

POL

Title: Environment, Health and Safety Policy

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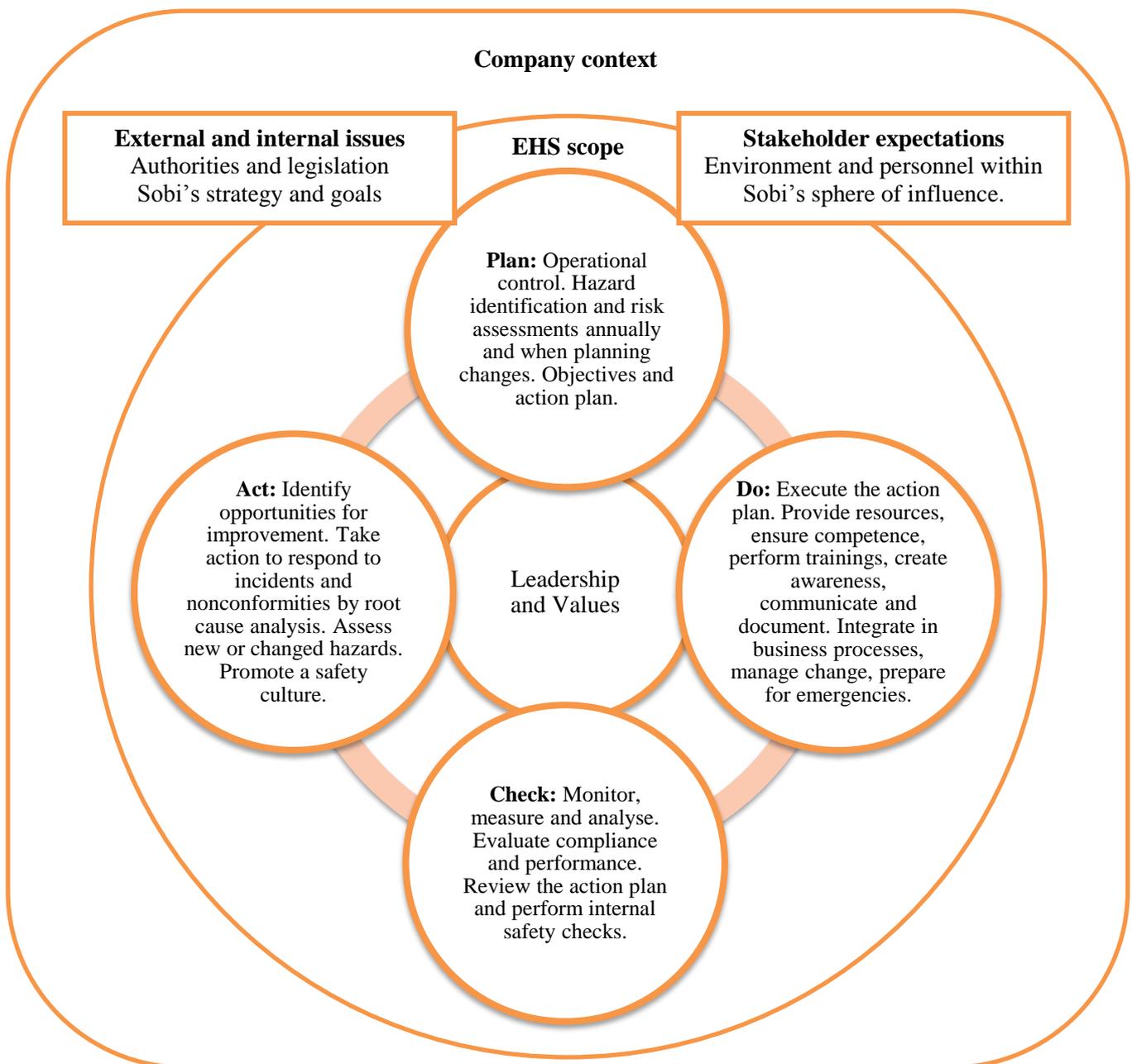
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1. PURPOSE

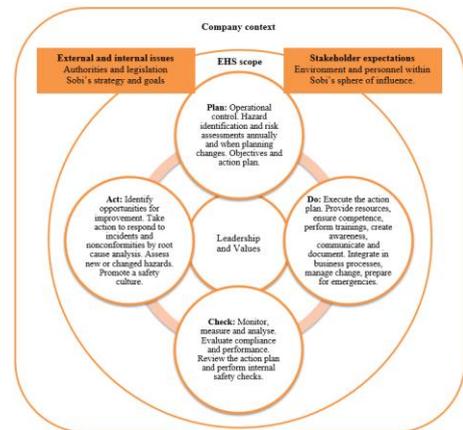
The policy complements the Sobi Code of Conduct and it states the basic principles and guidelines for managing Environment, Health and Safety (EHS) issues within all Sobi operations and its sphere of influence. The purpose of EHS management is creating a safe and healthy workplace, preventing adverse impact to the environment and saving natural resources, ensuring licence to operate and a sustainable business.

2. OVERVIEW



3. CONTEXT AND SCOPE

Taking environment, health and safety considerations is a prerequisite for achieving Sobi's vision and a foundation for Sobi's values. The responsibility extends throughout Sobi's sphere of influence. Managers, directors and other roles with operational control must understand how their activities influences the environment and the health and safety of employees, consultants, contractors, visitors, etcetera. They must take appropriate action to prevent any adverse environmental impacts, accidents or ill health and provide a safe and healthy workplace. Communication with internal and external stakeholders should always be transparent.

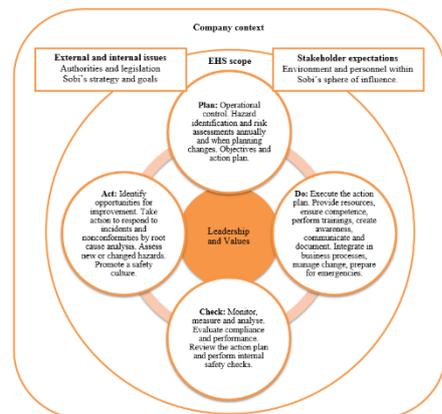


Compliance with applicable laws and regulations are required but is not enough. Relevant international standards, conventions, declarations and best available technologies and practices should also be considered and incorporated in company policies and guidelines when applicable. Managing environment, health and safety risks, both operational and reputational, is necessary to protect the business and a requirement for Sobi's license to operate. To seize opportunities and improve EHS management also has the potential to accelerate the business and create value, such as cost savings, branding and increased creativity and productivity.

4. LEADERSHIP

4.1. Operational Control and Management

The CEO has the main authority and responsibility regarding environment, health and safety management. EHS tasks and issues are a part of operations and authority and responsibility must be assigned, communicated and documented at all levels of operational control within Sobi. All managers, directors and other roles with operational control over personnel or activities that might affect health, safety and the environment must show leadership and commitment regarding EHS management.



Management at all levels must take overall responsibility for:

- the creation of a safe and healthy work place and the prevention of accidents
- the prevention or mitigation of adverse environmental impacts
- compliance with environment, health and safety legislation and Sobi's policies and guidelines
- EHS tasks within their area of operational control and ensure that they have the necessary competence and resources to fulfill them
- developing, leading and promoting a culture in the organisation that enhances EHS performance
- an open communication between management and employees
- protecting workers from blame when reporting incidents and risks

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4.2. Nonmanagerial Employees

Employees at all levels of the organisation must take responsibility for EHS issues over which they have control. Specific EHS tasks should be included in job descriptions.

All employees have a right/duty to:

- report near misses, dangerous situations and accidents to their employer
- follow safety instructions and use prescribed safety equipment and safety measures
- participate in risk assessments and the creation of a safe and healthy work place

It is the responsibility of everyone working on behalf of Sobi to acquire necessary training to be able to take environment, health and safety considerations in their daily work.

Appropriate actions to prevent accidents or illness must always be a priority.

5. PLAN

5.1. Risk Assessments

Hazard identification and EHS risk assessments must be performed annually and in case of planned changes. This can be done as part of the overall risk management process or any local risk assessment routine. Risk assessments must be documented. If there is not sufficient knowledge about a hazard the precautionary principle should be applied.

Examples of changes when EHS risk assessments can be applicable:

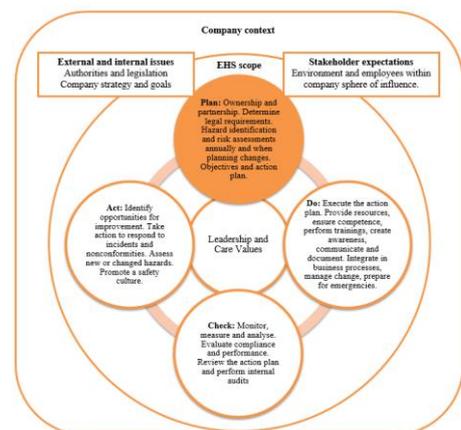
- Purchases, especially chemicals, travel, IT systems and energy consuming equipment
- Changes in production, other operations, organisation or work content
- Service, repairs and maintenance
- New business or termination of business
- Recruitment and workforce planning
- Pregnant employees

5.2. Action Plans

Results from risk assessments, previous surveys, inspections, safety checks, and experience from accident and near miss investigations are used to compile EHS action plans. Actions to leverage opportunities and enhance beneficial EHS impacts should also be considered and included in the action plan.

Some important actions to consider are:

- Written instructions and training for hazardous work
- Phase-out and avoid using hazardous chemicals and materials



- Technical and organisational measures before personal protective equipment
- Prevent pollution in preference to mitigating the impact
- Replace non-renewable resources with more sustainable alternatives
- Promote energy, water and materials efficiency

6. DO

6.1. Day to Day EHS Tasks

EHS management must be integrated in the business processes and operational control as an ordinary part of daily work. A holistic perspective that includes physical, mental, social and organizational viewpoints should be applied. EHS must be addressed regularly at meetings and any EHS aspects regarding planned activities considered. It is important that all employees are included and participate in the day to day EHS work. Managers, directors and other roles with operational control should always address any concerns raised.

6.2. Safety Instructions

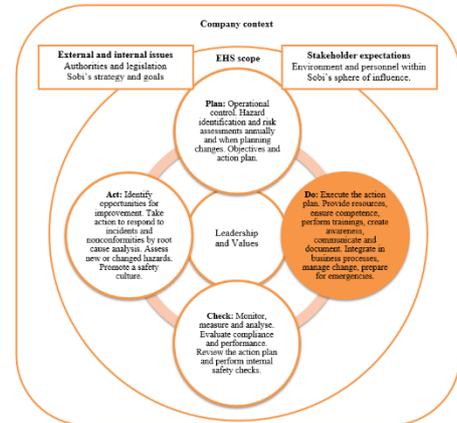
If there are risks related to certain work written safety instructions must be provided. These instructions must describe the preferred method of undertaking the task as well as precautions and requirements for reducing the risk. Until written instructions and trainings are in place this action must be included in the action plan and employees informed of the risk.

6.3. Training

Appropriate environment, health and safety training must be part of the employee-training program. Use results from risk assessments, previous surveys, inspections, safety checks and experience from accident and near miss investigations, to compile necessary training. Trainings can be included in the action plan and/or in employees' development plans. Required training must be included in introduction of new employees.

6.4. Emergency Preparedness

Risk assessments must result in the emergency preparedness that is required to quickly, accurately and efficiently manage any serious incidents and/or accidents and thereby limit the impact and consequence. Sufficient fire safety measures are a minimum requirement for all facilities.

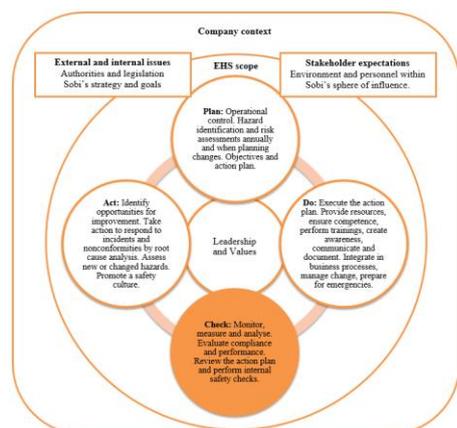


7. CHECK

7.1. Surveys and Inspection Tours

Surveys and/or inspection tours must be performed regularly for those areas where risks are found, for example:

- Safe driving
- Electrical safety



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- Ergonomics
 - Working postures
 - Ventilation
 - Noise
 - Lighting
- Home working/Teleworking
- Fire safety
- Hazardous chemicals and waste
- Organisational and social work environment, i.e. employee satisfaction survey
- Effects on the environment, greenhouse gas emissions, energy and water consumption, etcetera

All employees must be informed of any risks that are not sufficiently reduced immediately.

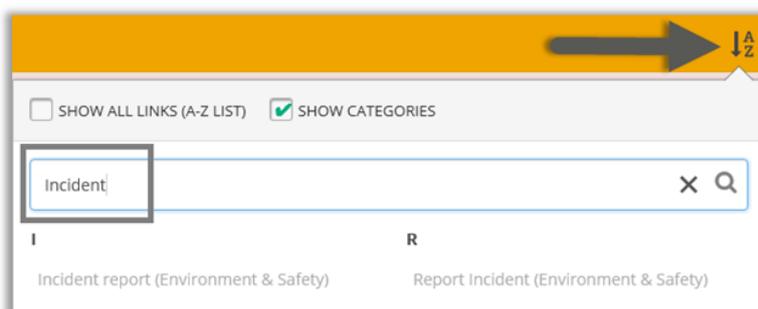
7.2. Review and Internal Audit

The action plan and EHS performance must be regularly reviewed and modified if necessary. Check that actions and measures have resulted in improvements. Surveys and inspections tours can be part of the internal audit program as well.

7.3. EHS Incident Reporting

The incidence and type of accidents, dangerous situations or near misses are important lagging EHS performance indicators. Investigating and identifying the cause(s) of an accident, dangerous situation or near miss makes it possible to take action to prevent a similar occurrence in the future. All employees are required to report EHS related incidents to their employer. The system for EHS incident reporting can be found at InsideSobi.

Information on Inside



Report via SERVEit



8. ACT

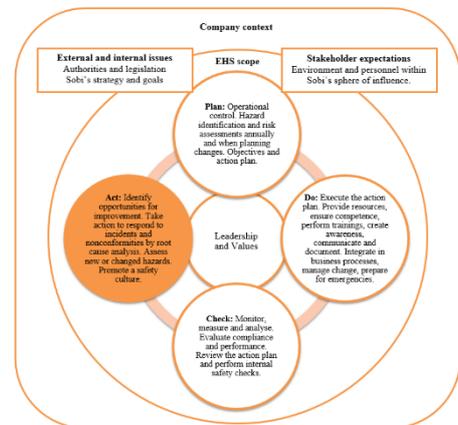
8.1. Root Cause Analysis

A root cause analysis should always be considered regarding reported incidents as well as nonconformities and repeated deficiencies discovered in surveys and inspections.

Investigating all the possible reasons for an incident or nonconformity by asking what happened, how it happened and why it happened, can provide important understanding of how to prevent it from happening again. A root cause analysis can identify multiple contributing factors, physical, human and organisational.

8.2. Continuous Improvement

If actions have led to the desired results it is time to stabilize the change to secure complete implementation and promote a culture that enhances EHS performance. For continuous improvement the plan-do-check-act steps are repeated.



9. SUPPORT

For further support and guidance go to Environment, Health and Safety pages at My Employment at InsideSobi.

10. REFERENCES

- 1) Environmental management systems ISO 14001:2015
- 2) Occupational health and safety management systems ISO 45001:2018