



ERCO Worldwide LP Health, Safety & Environment Policy

Effective Date: April 9, 2021
Last Review Date: April 9, 2021
Next Review Date: June 1, 2023, or sooner if required by law
Approved by: Board of Directors

Purpose and Scope

ERCO Worldwide LP (together with its divisions, partnerships, affiliates and subsidiaries, including any and all internal governance bodies, "ERCO") is committed to protecting the health and safety of its Representatives, customers, contractors and community, minimizing the impact of the operations of ERCO and seeking continuous improvement of its health, safety and environmental performance in all of its operations.

ERCO recognizes that providing healthy and safe working conditions and minimizing the impact of ERCO's operations on the environment is essential to its business success.

Definitions

In this Policy the following capitalized terms have the meanings set out below:

- "**Board**" means the board of directors of ERCO Worldwide LP.
- "**HSE Committee**" means the Health, Safety and Environment Committee of the Board.
- "**Policy**" means this health, safety & environment policy, as it may be amended from time to time.
- "**Representative**" means a director, officer, employee or independent contractor of ERCO. For certainty, independent contractor includes an individual acting as a consultant or performing other services for ERCO who is not a director, officer or employee.

Policy Principles

The following principles are fundamental to achieving ERCO's goals with respect to health, safety and the environment:

- a) to comply with and exceed where appropriate, all applicable health, safety and environmental laws and regulations and to conform to ERCO's internal standards;
- b) to promote a culture across the ERCO which has safety as a core value, aligns with the belief that all safety incidents are preventable and supports the ERCO vision to be an injury and accident free workplace;
- c) to communicate this Policy to all Representatives and promote active participation by Representatives in ERCO's health, safety and environment programs, recognizing that all Representatives are responsible and accountable for complying with this Policy;
- d) to reinforce that all Representatives in a leadership position have the responsibility to set an example and create a work climate that will motivate other Representatives to think



- and work safely;
- e) to assign health, safety and environmental responsibilities and accountabilities to each level of ERCO and hold Representatives accountable for the performance of their jobs in conformity with this Policy;
 - f) to effectively communicate information and instructions to Representatives, and to promote and maintain appropriate communications with external stakeholders affected by our operations, as appropriate;
 - g) to implement best industry practices, as appropriate;
 - h) to provide appropriate training and education to Representatives to establish annual goals, objectives and measure company and individual performance for each of ERCO's businesses;
 - i) to establish and maintain systems that will strive to identify and mitigate or eliminate potential risks to the safety and health of ERCO's Representatives, the public and the environment;
 - j) to implement systematic review programs for each of ERCO's businesses, to foster continuous improvement in health, safety and environmental matters;
 - k) ensure the participation of Representatives in the development of health, safety and environment programs and procedures associated with their activities;
 - l) to provide meaningful reports on health, safety and environmental matters to the HSE Committee on a quarterly basis;
 - m) to maintain an emergency management program that is compliant with regulatory requirements and designed to:
 - support our commitment to the safety of the public, Representatives, the environment and company property; and
 - utilize a systematic approach that supports planning, preparedness, responsiveness and mitigation.

ERCO is committed to providing the necessary resources to fully implement this Policy and achieve the foregoing principles.

Additional Policies and Procedures

Each ERCO site shall be required to develop and implement site specific health, safety, emergency preparedness and environmental policies, procedures, and action plans for their operations consistent with the principles in this Policy. ERCO shall monitor and consult each site regarding implementing such policies, procedures, and plans.

Scope

Each Representative is required to incorporate and abide by the principles (including spirit of the principles) set forth in this Policy in carrying out such Representative's responsibilities, as well as



all additional health, safety and environmental policies and procedures related to such Representative's respective business and role in the organization.

Communication and Enforcement

All Representatives will be advised of this Policy and its enforcement, as well as the importance of individual responsibility to achieve the goals set out in this Policy. As part of the acknowledgement process pursuant to ERCO's [Code of Conduct](#), each Representative will be asked to acknowledge that they understand, and are required to comply with, this Policy.

A Representative who violates this Policy may face disciplinary action up to and including termination of employment in the case of an employee, and, in the case of an independent contractor, termination of such Representative's contract with ERCO. Such disciplinary action is in addition to any other legal remedies that ERCO may pursue against a Representative. In addition, a violation of this Policy may also violate applicable laws and result in personal consequences, including fines, incarceration, and other penalties. If ERCO discovers that a Representative has violated such laws, it may refer the matter to the appropriate authorities.

Policy Revision

The HSE Committee will review and recommend to the Board revisions to this Policy from time to time to reflect changes in legal or regulatory obligations or leading practices. Any changes to this Policy must be approved by the Board. Any revised version of this Policy will be posted, and each Representative is encouraged to refer back to it on a regular basis.