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1. Purpose

The purpose of this Environment, Health, and Safety (EHS) Policy is to describe our principles and commitments for how Elkem shall govern its environment, health, and safety work.

EHS involves the practical operational aspects of protecting the environment and maintaining employee's health and safety. EHS are, and will always be, a priority in Elkem's activities as our company's long-term success depends on ensuring that all activities are carried out in a way where we do not cause harm to people and have the least possible negative impact on the environment. This requires that all employees comply with and address their effort in a continuous manner toward promoting a compliant and sustainable working environment in line with the principles and commitments set out in this policy.

The EHS policy is anchored in Elkem governance policy.

2. Scope

This EHS Policy applies to all employees, including temporary personnel, and directors in Elkem ASA and subsidiaries, corporate affiliates, and joint ventures that are majority owned or controlled by Elkem (individually and collectively), commonly referred to as "Elkem" or "Group".

Elkem's activities are organised in a business structure consisting of Divisions, Functions and other units. Each Division is organised in plants, sales offices and other units reporting to the respective Division management. For the purposes of this policy, these organisational units will be commonly referred to as "Units". The same term will be used to refer to units organised in and / or reporting to a Function.

3. Principles, objectives, and commitments

Elkem strives to be an environmentally conscious company, with a safe and healthy working environment. Our EHS efforts are based on a zero-harm philosophy. A zero-harm philosophy implies protecting the health and safety of all people working at all Elkem locations. It also means running operations with resource-efficient processes and in such a way that negative environmental impacts are minimized throughout the value chain.

Elkem is committed to comply with all applicable EHS laws and regulations and develop its business in accordance with the UN Sustainable Development Goals and the Paris agreement of limiting the consequences of climate change.

Further commitments

- **Biodiversity:** Elkem is committed to preserving biodiversity and ecosystems around our facilities, including consideration of water quality, water use, soil conditions, habitats, vegetation, deforestation challenges and the physical stability of landforms and decommissioned structures. Elkem is committed to implement locally driven biodiversity activities at plant level based on the principles of avoid, reduce, restore, and regenerate and transform
- **Deforestation:** Elkem is committed to minimising the impact of our biocarbon strategy for existing forestry and does not accept deforestation in our supply chain. Only sustainably and legally produced biomass shall be used in Elkem's production.
- **Water:** Elkem is committed to efficient water resource utilisation through strong water management, including minimising any negative effects of discharge on the quality of water after use.



Our EHS commitments are show by:

- Having clearly defined responsibilities and accepting accountability for EHS at all levels of the organisation
- Prioritizing individual health and safety when choices must be made
- Setting ambitious goals and striving for continuous improvement in EHS
- Using the same EHS systems, tools, and methods, and having the same expectations to EHS performance wherever we operate around the world.

Our EHS management system are based on and defined by the following principles:

- **Principle 1:** “Improvement has no limits” defines the way we work encouraging employees to question current conditions and work continuously with improvements.
- **Principle 2:** “Zero harm philosophy” promotes the idea that all incidents and injuries can be prevented and highlights our priorities. Incident and injury prevention are just as important as production, quality, sales, delivery times, efficiency, and cost control.
- **Principle 3:** “Focus on understanding and removing causes” is about the importance of reporting, investigating, and mitigating any incident that may cause harm to people or the environment.
- **Principle 4:** “Hazard identification, risk analysis and action implementation” supports the efforts to truly understand possible negative effects of our operations and to mitigate them with effective measures.
- **Principle 5:** “Active involvement” highlights our human capital at all levels of the organisation as the most important prerequisite for success in our EHS work

3.1 EHS management system

Elkem’s commitment to protect EHS through continuous improvement, prevention, training, communication, and compliance with applicable laws and regulations, is enacted through our comprehensive in-house corporate EHS management system called FOKUS, which applies to all sites and activities worldwide.

Elkem’s EHS management system is built on recognized international standards for EHS management and covers applicable EHS topics that have been identified through extensive risk assessment at all sites.

Elkem’s corporate Vice President for EHS & CSR is responsible for Elkem’s EHS management system. Elkem Units are required to develop and manage their own EHS management systems in line with FOKUS that reflect and adequately mitigate identified risks in their Unit. This means that Units at all levels shall have EHS programs detailing how they manage applicable EHS challenges and comply with EHS rules and regulations. These include:

- Updated documentation of their activities, processes, equipment, and property.
- Updated listings of risk factors associated with these and measures to bring the identified risk down to an acceptable level.
- An overview of applicable EHS regulations (including national laws, regulations, and corporate requirements) for all its activities, processes, equipment, and property.
- Training activities and plans that ensure the necessary competence and experience to be able to work correctly seen from an EHS point of view.
- Goals and plans for its EHS work.
- Controls and documentation showing compliance with applicable EHS regulations.



Compliance with the EHS management system is subject to routine internal audits at site level conducted by corporate and divisional resources.

3.2 Organising of EHS work

EHS is a line responsibility and line management shall take primary responsibility for good EHS work and EHS results in the Unit. An appropriate number of competent EHS resources shall be hired and function both as a help-chain and a control function. Unit EHS managers should report directly to the top Unit manager and be a part of the Unit management team.

In addition to dedicated EHS resources joint EHS committees consisting of management resources and employee representatives are to be established in Units as advisory boards for EHS issues.

3.2.1 EHS resources

The number of EHS resources and the level of their competence is dependent on the Unit size, complexity and risk profile. Most production units will require at least one dedicated EHS resource. For larger sites with high risk, more staff or contracted roles such as an environmental manager, a safety coordinator and a company doctor or nurse may be appropriate. For smaller sites, these roles could be part of other functions.

In some countries, the availability of, and competence of EHS resources is regulated. Compliance to both local legislation and corporate standards is mandatory.

3.2.2 Professional resources

The following professional resources shall be available in all sites:

- Safety (EHS Manager - Safety Manager - Safety Coordinator - or similar)
- Health (Occupational Health)
- Environmental (EHS Manager - Environmental Leader)
- Fire and Emergency (Fire Chief - Industrial Defense – first aid)

Resources within each of these areas shall have the necessary competence tailored to site size, complexity and risk profile. Competence shall cover, as a minimum:

- Understanding of legislation and corporate requirements
- Risk mapping and risk analysis
- Preventive EHS work
- The FOKUS system and tools
- Deviation management and follow-up

3.3 Risk management

Each Unit is responsible for overall risk assessment and analysis covering all parts of their operations. The assessment shall be updated at least annually and / or on any major changes.



As part of the risk analysis, documentation showing how mapped risks are managed to an acceptable level, must be made. In cases where there are no satisfactory and lasting solutions that remove or reduce the risk to an acceptable level, there must be alternative short-term measures and specific scheduled plans for permanent solutions.

Detailed risk analysis shall be available for all systems, processes and operations. These are to be updated whenever changes are made to equipment or function, and / or when incidents or new information show that the risk is not sufficiently taken care of.

Risk analysis must always be in writing and, with the exception of SJA, kept on file until the next revision or until equipment / facilities are decommissioned and removed from the workspace.

3.4 Goals and plans

Elkem is committed to manage its EHS work by clearly defined by objectives. This involves annually setting targets for EHS indicators and monitoring status and deviations. Key indicators shall include both leading and lagging indicators. Each Elkem Unit has the overall responsibility for setting its own goals and for establishing and following up plans to reach these goals

An overall EHS plan based on the Unit's risk analysis and improvement needs shall be prepared annually and updated when needed.

Separate EHS plans shall be prepared for any change or transformation process that goes over time. Content and level of detail will depend on the complexity and scope of the change / project. Internal updating and monitoring of goals and plans must be documented.

3.5 Training and education

At Elkem, each employee shall be given the necessary training to be able to perform their duties in a safe manner without harm to people or things, and with the least possible negative impact on the environment. To address this, all Units, regardless of size, shall establish training programs which cover all employees and provide competence tailored to their tasks and the risks involved with them. This includes:

- EHS introductory courses that describe the Unit's risk, prevention activities and requirements for safe behavior.
- General training activities covering EHS topics and EHS tools
- Specific training activities for all working operation each employee is required to perform and all tools each employee is required to use.
- Routine competence follow-up refresher training when necessary

All training must be documented in writing.

3.5.1 EHS training

Each individual employees' closest leader is responsible for ensuring that mandatory EHS training is finished on time and that refresher training is done when needed.

Employees who are appointed to perform working operations and use equipment shall have adequate training to enable them to perform their duties in a correct and safe manner. This includes:

- Training in the correct way to do the job based on identified risk, standard practice and practical exercises.
- Training in connection with local public requirements for certification when using certain equipment or doing certain jobs (for example, using certain types of mobile equipment and cranes, and for work on electrical installations)
- Training in the safe use of all equipment / tools the person is to use.

All training shall be documented in writing and include verification of knowledge and skills.

3.6 Deviation and incident management

At Elkem we shall be prepared to do the utmost to prevent, but also handle incidents and deviation. All Units shall have systems and procedures for the reporting, investigating, correction and follow-up of deviations.

3.7 Audits

Compliance with EHS regulations and internal routines and requirements shall be checked routinely. This involves self-monitoring by documented self-assessment of own systems, procedures and activities by all Units, and periodic corporate audits of all Units. Production Units are audited by corporate (EHS Audit) minimum every other year. Smaller Units are audited when needed. Reports from corporate EHS audits are followed up through the divisional and plant internal board meetings. Corporate EHS is responsible for performing these audits and reporting results to divisional and corporate management. The divisional internal boards are responsible for following up progress on measures to correct deviations and implement improvement measures.

3.8 Establishment of specific EHS program

Specific EHS program shall be prepared by all units. The content and scope will depend on mapped activities and risks.

3.8.1 Environmental

All units shall have environmental programs covering the following topics regardless of activity level and risk:

- Energy and resource utilization
- Environmental impact through emissions to air and discharge to water
- Waste reduction and waste management

In addition, sites with activities that require public discharge permits, shall have a comprehensive environmental management system that meets requirements of ISO14001.

3.8.2 Health

All units shall have health programs covering the following topics regardless of activity level and risk:

- Ergonomics
- Psychosocial issues
- Noise



Production and storage sites, shall have health programs developed in the following areas:

- Mapping and control of harmful exposure
- Routine health follow-up
- Chemicals

3.8.3 Safety

All units shall have safety programs covering the following topics regardless of activity level and risk:

- Housekeeping
- Emergency preparedness and fire prevention
- Access control and asset protection
- Computer security and technology protection
- Fall prevention

Production and storage sites shall have safety programs covering the following areas:

- Mobile equipment
- Cranes and lifting equipment
- Machines
- Energy isolation
- Confined spaces
- Hot work
- Electrical work

For other production sites with special hazards, safety programs shall be developed for any special hazards mapped on site such as:

- Molten materials
- Flammable / explosive dust
- Chemicals
- Hazardous gasses

4. Roles and responsibilities

Elkem's Group CEO has the overall responsibility for Elkem Group's EHS work.

4.1 Implementation responsibilities:

- **Policy owner** is responsible for designing appropriate internal controls and necessary procedures to ensure compliance with the requirements set out in this policy

- **Unit managers** are responsible for implementing the requirements set out in this policy and associated procedures

4.2 Monitoring responsibilities:

- **Unit managers** are responsible for monitoring compliance with relevant procedures
- **Corporate Internal Control** are responsible for
 - Preparing an annual internal control report to policy owners and corporate management
 - Distributing the annual internal controls report to the respective policy owners and recommending corrective actions to close identified weaknesses / gaps

4.3 Correction and reporting activities

- **Policy owner** shall
 - Review the annual report from the internal control function and take action deemed necessary to ensure that any identified areas of non-compliance are satisfactorily addressed
 - Ensure continuous improvement of policy and related procedures based on identified weaknesses / gaps
 - Instruct Unit managers to implement corrective actions based on documented deviations
 - Verify that corrective actions are implemented and report back to Corporate Internal Control
- **Unit managers** are responsible for implementing corrective actions as prescribed by the policy owner

5. Definitions and abbreviations

Acronyms/ Definitions	Description
EHS	Used as a general term for activities related to Environment (external environment and impacts of our activities on this, both locally and globally), Health (working environment and health impacts of this), and Safety (prevention of harm to people and / or things, as well as reduction of harm when incidents occur).
EHS Program	Written documentation of specific efforts that are implemented on site to prevent harm from potential risk identified through risk analysis, and ensure compliance with applicable laws, regulations, permits and corporate standards. Includes also overview over available tools, responsibilities, and necessary follow-up
EHS Resource	Professionals who are employed or hired to coordinate and ensure the quality of the Units EHS work, and / or employees representatives elected to contribute to EHS work
FOKUS	Elkem's principal management system for environment, health and safety (EHS). FOKUS includes structure for EHS work, overall requirements (corporate standards), and tools for training and follow-up.

6. Deviation handling and approval

Anyone applying for a deviation from this policy must obtain written approval from the document owner before the change / activity is implemented.

The document owner is responsible for maintaining appropriate documentation of approved policy deviations.

7. References

Reference no.	Document name/description
GRP-GOV-POL-00	Elkem governance policy
GRP-GOV-PRO-03	Enterprise risk management procedure
GRP-EHS-PRO-02	EHS Incident management and reporting procedure
ECM-EHS-ST-040 EHS	EHS Standard

8. Policy maintenance

To ensure that its content remains current and relevant, this policy will be subject to the following maintenance activities:

- The policy owner is responsible for reviewing the content of this policy, making any necessary amendments, and capturing feedback from individuals deemed relevant by the policy owner.
- The policy owner must review the content on an at least annual basis, but amendments can be made at any time.
- The policy owner will circulate the amended policy to Compliance Committee for approval.
- Compliance Committee will review and (re-)approve the policy on an at least annual basis, but can also approve amendments on an interim basis, as they occur.
- Attachments to this policy may be approved by the policy owner, without the need for formal re-approval of the policy.

9. Revision log

Rev nr	Date	Changes	Changed by	Approved by
R01	01.08.2022	First issue, as part of new Group structure for governing documents.	Mark Breidenthal, VP EHS and CSR	Compliance Committee