF workforce is essential for the continual improvement of the Health & Safety management system.

Measures are taken to gradually involve the workforce in all Health & Safety internal standards, platform, initiatives and tools, including but not limited to:

- during Risk assessment and determination of barriers;
- during investigation and analysis of incidents;
- during Audits;
- in advance of any changes in their working environment or if new or unfamiliar hazards are identified.

All member of the workforce are expected to integrate the Safety culture into their daily work activities and being role models for others.

Within the continual improvement process, proposals and initiatives raised by the workforce are taken into account and are promoted. The local entity management analyses the inputs and systematically informs the workforce about the outcome of those suggestions. Where possible, the workforce is involved in the implementation of selected suggestions and involved solving Health & Safety issues at their workplace. As a minimum, the workforce participate in the drafting and revising of new internal standards and procedures.

1.3.8. Performance, Metrics and Reporting

Schur Flexibles Group put in place a reporting process to ensure high quality gathering and documentation of Health & Safety related data. The process defines responsibilities, measurement methods, data consolidation and verification processes. Key performance indicators are based on the operational risk assessment, the internal standards in place, Health & Safety Charter and the Health & Safety objectives. The Schur Flexibles Group determines its Key Performance Indicators (KPI) to actively measure the Health & Safety performance at Schur Flexibles Group and local entity level.

Indicators are put in place allowing the assessment of the Health & Safety management system and related actions regarding continuous improvement. Furthermore indicators are put in place to follow organizational, behavioural and judgmental aspects to assess the progress towards a generative Health & Safety culture.

Key performance Indicators are reviewed by local entity and Schur Flexibles Group management, regularly communicated and displayed to the SF workforce by the Health & Safety Organisation.

Performance measuring allows Schur Flexible Group and its local entities to assess if operation is safe and reliable, the Health & Safety Charter is well-implemented and if defined targets are met.

1.3.9. Audits

Risk as well as Health & Safety audits are carried out to assess the Health & Safety / Risk management system of the local entity. Audits are pre-arranged, planned, documented and performed by trained auditors. The auditors are selected by Schur Flexible Group subject matter experts to ensure the audit is objective and impartial. Experts from peer plants can be announced to the auditor team to widen and deepen understanding of the Health & Safety / Risk requirements throughout the organisation. Auditors are independent from the local operation where the audit is held.

An audit report is developed for the local entity management which contains finding, recommendations and improvement actions to align local operations to internal standards.

The findings and corrective actions are communicated to appropriate stakeholders. Actions owner must be capable and competent to implement the action and closing it on time. The local management is accountable and responsible allocating the right resources for closing the action. A follow-up of the audit is carried out to verify that the actions have been carried out.

Every year an audit program is set up by Group Risk manager to assess the Health & Safety / Risk management system at local entity level. The audit scope will be defined and information shared with local entity management in advance of the audit by Group Risk manager. It is taking into account the Risk assessment and previous audits as well. The audit focuses on significant Health, Safety and Process safety risks as well as incidents which took place on the respective site and checks that risks are properly managed.

1.3.10. Health & Safety Management, Risk Management Review

The Health & Safety / Risk management system along with its performance indicators are reviewed in a bottom-up process at an annual frequency lead by Group Health & Safety and Group Risk management. Group Health & Safety and Group Risk management are defining the Process minimum requirements, providing guidance and training to relevant stakeholders. The Review process is starting at local site level and facilitated by local entity management performing the review according to the internal standard. The local outcome is reviewed and revised if necessary by Group Head of Operations. All entity reviews are summarized in a Schur Flexibles Group Review report which is presented to the management board by Group Health & Safety and Group Risk management. The agreed outcome is communicated to the Workforce ensuring a development and evolvement of the risk & safety awareness.

The Health & Safety / Risk management review ensures that relevant risks are identified and mitigation measures are put in place. It assures that the organisation is continuously improving its occupational and process safety. Furthermore the review is an opportunity to assess improvement and identify any significant issues.

Management reviews are conducted in a planned and structured manner and records are kept on Schur Flexibles Group IT system.



2. Definitions

2.1. Business Travel

Any travel undertaken for the purposes of work activities pursuant to the Employee's contract of employment with Schur Flexibles Group or one of its subsidiary companies.

2.2. Contractor Vehicle

Any Vehicle used by a SF Contractor to carry out their duties for SF.

2.3. Contractor

An individual who is under a contractual relationship to supply Schur Flexibles or one of its subsidiary companies with goods and/ or services. A contractual relationship covers:

- All individuals contracted directly or sub-contracted.
- All employees of companies contracted directly or subcontracted.

This applies to all levels including subcontracted relationships.

Note: For the purposes of Health & Safety reporting any sub-contractor is treated as if they held a contract directly with Schur Flexibles or one of its subsidiary companies. See also D2D Supervised Contractor.

2.4. D2D Supervised Contractor

For injury and illness recordkeeping purposes a Day to Day ('D2D') Supervised Contractor is a SF Contractor individual who is not on the SF payroll but whom SF supervises on a day-today basis.

2.5. Employee

An individual who has a current contract of employment with Schur Flexibles Group or one of its subsidiary companies.

2.6. Explosion

A release of energy that causes a pressure discontinuity or blast wave.

2.7. Fatality

Any death of a SF Employee as a result of an Incident within the SF Work-Related Boundary. Any death of a SF Contractor, as a result of a Work-Related incident at an asset or location within the SF Operational Boundary.

2.8. Fire

Any combustion, regardless of the presence of flame. This includes smouldering, charring, smoking, singeing, carbonizing, or the evidence that any of these have occurred.

2.9. First Aid

First aid case occurs when the treatment of the resultant Injury or Illness is limited to one or more of the 14 specific treatments below:

1. Using a non-prescription medication at non-prescription strength.
2. Administering tetanus immunizations.
3. Cleaning, flushing or soaking wounds on the surface of the skin.
4. Using wound coverings such as bandages, gauze pads, etc.; or using butterfly bandages.

5. Using hot or cold therapy.
6. Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc.
7. Using temporary immobilization devices while transporting as accident victim.
8. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister.
9. Using eye patches.
10. Removing foreign bodies from the eye using only irrigation or a cotton swab.
11. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means.
12. Using finger guards.
13. Using massages.
14. Drinking fluids for relief of heat stress.

2.10. Hospital admission

Formal acceptance by a hospital or other inpatient health care facility of a patient who is to be provided with room, board, and medical service in an area of the hospital or facility where patients generally reside at least overnight.

2.11. Hours Worked

Total hours worked within a Reporting Unit by SF Employee and D2D supervised contractors. Includes hours worked by Contractors working within the unit for more than one month.

2.12. Incident

An unplanned event or chain of events that affects, or has the potential to affect, the health, safety of people and / or assets.

Incidents include:

- Incidents with consequence
- Incidents without consequence (Near Miss).

2.13. Incident with Consequences

An Incident that affects the health, safety and/ or security of people or assets. Incident with consequence is also known as an accident.

2.14. Incident without Consequences

An Incident that did not, but had the potential to, affect the Health & Safety of people or assets. Incident without consequence is also known as a near miss.

2.15. Incident Investigation

Process to determine the facts that explain what happened, and how and why an Incident occurred and, when applicable, to make recommendations to reduce the likelihood of recurrence and enhance risk management.

2.16. Kilometres Driven

Total Work-Related kilometres travelled by BP Operated or Contractor Vehicles. This includes all work-related kilometres driven in hire/ rental vehicles, or private vehicles, but exclude self-propelled mobile plant or equipment.

2.17. Lost time Injury (LTI)

A lost time injury (LTI) is an injury sustained during an activity within the given reporting boundaries by a member of the SF Workforce that will result in a loss of productive work time. An injury is considered an LTI when the injured worker is unable to perform regular job duties, takes time off for recovery for more than one day, or is assigned modified work duties while recovering. Lost time injuries encompass both temporary injuries that keep the employee away from work for a day to permanent disabilities and conditions that prevent them from ever returning to the job or performing the same work tasks.

2.18. Occupational Injury / Illness

Illness:

Any abnormal condition or disorder suffered by any member of the SF Workforce, other than one resulting from an Occupational Injury, caused by exposure associated with the SF Work Environment. This includes acute and chronic illnesses or diseases which can be caused by inhalation, absorption, ingestion, or direct contact with physical, chemical, biological or psychological hazards in or associated with the SF work environment.

Injury:

Any abnormal condition or disorder suffered by any member of the SF Workforce caused by a single, instantaneous event in the SF Work Environment. Instantaneous events are characterised by a sudden and unexpected physical change which occurs over a short time and which results in immediate harm to people. A short time can be described as the snap of your finger or a single breath. Injuries include cases such as, but not limited to, a cut, fracture, sprain, or amputation.

2.19. Overdue Action

Any Action which have been accepted by the action owner and passed its agreed due date.

2.20. Pilot Plant / Organisation Unit

A plant or organisational unit voluntarily implementing or testing a SF Standard, procedure, process or equipment to gain knowledge and identify any issues prior wider roll out.

2.21. Precautionary

A measure taken from an abundance of caution.

2.22. Primary Containment

A tank, pipe, hose, IBC, drum or other equipment designed to keep material within it, typically for the purposes of storage, separation, processing or transfer of material.

2.23. Property damage

Any Damage to SF's Asset, Vehicles and Equipment during operational or business activities. Vehicles which have been properly parked are excluded from this definition.

2.24. Properly Parked Vehicle

A properly parked vehicle is one that is completely stopped and parked where it is legal to park such a vehicle or to stop for the purpose of loading or unloading persons or goods.

2.25. Recordable Case (RC)

A recordable case is a work-related injury or illness that does not involve death, one or more days away from work, or one or more days of restricted work or job transfer, and where the employee receives medical treatment beyond first aid. Medical treatment does not include visits to a physician or other licensed health care professional solely for observation or counselling, the conduct of diagnostic procedures, such as x-rays, blood tests and the administration of prescription medications used solely for diagnostic purposes.

2.26. Restricted Work Injury/Illness (RWI)

Any Work-Related Injury / Illness when an employer, physician or other licensed health care professional keeps or recommends keeping a member of the SF Workforce:

- From performing one or more of the routine functions of his or her job; or
- From working the full workday that he or she would otherwise have been scheduled to work or is transferred to a different job for all or part of his/ her period of recuperation.

A routine work/activity is considered to be a work activity the person regularly performs at least once per week as part of his or her job.

2.27. Safe Act

An observation of an intervention by a person or persons that made an Incident less likely or less severe.

2.28. Secondary Containment

An impermeable physical barrier specifically designed to mitigate the impact of materials that have breached Primary Containment. Secondary containment systems include, but are not limited to curbing around process equipment, drainage collection systems, etc.

2.29. Severe Vehicle accident

A Vehicle Accident which results in any of the following:

- SF Workforce Fatality, DAFWC or Recordable Injury associated with the vehicle accident
- Third Party Fatality associated with the vehicle accident
- Vehicle Rollover, where the vehicle involved is operated by a member of the SF Workforce.

2.30. SF

SF = Schur Flexibles

2.31. Schur Flexibles Group or SF Group or Group

Schur Flexibles Group or SF Group or Group means an organisation which contains a set of employees or contractors providing control, supervision, guidance, support and resources to the local entities. Local entities are providing operational capabilities, assets, human and financial resources and are the foundation of the Schur Flexibles Group.

2.32. Schur Flexibles local entity or SF local entity or local legal entity

Local entity means an entity which is totally or partly owned by the Schur Flexibles Holding, but under direct control, supervision, guidance by representatives of the Schur Flexibles Group. The local entity is headed by a Managing Director who is accountable for daily operations and legal compliance. Managing Directors are led by the Head of Operations who is part of the Schur Flexibles Group.

2.33. SF Group Health & Safety manager

A resource on SF Group level providing expectations, requirements, definitions, guidelines and support. SF Group Health & Safety manager facilitates organizational learning within the organisation. Furthermore the role is evaluating Schur Flexibles Group wide standards, performance and providing feedback to stakeholders on that matter.

2.34. SF (Cluster) Health & Safety manager

A fulltime resource on SF local entity level ensuring legal compliant operation, implement internal standards, requirements and practice. The role evaluate the Health & Safety Management status and ensure that the local operations is compliant to external and internal requirements. Furthermore the roles support the local workforce and management to participate in Group wide initiatives on organizational learning and providing feedback to Group stakeholders on that matter.

2.35. SF Health & Safety Coordinator

A part time resource on SF local entity level ensuring legal compliant operation, implement internal standards, requirements and practice. The role evaluate the Health & Safety Management status and ensure that the local operations is compliant to external and internal requirements. Furthermore the roles support the local workforce and management to participate in Group wide initiatives on organizational learning and providing feedback to Group stakeholders on that matter

2.36. SF Workforce

The SF Workforce comprises all SF Employees and all SF Contractors.

2.37. SF Work environment

The establishment and other locations (including) where one or more SF Employees and/ or SF Contractors are working or are present as a condition of their employment/ contract. The SF work environment includes not only physical locations, but also the equipment or materials used by the employee or contractor during the course of his or her work.

Note: The above definition is based on the OSHA definition and is used in the Work-Related Boundary. For further information see SF HEALTH & SAFETY Reporting Boundaries.

2.38. Spills

An unplanned or uncontrolled Release of any hazardous (flammable, toxic, irritating) material from Primary Containment (Pipe work construction, hoses, tanks, drums, buckets).

2.39. Unhealthy Condition

Any departure from the required or expected performance or condition of equipment (Plant), procedures (Process), or people, which, if not addressed, could result in a negative impact to the SF Workforce's health.

2.40. Unsafe Act

An observed behaviour that differs from the expected safe way of working that did not, but could have, either resulted in an Incident or made an incident more likely and/ or severe.

2.41. Unsafe Condition

Any performance or condition of equipment, procedure, process operations, or working environment that did not, but could have either resulted in an Incident or made an incident more likely and/ or severe spill.

2.42. Vehicle

Any means of motorised transport used on land. Vehicles are split into three sub-categories:

- Heavy vehicles Gross vehicle weight (unladen) 3.5 tonnes and heavier.
- Light vehicles Gross vehicle weight (unladen) under 3.5 tonnes.
- Self-propelled mobile plant or equipment.

2.43. Vehicle Accident

An Accident involving a motor Vehicle being operated by a member of the SF Employee while undertaking Business Travel resulting in Injury, or loss/damage.

2.44. Waiver

A temporary (time limited – max 1. year) exception granted by SF COO to a operations location/unit being partially exempted from a SF standard. A detailed statement and risk assessment need to be provided in advance of requesting a waiver.

