

Occupational Health and Safety Policy

Arlen S.A.

1. Introduction

Arlen S.A. undertakes to conduct its business in a manner that ensures safe and hygienic working conditions for all persons staying on the premises of the Company's plants and offices. The aim of the Policy is to prevent accidents at work, occupational diseases and near-misses, as well as to build a safety culture based on responsibility, risk awareness and continuous improvement. This Policy is part of the ESG management system and is linked to other internal documents of the Company, in particular, the **Human Rights Policy**, the **Anti-Mobbing and Anti-Discrimination Policy**, the **Diversity and Inclusion Policy**.

The Policy applies to all employees, members of management bodies, co-workers, suppliers, subcontractors and business partners of Arlen S.A., regardless of the form of cooperation and place of work.

2. Definitions

Occupational Health and Safety (OHS) – a system of organizational, technical and preventive activities aimed at protecting the life and health of employees and other persons staying on the Company's premises.

Occupational risk – the probability of occurrence of undesirable events related to the work performed, which may cause health or material losses; risk assessment includes the identification of hazards, risk assessment and selection of control measures.

Hazard – a potential source of injury or deterioration of health (e.g. moving parts of machinery, electricity, chemicals, noise, psychosocial burden).

Near miss – an undesirable event that did not cause injury or damage, but could have led to it.

Personal protective equipment (PPE) – equipment worn by the worker to protect against hazards (e.g. helmets, goggles, gloves, protective clothing, hearing and respiratory protection).

Particularly dangerous work – work that poses an increased risk of accident or health hazard (e.g. work at height, in confined spaces, work with electricity, hot work).

3. Occupational health and safety rules

3.1. Accountability and Legal Compliance

Arlen S.A. ensures compliance with applicable regulations and best health and safety practices. The Board of Directors and executives are responsible for establishing the requirements, resources, and oversight necessary to achieve safety objectives. All employees are responsible for complying with health and safety rules, reporting irregularities and actively participating in building a safety culture.

3.2. Hazard identification and risk assessment

The Company conducts systematic risk identification and occupational risk assessment for all positions and processes, and documents the results in risk registers. On this basis, it selects measures to eliminate or minimize risks in accordance with the hierarchy of controls (elimination, substitution, technical, organisational, PPE).

The risk assessment is updated in particular after technological or organisational changes, after an accident/near-missing, and periodically, as part of reviews of the OHS Policy and objectives. The results of the analyses are communicated to employees and taken into account in job instructions and training.

3.3. Safe workflow and instructions

Each work process has specific health and safety standards, including workplace instructions, lockout/tagout rules when switching off energy, rules for particularly dangerous work and cleaning requirements. Managers are required to enforce compliance with the instructions and to ensure that documentation is available and understandable at the workstations.

The instructions are subject to review and updates following changes in process, equipment or protection measures. Employees have the right and obligation to refuse to perform work in the event of a direct threat to life or health and to immediately notify their supervisor and the relevant internal services.

3.4. Collective and individual protective equipment (PPE)

In the first place, the company uses technical and organizational measures of collective protection (shields, fences, ventilation, signaling, blockades), and only when this is not enough – it provides appropriately selected and certified PPE. The selection of PPE results from a risk assessment and is documented.

Workers must use PPE as instructed, take care of their condition, and report wear and damage. The company provides training on the proper selection, use and maintenance of PPE and keeps records of the funds spent.

3.5. Events, accidents – reporting and investigations

All accidents, incidents, near-misses and dangerous conditions or behaviours are subject to prompt reporting through established channels. The Company conducts post-accident and post-registration investigations of causes (including root causes) and implements conclusions in the form of corrective and preventive actions.

3.6. Competencies, training and qualifications

Arlen S.A. provides initial, periodic and specialist OHS training adequate to the positions and risks (including particularly dangerous work, first aid, fire protection). Training is documented, and admission to work requires proven competencies and, when required, valid authorizations.

Managers are responsible for directing them to training, verifying competencies, and conducting on-the-job briefing after each process change. The development of competences is supported by awareness-raising activities in the areas of safety, diversity and inclusiveness.

3.7. Ergonomics, psychophysical health and well-being

The company strives to reduce ergonomic loads (forced positions, lifting, computer work) through proper organization of workstations, regeneration breaks and selection of tools. If necessary, rational improvements and adjustments to the position are introduced.

3.8. Subcontractors, visitors and supply chain

Contractors and guests are obliged to comply with the health and safety rules in force on the Company's premises. Before being allowed to work, subcontractors are trained in local requirements, risk assessment and dangerous work rules; The company requires them to have adequate competencies, PPE and insurance.

3.9. Emergency preparedness and fire protection

The company maintains crisis response plans, evacuation procedures, and appoints and trains internal services (first aid, evacuation, firefighting). We conduct regular exercises and inspections of equipment (fire extinguishers, hydrants, first aid kits), and we use the conclusions from the tests to improve procedures.

All alarms and events must be reported immediately to the appropriate internal services and, if necessary, to external institutions. Employees are obliged to obey the instructions of those in charge of the action.

3.10. Continuous improvement, audits and reviews

The OHS system is monitored through indicators (e.g. accident rate, completed corrective actions, audit results). We analyze the data with respect for confidentiality and information processing rules, and we implement the conclusions in the form of improvement plans.

The OHS policy and objectives are subject to regular reviews and updates, including annual reviews consistent with the practice used in other corporate policies of Arlen S.A.

3. Reporting violations

This Policy is a specification of the guidelines contained in **the Code of Ethics of Arlen S.A.**, therefore reporting potential violations is carried out according to the same principles. Notwithstanding the specific reporting channels under the Procedure, all reports and matters related to this Policy may be addressed:

- a) to a supervisor or a higher-level supervisor (in the case of reports made by employees or associates of ARLEN S.A.),
- b) directly to the **Ethics Ombudsman** (in any case) at: etyka@arlen.com.pl or the Office of the Management Board of Arlen S.A., 17 A. Branickiego Street, 02-972 Warsaw,
- c) In matters requiring legal interpretation, support is provided by **the Legal Department of Arlen S.A.** at prawny@arlen.com.pl or the Office of the Management Board of Arlen S.A., 17 A. Branickiego Street, 02-972 Warsaw.

4. Final provisions

This Policy enters into force on 1 October 2025 and is effective until it is repealed or replaced by a new document.

The Policy is subject to annual review and updating by the relevant organizational units of Arlen S.A., taking into account regulatory and organizational changes and best market practices.

The Management Board of Arlen S.A. together with the Company's subordinate organizational units, it is responsible for supervising the implementation and effectiveness of the application of the provisions of this Policy.