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		created by	V. van der Meer
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# 1 Introduction <sup>1</sup>

## 1.1 Foreword

Euro Pool System senior management are committed to pay systematic attention to optimising and preserving good and responsible working conditions within our organisation.

The present Occupational Health and Safety Policy (OH&S) has been developed for this reason; it constitutes one of the means to achieve accident-free locations and a healthy working climate, as declared in the HSM 507 – Occupational Health & Safety strategy. Euro Pool System requires from all employees and temporary staff to cooperate to achieve this objective. The different departments, especially SHEQ, Human Resource and Operations should deliver teamwork in the field of Health & Safety.

The following occupational health and safety policy is a major element of our OH&S management system and is complemented by legislations, standards, and by Euro Pool System created risk inventories, working instructions and procedures. These documents are digitally available on SharePoint.

## 1.2 Policy statement

Our business conduct regarding safety, protection of human rights and protection of our planet is based on integrity and respect. The Euro Pool Group Code of Conduct states the following:

Our focus on safety also includes the safety for people: we are committed to a safe working environment in which everyone takes responsibility for their own safety and that of others. Safety always comes first, also for our people. <sup>2</sup>


## 1.3 Declaration of intent

When implementing its general company policy, Euro Pool System shall aim to focus its policy on the occupational health, safety, and well-being of its employees in order to prevent personal injuries, psychosocial risks and work-related stress or damage to their health. Visitors, temporary agency workers, customers and service providers are obliged to work by the same rules as our own employees.

Euro Pool System. shall comply with all legal requirements at the very least. Furthermore, it shall aim to lay down its own specific standards and rules for its field of activity. In a continuous optimisation process, it shall aim to improve and timely set priorities in the area of safety, health, and well-being. Euro Pool System reserves the right to also handle priorities according to its financial and practical possibilities.

To this end, a SHEQ team is established to organize and execute work-related Risk Inventories and Evaluations (RIE), means will be made available by the management and employees' responsibilities will be defined and measures will be taken.

<sup>1</sup> procedures are subject to changes; Intranet files are leading. Hard copy of the changes will not be distributed by the organisation  
<sup>2</sup> Code of Conduct, Euro Pool Group, 2022.

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Euro Pool System's employees will be involved in the implementation of this policy. They will be regularly informed of the nature of the risks to their health, safety, and the environment. To this end, these topics will be addressed at job trainings, staff meetings and in progress talks with the SHEQ coordinators.

The results of the OH&S measures will be published yearly in the SHEQ Annual Report together with an overview and an analysis of the accidents and incidents occurred during the period covered by the report.

Euro Pool System will regularly check its OH&S policy against its experience and the developments around OH&S legislation and technical improvements. When necessary, the policy might be modified at any time following these developments.

#### 1.3.1 Special groups

Euro Pool System is aware that some workers are more vulnerable than others and therefore are exposed to more or higher risks during their work. These special groups need extra attention.

##### **Youth**

The work assigned to young employees will be determined critically according to the requirements laid down in the OH&S Law regarding the kind of duties entrusted, working hours, information, instruction, supervision, and coaching.

##### **Pregnancy**

The moment a female employee makes it known that she is pregnant, the dangers for the pregnant employee will be addressed and, in agreement with the pregnant employee, the appropriate measures will be consequently taken.

##### **New employees**


New employees receive an introduction programme and are coached by a dedicated mentor in their work. Before a new employee is allowed to perform certain risky tasks, he/she is informed and given advice by his/her mentor with regard to the task at hand.

##### **Older and disabled employees**

Extra care should be taken with the disabled and or older employees (55 years old and older). This could comprehend more variation, lighter work etc. Human Resource shall define a policy in 2017 (HR Operational Plan).

##### **Other vulnerable groups**

Also, other special groups shall be included in HR policy, these concerns home workers, employees who work alone, temporary workers, trainees and employees who don't have a (good) command of the language in which country the employee works.

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### 1.3.2 Mental health and social well-being

Next to the prevention of physical harm, a second pillar is arising on the prevention of psychosocial risks and work-related stress leading to the enhancing of mental health and social well-being of the employees.

Psychosocial risks are the result of poor work design, support, organisation, and management, which may lead to work-related stress, burnout, or depression.

Some examples of working conditions leading to psychosocial risks are:

excessive workloads, conflicting demands and lack of role clarity, job insecurity, lack of involvement in making decisions, ineffective communication, and psychological harassment.

Another important risk is sexual harassment, aggression, discrimination (e.g., concerning religion, tender, regional provenance, or age) and violence.

Euro Pool System supports investigations to all the above subjects during medical checks, RIE's and by employee's representatives or councils. Any incident will be followed up, where requested Euro Pool System appoints confidential counsellors.

Euro Pool System requires a supportive work environment in which workers are well trained and motivated to perform to the best of their ability.

## 2 General

### 2.1 Occupational Health & Safety management system

The OH&S management system is a coherent set of policy, organisational and administrative measures that aims to gain insight into, manage and reduce where possible negative effects on the safety, health, and well-being of individuals within the organisation and of anybody else.<sup>3</sup>

Euro Pool System follows the requirements set in the ISO 45000 standard.

It helps both to implement the OH&S policy and to define and improve working conditions.

### 2.2 Scope


The OH&S policy applies to all Euro Pool System employees.

### 2.3 Purpose of the OH&S management system

The OH&S management system has the following important purposes:

- To guarantee effective OH&S care: a risk assessment policy and procedure (GEN 135/136) is in place. This policy includes prevention, control, and follow-up on the implementation of corrective action plans and their integration into operational management.
- To encourage the people concerned to contribute to controlling risks and gradually raising the standard of OH&S care.
- To incite the organisation to purposely learn from experience so as to be able to keep improving OH&S care (for example, to tackle risks more at their source).

<sup>3</sup> Anybody else: Customers, visitors, employees from other companies, temporary agency workers, etc.

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- To convincingly show customers, business partners and public institutions that OH&S rules are effectively documented.
- To give insight into how legal obligations in the area of OH&S are met.

### 3 Occupational Health and Safety Policy

#### 3.1 Objectives

The OH&S policy sets the following objectives:

- Prevent and limit any physical and psychological harm.
- Prevent and limit material damage.
- Safeguard and protect the organisation, its employees and third parties against undesirable effects.
- Pursue an integrated OH&S policy in accordance with its legal obligation within the framework of the OH&S Law.
- Pursue an absenteeism policy in accordance with its legal obligation, including logically related matters such as Periodic Occupational Health Examination and consultations.
- Establish an organisational structure of working conditions in which tasks, competences, obligations, and responsibilities are clearly defined.
- Create a good consultation structure among all parties concerned (employees, heads of departments and senior management). Check the policy on a regular basis against actual experiences of its application. The Policy should be modified as often as required by experience, adapted work methods, or working conditions as well as new developments.

Euro Pool System translates the objectives for Safety, Health and Well-being into action by adhering to the following principles:

- Solving problems detected in the risk inventory and evaluation.
- Setting tasks to managers regarding the supervision of compliance with OH&S obligations.
- Assigning tasks, responsibilities, and competences with regard to OH&S to the right level and function in the organization.


These objectives will be specified where possible and will apply to all relevant jobs and organisational levels.

### 4 Planning

#### 4.1 Planning for hazard identification

In order to be able to take measures to prevent accidents, occupational diseases and disasters, the nature and location of the risks within the organisation will be determined. To this end, Euro Pool System has developed the following procedures and working instructions for continuous hazard identification, risk assessment and the implementation of necessary measures:

- Risk assessment procedure.
- Accident & Incident reporting with root cause analysis and registration.
- Report, registration, investigation, and analysis of sickness absenteeism.
- Periodic Occupational Health Examination.
- Staff meetings (e.g., depot meetings, Functional Team SHEQ meeting).

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Periodic risk inventories and evaluations will take place and, when necessary, experts will be called in.

## 5 Implementation and execution

### 5.1 Structure and responsibility

Employees will be regularly reminded of their (own) responsibilities in terms of adopting the necessary caution and care to avoid dangers to themselves and others. This also includes complying with valid procedures, rules, and/or regulations regarding OH&S. Direct superiors will be responsible for supervising observance of these procedures, rules, and/or regulations and have a series of sanctions at their disposal to compel employees to work in a safer way. These sanctions will be defined and will be made known to all employees in advance.

### 5.2 Information, instruction, and training

All employees receive general as well as company and task-specific information and training related to OH&S topics and OH&S care. The information concerns risk to their safety, health, and well-being, and attention to correct work procedures, correct use of work equipment and personal protection equipment.

All new depot employees (EPS -, temporary - and depot service provider staff) receive an initial training by the depot manager. This training is about the general depot processes and the related risks. Task specific training is given about dangerous works, e.g., use of chemicals, working at heights. H&S training documents are available for this purpose.

Operations provide a series of documents for job training. Training shall be registered.

### 5.3 External services

Euro Pool System senior management commit themselves to calling in external services to:

- Execute and validate risk inventories and evaluations.
- Follow-up employees on sick leave (where applicable).
- Conduct periodic occupational health examinations.
- Offer occupational health consultation hours (where applicable).
- Conduct pre-employment medical examination (where applicable).


When needed, expertise services will be called in to give advice on adopted and to-be-adopted measures and on the implementation of measures.

#### 5.3.1 Absenteeism (where applicable)

Regular efforts will be made to drive back sickness absenteeism figures. Accurate registration of absenteeism and an adapted follow-up structure are two of the tools that will be employed to this end.

#### 5.3.2 Periodic Occupational Health Examination

All employees will be given the opportunity to undergo an occupational health examination. The content of the examination will be determined on the basis of the risk inventory and evaluation and the advice given by the HR department

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### 5.3.3 Occupational Health consultation hours (where applicable)

All employees will be given the opportunity to take advantage of occupational health consultation hours (after consultation of the HR department).

## 5.4 Regulatory compliance management

Euro Pool System maintains a digital system to register the relevant EC legal requirements. The system shall also contain relevant ISO and other standards to assure the legality of our processes and products.

## 5.5 Consultation and cooperation

Consultation meetings about safety will be organised with the concerned workers on a regular basis. Within the framework of legal employee participation regarding OH&S care council meetings with the managing director or business manager, HR and workers representatives are organised. Because participation implies obligations for employees, information and instruction will be promoted where necessary to increase awareness regarding these matters.

## 5.6 Documentation and document management

Relevant information will be collected and managed by the SHEQ department and the HR department. In turn, this relevant information will be spread within the organisation through:

- publications.
- intranet.
- staff meetings.
- etc

## 5.7 Administrative measures

Senior management and direct superiors have the task of ensuring that everybody becomes convinced that consistent OH&S care contribute to achieving better operating results. Senior management shall include in the annual plans the issues relating to OH&S care and making the necessary means and workplace layout available. All this should always be in connection and balance with the general developments in the organisation.

The existing risks to safety, health and well-being should be eliminated or at least mitigated as much as possible by adapting work methods, giving good instructions, and defining clear procedures.


Part of the relevant administrative measures is maintenance as well as periodic inspection.

## 5.8 Personal protection equipment

All employees should be protected while performing work activities in conformity with the existing requirements. To this end, the necessary personal protection equipment will be made available to all employees. See HSM 511 – industrial work clothes policy.

Furthermore, it is compulsory for all employees to wear this personal protection equipment and they are responsible for wearing it. If despite the information and repeated warnings this rule continues to be ignored, senior management and/or direct superiors can decide to impose sanctions on the employees concerned.



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## 5.9 Emergency and first-aid team

In order to limit consequences for employees and material damage in case of a disaster, company emergency facilities will be developed, and an in-house emergency and first-aid team organised. To this end, emergency team members will be instructed and trained. To be prepared in case of a disaster, the company locations will establish and adopt a local emergency plan. An evacuation exercise to test the emergency plan will be conducted at least once a year.

See HSM 506 – Emergency and evacuation plan.

## 5.10 Monthly Report

The SHEQ function will issue a Monthly SHEQ Report on the results of the efforts made in health, safety, and well-being.

# 6 Control and remedial measures

## 6.1 Accidents, incidents, and hazardous situations

A reporting procedure is in place to keep accurate and consistent records of accidents and incidents with the corresponding investigations, reports, and root cause analysis.

HSM 509 – accident and incident registration policy.

## 6.2 Corrective action plans and Project plans

The actions resulting from OH&S care - including RIE and SHEQ audits - will be defined in corrective action plans and project plans and later implemented. These plans will be evaluated on a regular basis and modified when necessary.

It will be regularly monitored if the responsibilities and the deadlines given to the different participants are adhered to.

## 6.3 Change management

Changes in the production process (e.g., chemicals, tools, machines, building) and newly contracted employees are the results of expanding businesses, innovations, legal requirements, and customer expectations. For this purpose, the GEN 134 - Change management policy is in place to inform all departments about the necessary actions to be taken to continue working in a safe environment in a safe manner according the OH&S legislation and standards.

## 6.4 Audits & Certification

Euro Pool System developed a policy regarding the implementation of internal audits. See GEN 126 – Audit and certification policy for details and example audit checklists.

A yearly audit plan is drawn up including all Euro Pool System locations. Non-conformities as a result of audits or other controls are included in the local corrective action plan.

Euro Pool System has the strategy to comply with international standards such as ISO 45001 and get certified in all regions by 2025.

## 6.5 Validation and Verification

Senior management will yearly review the applicability and effectiveness of the OH&S policy. Whenever necessary plans will be revised and/or new projects will be defined.

The sole objective will be to improve the company's OH&S policy.