

Occupational Health and Safety Policy – Spadel Group



Spadel

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1 Introduction

The health, safety and well-being of our employees is an absolute priority for the Spadel Group. Our aim is to guarantee a safe, healthy and inclusive working environment in which every employee, temporary worker or subcontractor can perform their duties in the best possible physical and psychological conditions.

This policy formalises the Group's commitments in terms of accident and health protection, safety culture and the management of risks associated with industrial activities. It is in line with Spadel's global sustainability strategy and the Corporate Sustainability Reporting Directive (CSRD), in compliance with ESRS S1 - Occupational Health & Safety and GRI 403 - Occupational Health & Safety.

The health and safety management systems deployed within the Group are based on the relevant legal requirements, applied or integrated depending on the site, backed up by industrial excellence programmes and local prevention initiatives.

2 Objectif

The aim of Spadel's Health and Safety Policy is to prevent all work-related accidents, occupational illnesses, as well as physical and mental health problems linked to working conditions. The objective is to protect the life, health and well-being of all those working on Group sites, while promoting a «zero accident» culture based on shared vigilance, individual responsibility and continuous improvement.

Spadel is committed to ensuring safe working environments, strengthening training and awareness among its teams, and integrating health and safety into all operational and managerial decisions

As part of this commitment, Spadel includes mental health within its policy framework and provides all employees with an anonymous and confidential psychological support service, the WPO (Workplace Options) programme, available free of charge 24/7.

3 Scope

This policy applies to all Spadel Group subsidiaries, production sites and operating entities.

It covers the prevention of occupational accidents and diseases, process and facility safety, workplace hygiene and ergonomics, the management of contractors and visitors, as well as the physical and mental health of employees.

The framework is based on existing management systems and the national legislation in force in each country where the Group operates. Mental health is also an integral part of risk analysis, including psychosocial risk assessment.

3.1 Occupational risk prevention and management

- **Approach**

Spadel applies a structured approach to the prevention and management of occupational risks, based on the identification, assessment and control of hazards associated with its activities.

Each site carries out periodical risk analyses covering physical, chemical, ergonomic, psychosocial and environmental risks. The results of these analyses are used to define specific prevention plans, which are revised at least once a year or after the occurrence of any significant change.

Activities involving particular risks, such as maintenance, working at height, electrical work or handling chemicals, are governed by specific safety procedures and, where applicable, work authorisations. Internal audits, safety observations and management reviews are used to check the effectiveness of the system and rectify any discrepancies identified.

- **Commitments**

Spadel undertakes to systematically identify and assess risks at all workstations, keep prevention plans up to date and guarantee effective implementation of the associated control measures. The Group ensures regulatory compliance at each of its sites and applies internal safety standards consistently across all operations. Training, awareness-raising and regular risk communication are key drivers of this policy. Management plays an active role in promoting a prevention culture and analysing feedback following incidents. Monitoring includes tracking the number of accidents and incidents, which are analysed using the Group KPIs to assess performance and continuous improvement.

- **Indicators and monitoring**

Safety performance is monitored through consolidated indicators at Group level, such as accident frequency and severity rates, the number of incidents reported, the number of corrective actions completed, and the safety training rate per employee. This data is collected and verified by site H&S managers, analysed during quarterly reviews and incorporated into annual reporting in accordance with GRI 403 and CSRD requirements.

3.2 Health, well-being and working conditions

- **Approach**

Spadel adopts a comprehensive approach to occupational health, combining medical prevention, ergonomics, hygiene and the promotion of psychological well-being.

Each site has an in-house or external occupational health and safety department, working in cooperation with accredited occupational physicians. Workstations are regularly assessed to identify risks of musculoskeletal disorders, noise exposure or thermal stress, and to implement any necessary improvements.

Mental health and psychological well-being are an integral part of the system: psychosocial risk analyses are conducted, with actions implemented to prevent stress and promote well-being. The WPO (Workplace Options) programme offers every employee and his or her family free, anonymous and confidential psychological support, available at any time and in the local language.

The Group also maintains group health insurance for all employees, ensuring equitable access to medical and psychological care.

- **Commitments**

Spadel is committed to protecting the physical and mental health of all its employees by ensuring safe and appropriate working conditions. The Group endeavours to prevent stress, fatigue and psychosocial risks through organisational and support measures. It guarantees the statutory medical monitoring for each job category and ensures that working environments comply with principles of ergonomics, hygiene and comfort. Social dialogue and the active participation of employee representatives are essential to improving working conditions and fostering collective well-being. The WPO programme fully supports this approach by providing professional and confidential assistance to employees, contributing to stress prevention and overall well-being.

- **Indicators and monitoring**

Monitoring indicators include absenteeism rates, the number of health and well-being training initiatives, the tracking of ergonomic adjustments implemented, and the results of employee satisfaction or workplace climate surveys. This data is collected by the HR and H&S teams, consolidated annually and reviewed by the Executive Committee as part of social reporting and CSRD management. Staff turnover and average length of service are also analysed at Group level, as indicators of social stability and job satisfaction.

3.3 Subcontractor management and safety

- **Approach**

Managing the safety of subcontractors and service providers is a key element of the Group's health and safety policy. Prior to performing any work or services, external partners are assessed with regard to their safety skills and regulatory compliance. Prevention plans and work authorisations are drawn up jointly where operations present particular risks. While work is in progress, subcontractors are included in safety briefings and are subject to regular checks by site managers. Incidents and risk situations are documented, shared and analysed to avoid any possible recurrence.

- **Commitments**

Spadel is committed to applying a rigorous process for assessing, authorising and monitoring subcontractors working on its sites, ensuring the same safety standards for all participants, both internal and external, as well as guaranteeing the necessary training and information prior to any work or services being performed. Shared vigilance and proactive reporting of dangerous situations are encouraged at all levels in order to foster a shared safety culture among Spadel staff and its partners. Each subcontractor is assessed at least once a year on its safety performance and cooperation may be terminated in the event of unsatisfactory results in this regard.

- **Indicators and monitoring**

Performance monitoring includes contractor safety training rates prior to intervention, the number of incidents involving subcontractors, the level of compliance with prevention plans and the results of safety audits carried out. These indicators are consolidated within site health and safety reports and analysed during H&S reviews in order to identify priorities for improvement.

4 Review and continuous improvement

Spadel's XX brings this policy to life and ensures it is properly implemented.

The Health and Safety Policy is reviewed annually to incorporate the results of internal and external audits, feedback, regulatory changes and the priorities of the industrial excellence program. Performance indicators are monitored as part of CSRD reporting and, in the event of deviations, are subject to corrective action plans that are documented and monitored. This continuous improvement approach relies on collective commitment, feedback from the field, and the promotion of local initiatives such as Safety Days and internal awareness-raising campaigns.

5 Publication and communication

This policy is approved by Spadel Group management and distributed to all employees, service providers and partners. It is published on the Group's website and included in the Sustainability Statement and Annual Report. Spadel is committed to communicating transparently with regard to its health and safety performance, sharing best practices between sites, and maintaining an ongoing dialogue with internal and external stakeholders.

Annex

Spadel's Health & safety policy addresses material impacts, risks and opportunities (IROs) identified during Spadel's double materiality assessment (DMA) and includes key considerations essential for the health and safety of all employees.

Table 1. Material IRO's in the scope of Spadel's Health and safety policy.

| Type of IRO | Material IRO |
|-----------------|---|
| Positive impact | Enabling a good work-life balance fosters economic prosperity, social inclusion and good health. |
| Positive impact | Reduction of workplace accidents in Spadel's plants. |
| Positive impact | Improve employee well-being by taking both personal and professional employee circumstances into consideration (via policies). |
| Risk | A severe work accident (death or permanent bodily injury) for which the Group's liability would be engaged could adversely affect the Group's reputation and image. |
| Risk | A major health crisis could adversely affect the entire Group's activities. |