

Occupational Health and Safety Policy



“Ensuring occupational health & safety is a fundamental component of acting responsibly.”

Klöckner & Co is one of the largest producer-independent distributors of steel and metal products, serving as a critical link between steel/metal production and consumption. Klöckner & Co's company culture is based on the following values: collaboration, excellence, and responsibility.

The Management Board of Klöckner & Co SE considers safeguarding the health and safety of its employees and partners a fundamental element of corporate governance. In alignment with our business model, we not only acknowledge our responsibility to ensure occupational health and safety within our own operations but also strive to promote these standards across our global value chain.

This Occupational Health & Safety Policy serves as a framework for maintaining and improving health and safety standards. All employees are required to adhere to and actively implement the principles outlined in this policy in their daily activities to create a safe and healthy working environment.



Guido Kerkhoff
Chairman of the
Management Board (CEO)



Dr. Oliver Falk
Member of the
Management Board (CFO)



John Ganem
Member of the
Management Board (CEO Americas)

1.1. Scope of the policy

The scope of application of this occupational health and safety (“OHS”) policy extends to our own business area, including all group companies in which we have a decisive influence. These are companies in which Klöckner & Co directly or indirectly holds most shares or voting rights. This policy applies to all employees, managers, and Management Board members of all group companies belonging to Klöckner & Co.

In order to provide a safe and protected environment, all of our employees and further stakeholders are obliged to follow and actively comply with this global OHS policy statement. In the case of discrepancies between local laws and this OHS policy, the stricter of the two will always be enforced. Klöckner also expects its business partners, such as its suppliers and subcontractors that they commit to their responsibility in occupational health and safety.

1.2. Accountability

The Management Board of Klöckner & Co considers employee health and safety to be a fundamental element of corporate governance. All global, regional, local management and the respective division heads are accountable and thus have to ensure that these standards and commitments are implemented, communicated, monitored, and integrated into the working procedures in the respective organization.

- Ensuring adherence to established safety standards and protocols.
- Developing, implementing, and overseeing the organization's strategy for occupational safety.
- Aligning safety strategies across different country organizations.
- Reporting safety activities, developments, and outcomes to the responsible Manager.
- Conducting joint training sessions focused on occupational safety practices and promoting an effective safety culture within the organization.

In addition, at the country and branch level, occupational safety teams focus on:

- Continuously and systematically reducing the risk of accidents.
- Enhancing employee safety awareness within the workforce.
- Implementing safety measures at the regional level.
- Conducting thorough risk analyses.
- Coordinating training sessions across different sites.



Klöckner & Co Employees

Every employee is responsible for:

- Contribute to maintaining a safe and healthy work environment.
- Adhering to all health and safety protocols and procedures.
- Following local safety guidelines during all tasks.
- Promptly reporting hazards to supervisors.
- Participating in local mandatory safety training sessions.

1.3. Reference to third-party standards and initiatives

We strive to develop our systems and procedures in accordance with global health and safety standards, including OHSAS 18001/ISO 45001, and establish health and safety goals and specific targets based on these guidelines. In areas where these certifications have not yet been implemented, we are actively working towards achieving them.

1.4. Consideration given to the interests of key stakeholders in setting the policy

In setting our OHS policy we prioritize the interests of our key stakeholders, including employees, management, customers, and suppliers. Our employees' well-being is at the forefront, ensuring a safe and healthy work environment. We also consider the expectations of our customers and suppliers, maintaining stringent local safety protocols to ensure trust and reliability.

1.5. Accessibility of the policy

The OHS policy is available for employees on the SharePoint platform. External stakeholders can access it on Klöckner's official website (kloeckner.com) under the 'Sustainability' section.

2.1. Description of material impacts, risks and opportunities regarding occupational health and safety

Employees face numerous risks in the logistics industry, and addressing these risks is crucial for their well-being (*). One significant concern is **manual handling injuries**, which can result in strains, sprains, and back injuries from lifting, carrying, or moving heavy loads. To mitigate these risks, we emphasize the importance of proper training and ergonomic practices.

Slips, trips, and falls are common hazards in our facilities, often caused by wet or uneven surfaces and poorly maintained walkways. Regular maintenance and housekeeping are vital to preventing such incidents and ensuring a safe working environment.

Vehicle-related accidents pose significant risks, including collisions involving forklifts, trucks, and other vehicles. To reduce these hazards, we implement traffic management plans, ensure proper vehicle maintenance, and emphasize road safety protocols. **Road safety** remains a critical aspect of our logistics operations. Employees operating vehicles must adhere to strict protocols, including observing speed limits, wearing seat belts, and avoiding distractions such as mobile phones while driving.

Repetitive strain injuries (RSIs) can develop from repetitive tasks and prolonged periods of standing or awkward postures, leading to musculoskeletal disorders. Conducting ergonomic assessments and implementing job rotation can help alleviate these risks. Additionally, exposure to **high noise levels** from machinery and vehicles, as well as whole-body vibration, can cause long-term health issues. Monitoring noise levels and providing appropriate hearing protection are essential measures to address these risks.

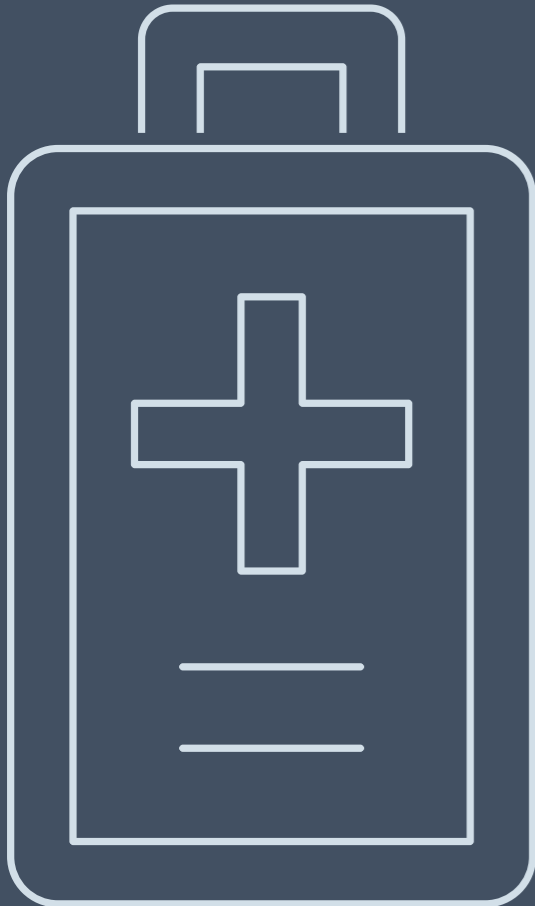
The use of **personal protective equipment (PPE)** is essential in mitigating various health and safety risks. Regular training on the correct use and maintenance of PPE is provided to ensure maximum effectiveness. Supervisors are responsible for ensuring that PPE is used correctly and consistently in all relevant tasks.

Exposure to **chemical, physical, or biological agents** presents a significant health risk. Implementing stringent safety protocols, providing necessary PPE, and conducting regular safety training can mitigate these dangers effectively.

Another critical issue is **excessive physical and mental fatigue**, particularly through inappropriate work organization related to working hours. Ensuring proper scheduling, adequate rest periods, and promoting a healthy work-life balance are crucial to preventing fatigue-related incidents and improving overall employee well-being.

2. Material impacts, risk and opportunities, and general objective of the policy





First aid kits are strategically placed throughout our facilities to ensure immediate access in case of an injury or medical emergency. Regular checks and maintenance of first aid kits are conducted to ensure they are fully stocked and compliant with health and safety regulations.

At Klöckner & Co, we are committed to regularly reviewing and updating our local health and safety policies to reflect best practices and regulatory requirements. Through proactive risk management and employee engagement, we strive to create a workplace where safety is a shared responsibility and a core value.

To continually improve our OHS performance, we manage Health & Safety through appropriate management systems. The key elements are:

- **Accident Prevention Goal:** We strive towards eliminating workplace accidents and injuries through proactive safety measures and continuous improvement.
- **Conducting risk analyses** to ensure compliance with internal and external requirements
- **Safety Training:** Ensure all employees receive thorough and ongoing training in health and safety practices, tailored to their specific roles and responsibilities.
- **Consistent Safety Standards:** Maintain a Group-wide minimum safety standard, ensuring all locations adhere to stringent health and safety regulations regardless of local certification status.
- **Engaged Safety Culture:** Foster a culture where safety is a shared responsibility, encouraging active participation and safety-conscious behavior among all employees.
- **Innovative Safety Solutions:** Invest in advanced safety technologies and ergonomic solutions to enhance the well-being and efficiency of our employees.
- **Collaborative Safety Efforts:** Facilitate regular exchange of best practices and safety strategies across our global operations through dedicated working groups and meetings.
- **Continuous Monitoring and Improvement:** Regularly assess and refine our safety programs and practices based on data, feedback, and evolving industry standards.

2.2. Description of general objective of the policy

The primary objective of this OHS policy is to describe our minimum OHS standard requirements as well as to create and maintain a safe, healthy, and secure working environment for all employees and business partners at Klöckner & Co. Therefore, all Klöckner operational sites must ensure the safety health and welfare of all employees.

3.1. Description of the processes to identify potential hazards

The risk assessment must be carried out before starting the activity, before using the work equipment or before commissioning the workplace. In other words, it must be carried out before selection and then during the process. The risk assessment must be updated in the event of changes, e.g. if new work processes are introduced or regulations are changed.

Process:

1. New work equipment or workplace is planned to be introduced.
2. Determination of the intended use and foreseeable misuse.
3. Determination of the hazard, hazardous situation and hazardous events.
4. Risk assessment:
 - 4.1. Determination of the expected extent of damage.
 - 4.2. Company-specific assignment of the duration of use or duration of stay in the hazardous area for the work equipment.
5. Risk assessment through categorization into risk classes.
6. Check whether measures are required for the work equipment on the basis of standardized assessment criteria.
7. Plan and implement risk reduction measures depending on the risk class.
8. Check the effectiveness of the measures.

3.2. Description of accident analyses

Accidents throughout the Klöckner Group are documented in an independent process that is subject to regular external audits. Various additional data points are collected during the course of the accident in order to monitor overarching patterns in accidents. In addition, our individual business units will take appropriate action to address the incident in accordance with local legislation and individually defined procedures.

3. Process for monitoring



4. Metrics

Klöckner & Co's overarching goal is to consistently reduce the number of work-related accidents in the Group. The key figure for monitoring and managing this process is the lost time injury frequency (LTIF). This is defined as the number of accidents divided by the number of working hours multiplied by 1,000,000. We include accidents from the first day of absence. This metric is closely monitored for all our business units and reported to the Management Board on a monthly basis.

5. Inquiries and Feedback

If you have questions or comments about this declaration or about other topics related to occupational health & safety, please email our Strategic Sustainability Department (Email).

Please direct any complaints or reports about noncompliance with this policy to our complaint mechanism: "Let us know" whistleblower system / complaint mechanism | Klöckner & Co SE (kloeckner.com)

For other terms not defined, please see the glossary on our website at <https://www.kloeckner.com/en/glossary/>.

* This list of occupational health and safety risks is not exhaustive and may be updated as new hazards are identified.



