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Group Instruction regarding safety; Management requirements

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1. Background and purpose

The purpose of this Instruction is to determine the safety management principles at SSAB to ensure effective, systematic safety work that enables us to achieve our objective of zero accidents, injuries and work-related illnesses.

2. Applicability

This Instruction is mandatory and shall apply to all divisions and companies in the SSAB Group

3. Safety Management Requirements in SSAB

3.1 Safety management basics

Safety and wellbeing of our employees, sub-contractors and partners is considered a fundamental part of all management in SSAB worldwide. Working safely is a fundamental prerequisite for being employed at SSAB. Occupational safety is part of the integrated management system.

All our actions are based on promoting zero accident thinking. We aim to change people's attitudes and motivate them to continuously improve safety and actively contribute to everyone's wellbeing at work.

Everyone has the right to a healthy, accident free work environment in SSAB. Our goal is to prevent all injuries and work-related illnesses. We strive to minimise health and safety risks everywhere we operate.

We are committed to following these basics throughout the company:

- Safety gets first priority on the agenda of meetings at all organizational levels
- All accidents and incidents are reported and investigated. The supervisor must be notified of a lost time or a medical treatment injury within 24 hours of the occurrence
- Workplaces are well organised and standardised working methods are implemented.
- Everyone is involved in the safety improvement work
- Information related to health and safety is shared and communicated openly.

To strengthen everyone's commitment to safety, a safety pledge for SSAB has been introduced. In the pledge, all employees commit to work safely, look out for the safety of others, take action if one recognizes a hazard or a risky behaviour, and to always put safety ahead of production.

3.2 Roles and responsibilities

Line organisation has the overall responsibility for managing and developing safety, and ensuring compliance with all applicable legal and other safety requirements. Line management is co-operating with a network of safety specialists.

SSAB Group Executive Committee and **Division Management Teams** integrate safety into strategy and actions and set strategic targets for safety development. Ensuring sufficient resources for safety management SSAB Group Executive Committee and Division Management Teams enable continuous improvement of safety performance at SSAB.

Two cross-divisional safety groups, Safety Expert Group and Safety Council, ensure co-operation in safety on a group level. The Safety Council consists of senior management of operations from all SSAB divisions, as well as subsidiaries Tibnor and Ruukki Construction. The safety management team is the decision-making body on safety issues relevant for the company. The team is also responsible for promoting a positive safety culture within the company.

The main objective of the safety expert group is to share information on divisional safety programs, achieved results, best practices, information on serious incidents, and recommendations on preventive actions. The group also prepares company-wide safety initiatives to be decided by the safety management team.

All SSAB employees are responsible for ensuring their own safety and for that of others in their own working environment.

SSAB is also responsible for the safety of our subcontractors and visitors.

3.3 (Safe Job Procedures) safety Risk Assessments

The responsibility for carrying out risk assessments is on line organisation, supported by safety organisation and the employees of the evaluated areas.

All SSAB units and sites shall create and maintain processes, procedures and necessary tools to

- **identify systematically the safety hazards** arising from the work, working environment, machines and tools and working conditions,
- **assess regularly the risks** arising from the identified hazards,
- **plan and carry out corrective and preventive actions** to eliminate or minimize those risks and
- **maintain and update the risk assessment data at all times.**

Risk assessments cover all existing, new and modified systems, processes and operations
Results of risk assessments must be widely communicated to all internal and external employees who may need the information.

All risk assessments shall be documented. This documentation and all related data shall be maintained according to division / unit level procedures. Risk assessment documentation and data shall be available for review purposes at all times.

Risk assessments shall be reviewed and updated when necessary. Recommendation is to check risk assessments in every 3 years even though there has been no change in process or area.

3.4 Failure to comply with the safety rules and consequence management

Safety procedures are created to protect employees from the risk of injury or sickness. **The employer** must provide necessary protective equipment and work procedures. **Employees at all organizational levels** must comply with company safety procedures and report identified risks.

The purpose of the consequence management procedure is to describe how to act in the event of violation of safety procedures and instructions. Procedures apply to all employees regardless of work position.

Managers and supervisors make sure, through induction, training and supervision, that safety procedures and rules are followed at all times. Disciplinary action procedure applies to both SSAB employees, supervised external labour, and contractors.

The procedure has a safety-enhancing impact when it meets the following criteria:

- It is communicated to and known by everyone.
- It contains more than one step, so that no one is subject to disciplinary actions accidentally or due to a memory lapse.
- A gross breach of work safety (e.g. removing a protective device without supervisor's consent) leads directly to a more severe disciplinary actions.
- Actions taken are unbiased and identical irrespective of personnel group or unit.

3.5 Contractor and subcontractor safety

All SSAB units shall create and maintain procedures to ensure the safety of contractors and subcontractors working in areas controlled by SSAB. These procedures shall cover

- Safety issues during supplier selection
- Safety requirements in contracts
- Work supervision and responsibilities

- Minimum requirements for knowledge regarding safety
- Co-operation, safety level follow up and ways of communication during the course of the contract work
- Measures and reporting after completion of work
- Continuous improvement of client and supplier co-operation

Contractor is responsible for informing SSAB about all injuries and accidents that take place in SSAB premises and/or during work assigned by SSAB.

Contractors are classified in main groups, which determinates their safety assurance level as following:

INCLUDED in safety reporting

- Production, maintenance, safety and security suppliers. Typically, these have long-term agreement with SSAB e.g. external maintenance.
- 'Erection (service) suppliers' for investment projects, project business and maintenance actions.

EXCLUDED in safety reporting

- Raw materials or products transportation companies (outside our premises)
- Occasional contractors, which typically spend short time on site. E.g. maintenance of office equipment, work wear operators and suppliers of first aid equipment.

NB. Rental workers are reported as SSAB own employees

4. Safety terms and definitions

SSAB employee

SSAB employees and temporary and agency employees hired by the company and are supervised by SSAB.

Contractor employee

Contractor employees (contractor, sub-contractor, consultant or vendor) who are hired to provide a service to SSAB. The employees are supervised by the contractor and paid by the Contracting Company.

Visitor

Anyone on the company premises other than an employee or contractor. The company has the duty of care and direct safety supervision.

Hours worked

Includes all regular and overtime hours paid. Hours worked by hired workers should also be included. When theoretical worked hours are used, the formula is [The number of employees x 133,33 hours/month (1600 hours/year)].

Fatality

A fatal incident resulting from a work-related activity as determined by local legislation and guidelines.

Lost Time Injury (LTI)

Any work-related injury, resulting in the employee not being able to return to work for the next calendar day. Work related injury is a workplace injury that is the direct result of “work-related” activities an employee is engaged in at the time of the injury.

The incident causing the lost time must be sudden with external influence. If the injured person is treated by a paramedic or a physician after some time of the incident and receives documented work restrictions and is not able to return to work, that constitutes a lost time injury status. Returning to work with work restrictions does not constitute a lost time injury status. Lost Time Injury Frequency Rate (LTIFR) is calculated as number of Lost Time Injuries per million man-hours. All LTI’s must be communicated to the supervisor within a maximum of 24 hours of the incident.

High consequence LTI’s

Injuries from which the worker cannot recover (e.g., amputation of a limb), or does not or is not expected to recover fully to pre-injury health status within 6 months (e.g. fracture with complications)

Injury severity rate

The number of absence days due to lost time injuries (LTI’s) divided by the number of LTI’s as R12 months cumulative.

Medical treatment injury (MTI)

Any work-related injury other than a fatality, a Lost Time Injury, or a restricted work case, which is treated by a paramedic or a physician without loss of work time other than time of the shift on which it occurred, and the injured person continues with his normal scheduled work. All MTI’s must be communicated to the supervisor within a maximum of 24 hours of the incident

Alternate duty / Restricted work injury (RWI)

The employee received documented work restrictions from a professional licensed healthcare provider which will not allow the employee to perform all routine job functions. This is based on the next calendar day, not on the employee’s next scheduled shift.

Minor injury (MI)

Any work-related injury that does not require any treatment beyond first aid. No restrictions or lost time. The treatment is not required by a professional licensed healthcare provider

Commuting accident

An accident which results in death or personal injury and occurs on habitual route, in either direction, between workplace, other working place appointed by the employer or work-related training and the worker's principal residence (home) or secondary residence (e.g. a hotel during a business trip)

Safety observation

- *Unsafe act*
Any work related activity in which an employee deviates (unsafe act) from a standard practice which endangers him/herself and/or others. The act could also include potential damage to equipment and property.
- *Positive safety observation*
A positive, documented observation of a good practice or behaviour which promotes safety
- *Safety deviation /risk observation*
Any situation which sooner or later may lead to a risk of an incident inflicting harm to one or more persons. For example, a slippery surface.

Safety round

A round or a walk focusing on safety and risks. The findings of these tours must be documented and corrective and preventing actions to remove the observed risks must be planned and carried out. All walks are reported as one, i.e. one walk with 3 participants is one walk not 3 walks.

Safety moment / toolbox talk

A documented safety discussion for a team with a predefined topic or theme

Near miss and property damage

A Near Miss describes an incident where no personal injury was sustained and there may or may not have been damage to property, but where, given a slight shift in time or position, injury and/or damage easily could have occurred. If there was any property damage at all, incidents can be classified as property damages.

Potential serious incident or a near miss

Any incident other than fatality or LTI that has the potential to lead to life-threatening, life-altering or a fatal injury, includes at least the incidents involving moving machinery including lock-out, tag-out (LOTO), moving vehicles, cranes, falling objects, working at heights, failure in electric shocks and explosions. Units may use their own definitions if they are a required by the local authority.

Process safety incident

Process safety incident is an event where loss of containment has resulted in injury inside or outside the facility, property damage, community impact or release of hazardous substance or energy.

Major process safety incident

Major process safety incident is an event where loss of containment has resulted in at least one of the following:

- Injury resulting in a lost time injury, hospitalisation or a fatality inside or outside the facility
- Damage causing direct costs more than 1 M€ to the company
- Damage causing more than 10 M€ business impact
- Community impact: officially declared community evacuation, community shelter-in-place, or on-site shelter-in-place
- Significant release of hazardous substance or energy

Lost time injury frequency (LTIF)

$$\text{LTIF} = \frac{\text{Number of LTI's (pcs)}}{\text{Theoretical or actual work hours (h)}} \times 1\,000\,000$$

In SSAB LTIF is monitored as rolling 12 month cumulative figure LTIF. KPI targets are set for a calendar year.

Total recordable injury frequency (TRIF)

$$\text{TRIF} = \frac{\text{Number of reported LTI's + MTI's + RWI's (pcs)}}{\text{Theoretical or actual work hours (h)}} \times 1\,000\,000$$

In SSAB TRIF is monitored as rolling 12 month cumulative figure. KPI targets are set for calendar year.

5. Changes compared to last revision

This Instruction has been adjusted to SSAB's new structure for governing documents.