

GAG-HR-003-P-EN Health & Safety Policy

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Axel Kühner
Chief Executive Officer

1 Purpose of the policy

- ▶ This policy establishes the basis for the requirements placed on the employee and health protection system, the fulfillment of responsibilities and tasks on the part of managers, and the involvement of all employees in our companies.
- ▶ This policy provides support for compliance with legal and official provisions and facilitates the process of creating and maintaining safe and healthy workplaces.
- ▶ The policy promotes responsible behavior on the part of management and increases the importance of and appreciation for occupational health and safety among supervisors. Varying approaches to these aspects among management make it difficult to achieve lasting improvements in occupational health and safety. This exposes employees to risks, including injuries, lasting harm, or work-related illnesses, and can have legal consequences for companies and people they employ in positions of responsibility.
- ▶ This policy is intended to help prevent high rates of accidents, illnesses, and turnover in our companies.
- ▶ The policy helps to save costs by decreasing the amount of working time lost by employees and machines as a result of accidents and by decreasing work-related illnesses.
- ▶ This policy should allow us to create greater synergy in the occupational health and safety space.
- ▶ Continually addressing these topics results in a positive employer image in the public eye and increases customers' trust in our performance as well as in our own quality standards.

2 Scope

- ▶ This policy sets out minimum standards and applies to all companies worldwide in which Greiner holds a majority stake. More extensive, country-specific rules for the protection of workers going above and beyond this policy must be followed in all cases.
- ▶ It applies to everyone who is in employment and quasi-employment relationships with Greiner – i.e., in particular, to all employees, those working on a contractual basis, freelancers, and similarly (where applicable) external partners.
- ▶ Violations of this policy can lead to consequences under employment law.

3 Rules of the policy

REQUIREMENTS

- An internal health and safety officer must be appointed for every Greiner company with appropriate powers and resources (authority to make decisions and give instructions, budget for standard/recurring purchases). Where necessary, budget resources must be made available for unscheduled projects/investments.
- A certifiable management system with an emphasis on health and safety must be set up, maintained, and upgraded according to each company's specific timetable.
- A system for regular inspections at the companies, with the involvement of supervisory staff, must be introduced and maintained. The necessary time resources must be made available for carrying out the inspections.
- A system must be set up and maintained to inform and continually involve all employees in the employee protection system.
- A reporting system for dangerous or unsafe situations and unsafe behavior, as well as a system for analyzing incidents, must be set up and maintained.
- Managers are to receive mandatory training and further education in occupational health and safety.

- Internal health and safety key performance indicators must be specified and goals set based on these. These goals must be integrated in management's agreed targets.
- Employee health and safety must be considered when setting up workplaces in accordance with the STOP principle (see Section 5.8).
- Prevention specialists must be involved in new building and renovation projects, when designing or redesigning workplaces, and when selecting and purchasing new machines and systems, working materials, and personal protective equipment.
- A health program designed for the respective company must be created, developed, and implemented.
- Special consideration must be given to employees' individual physical condition and capabilities when setting up workplaces.
- Managers must act as role models for safety- and health-conscious behavior. Moreover, every employee at Greiner must act in the interests of their own health and safety as well as the health and safety of others.
- The rules of conduct, policies, and instructions established at the individual companies must be observed to the extent that they do not contradict the provisions of this policy.
- Compliance with the rules of conduct, policies, and instructions must be monitored, and these checks must be documented.

PROHIBITIONS

- Legal and regulatory obligations must not be neglected.
- Failure to comply with the principles of occupational health and safety due to negligence is prohibited.
- Established rules of conduct, policies, and instructions must not be violated.

4 Implementation

- ▶ The policy enters into force on May 1, 2021.
- ▶ An inspection system, a reporting system for dangerous situations, and a system for analyzing incidents must be implemented no later than six months after the policy enters into force.
- ▶ A period of six months after the policy's entry into force is allowable for the appointment of a health and safety officer.
- ▶ A company-specific timetable for the introduction, maintenance, and development of a certifiable management system with an emphasis on health and safety must be prepared within six months after the policy enters into force.
- ▶ Managers must be trained accordingly, internal key performance indicators must be specified, and these figures must be incorporated in the agreed management targets within a year after the policy becomes valid.
- ▶ All other sections are valid after the policy enters into force.

5 Definitions and further information

5.1 Health and safety officer

- ▶ The health and safety officer is the point of contact at the respective company for matters relating to the protection of health and safety and the coordination of prevention specialists at the companies. The health and safety officer is supported by the prevention specialists.
Duties: Maintaining an overview of the key documents, activities, and programs; following up on measures taken; coordinating activities with the prevention specialists, etc.

Requirements: Basic training qualifying the individual as a safety representative (point of contact for employees on occupational health and safety issues), adding these activities to their job description.

Detailed description: "Description of the role of health and safety officer" (Section 5.13).

An individual is not permitted to simultaneously serve as health and safety officer and as an external prevention specialist.

- ▶ The appointment of a health and safety officer does not absolve the managing director or other roles bearing responsibility under company law from their overall responsibility for occupational health and safety in accordance with the respective national laws, other mandatory standards and provisions, or any internal rules relating to these matters.

5.2 Management system

A management system is a system such as ISO 45001 or similar, introduced and maintained in a manner that makes it suitable for certification.

5.3 Inspection system

An inspection system, which serves as a preventive measure for the early detection of deficiencies from both an internal and external perspective, must include the following at a minimum:

- Quarterly inspections of the entire company by safety representatives or other qualified employees from the companies.
- The entire company is to be inspected once every year with the participation of qualified employees from other Greiner companies (prevention specialists, safety representatives, etc.)
- The entire company is to be inspected once every year with the involvement of managers (company management, production/departmental management).
- The results of the inspections must be documented.
- Measures must be specified in order to remedy deficiencies and prevent dangerous situations.
- The implementation of the measures must be followed up on and ensured by company management.

5.4 Involvement of employees

- ▶ Employees' responsibility for their own health and safety must be strengthened.
- ▶ Employees' understanding of the usefulness and necessity of health and safety systems must be developed.
- ▶ A constructive culture of error reporting and improvement must be developed, and employees must be made aware of occupational health and safety matters.

This can be achieved, for example, by:

- Including these aspects as fixed items in staff meetings and performance reviews, discussing topics relating to employee safety in regular meetings, etc.
- Motivating employees and acknowledging their efforts through competitions, prizes, etc.
- Regularly informing employees regarding work accidents, the relative progress of employee protection measures, etc.
- Questioning new employees regarding the occupational health and safety situation.

- Using checklists for regular self-evaluations of workplaces.
- Conducting inspections on a regular basis.

5.5 Reporting system for dangerous or unsafe situations and unsafe behavior, incident analysis

- ▶ Dangerous or unsafe situation: Unplanned event that (suddenly) arises and did not result in an illness, injury, or damage, but had the potential to do so.
- ▶ Unsafe behavior: Behavior that could result in an incident involving injuries.
- ▶ Detecting and remedying dangers in the workplace in order to prevent accidents involving injuries and lost working time resulting from this.
- ▶ Reporting system for dangerous or unsafe situations and behavior to prevent accidents.
- ▶ Incident analysis: More in-depth analysis of work accidents according to preferred methodology (similar to QM), involving the supervisor, prevention specialists, and the safety representative.

5.6 Training for managers

- ▶ Mandatory basic training for managers at all levels regarding their obligations with respect to employee protection. New managers must complete this basic training within a year of joining the company or being appointed to their role.
- ▶ Regular, recurring further training.

5.7 Key performance indicators and targets

- ▶ Key performance indicators include accident rates, accident frequency, rate at which dangerous situations are reported, rates at which agreed measures are processed, and the quality of measures.
- ▶ Targets include percent decrease in number of accidents, minimum number of reports of dangerous situations, rate at which inspections are conducted, progress of measures.

5.8 STOP principle

- ▶ Preventing dangers (**s**ubstitution) takes precedence over **t**echnological, **o**rganizational, and **p**ersonal protection measures (collective protection comes before individual protection).

5.9 Involving prevention specialists and other specialists

- ▶ Prevention specialists:
Provide expert advice and support the employer, managers, employees, and employee representatives with matters relating to occupational health and safety.
- ▶ The involvement of prevention specialists (occupational physician, safety specialists) is required in Austria under the Workers Protection Act (*Arbeitnehmerschutzgesetz*; ASchG). In the case of companies located in countries where this involvement is not required, prevention specialists are to be involved if available – or, failing that, other specialists in occupational safety and health protection should be brought on board.
- ▶ Definition and duties of the safety specialist:

Person with training in technical aspects of employee protection:

Advises employer, employees, employee representation bodies, and safety representatives on matters

relating to occupational safety and humane working conditions; also supports the employer in fulfilling their duties.

► Definition and duties of the occupational physician:

A person with medical training specializing in workplace conditions:

Advises the employer, employees, and employee representation bodies on matters relating to health protection, promoting health in terms of the working conditions, and humane working conditions; also supports the employer in fulfilling their duties.

► Other specialists
(e.g., occupational psychologists, ergonomists, chemists)

5.10 Health programs

- Health programs tailored to the company, e.g.: Program for companies with a high proportion of shift and rotating shift workers (especially night shifts).
- Ergonomics programs for companies with frequent lifting and carrying work, etc.
- Other examples: Vaccinations, eye exams, hearing exams, healthy diet, physical examinations.

5.11 Employees' physical condition and individual capabilities

- When delegating tasks to employees, consideration should be given to their suitability for the task in terms of health and safety. Special consideration should be given to their general condition and physical vitality, age, and skills and qualifications.

5.12 Safe behavior, rules of conduct, policies

- An employee's behavior consists of their observable actions, and these actions should always aim to avoid endangering or injuring themselves and others.
- Safety guidelines, operating instructions, and rules issued in training sessions, briefings, and meetings must be worded such that employees can understand, comply with, and review them.
Regular checks must be carried out to ensure compliance, and these checks must be documented.

5.13 Description of the role of Health & Safety Officer

Reporting Line	Irrespective of the organizational integration of the function, the Health & Safety Officer must report directly towards the Managing Director in all H&S issues, and respectively has the right to report directly to the Managing Director regarding all H&S issues.
Objectives	<ul style="list-style-type: none"> > Preventing work-related accidents and illnesses > Preventing working time from being lost for occupational reasons > Improving occupational health and safety at the company > Internal point of contact for employees and supervisors
Duties	<ul style="list-style-type: none"> > Organizing and coordinating occupational health and safety at the company > Coordinating risk assessments, following up on and overseeing the agreed improvement measures > Monitoring compliance with legal and normative requirements > Participating in inspections of the company and accident investigations > Demonstrating exemplary behavior that is conducive to health and safety > Developing and maintaining an occupational health and safety management system (OHSAS 18001 or ISO 45001)*
Authorized to	<ul style="list-style-type: none"> > Report to the relevant managers > Escalate to the next management level and Managing Director
Responsibilities	<ul style="list-style-type: none"> > Determining key performance indicators according to specifications > Forwarding information to division holding company > Contact for health and safety activities > Documenting activities
Requirements	<ul style="list-style-type: none"> > Basic knowledge of the country's specific health and safety laws (compare: safety representative training in Austria) > Knowledge of relevant standards > Interest in occupational health and safety
Other	<ul style="list-style-type: none"> > Employee's declaration of consent (legal responsibility is not transferred to the employee!) > Description of the workplace > Reporting by employee to division management > Logging working time
Expenditure	<ul style="list-style-type: none"> > Minimum hourly commitment per year: (risk weighted excluding initial development of OHSAS 18001 or ISO 45001) <p>0.5 hours: per employee / salaried employee / white collar / office or office-like activities</p> <p>1.0 hour: per employee / worker / blue collar / production</p> <p>For smallest companies (20–25 employees): at least 10 hours</p> <p>Exceeding these amounts is always possible and desirable.</p>

List of changes

Version	Date	Author	Description
0.1	April 11, 2018	Reinhard Schober	Document created and initial content written
0.X	April 13, 2018	Claudia Major, Reinhard Schober	Revision
0.X	June 4, 2018	Elisabeth Gabler, Reinhard Schober	Revision and changes
0.X	July 5, 2018	Reinhard Schober	Revision
0.X	July 17, 2018	Stefan Grafenhorst, Reinhard Schober	Revision
0.X	March 26, 2019	Reinhard Schober	Revision
0.X	May 13, 2019	Reinhard Schober	Adaptation to new template, implementation of ISO 45001 deadline removed
0.X	June 7, 2019	Reinhard Schober, Claudia Major	Revision and finalization
0.X	August 2019 October 2019	Claudia Major	Coordination with Executive Board Coordination and exchange of experiences with HR
0.X	November 2019	Claudia Major Reinhard Schober	Integration of changes based on coordination and exchange of experiences with HR
0.X	January 2020	Claudia Major	Information added
0.X	March 2020	Reinhard Schober	Near-accident deleted, dangerous situation and dangerous behavior added; effective date
0.X	November 2020	Reinhard Schober	Description of role of health and safety officer
0.X	November 2020	Claudia Major	Wording revised
0.X	April 2021	Claudia Major	Adaptation of role description of Health & Safety Officer
1.0	12.04.2021		Finalisation