Global QHSE Policy

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Author: Global QHSE Dept.
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Confidentiality: Public

Before printing think about your responsibility for the ENVIRONMENT
<table>
<thead>
<tr>
<th>Date</th>
<th>Version</th>
<th>Author (Name)</th>
<th>Changes</th>
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<tbody>
<tr>
<td>29.02.2016</td>
<td>1.0</td>
<td>P.Stein, D.Huelemeyer, T.Juechter</td>
<td>First release</td>
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<tr>
<td>28.02.2017</td>
<td>1.1</td>
<td>T.Juechter</td>
<td>Added “Energy” as separate aspect; Change content about UNGC membership</td>
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<tr>
<td>09.03.2018</td>
<td>3.0</td>
<td>D.Huelemeyer, T.Juechter, S.Mathur</td>
<td>Added aspect “water” in 2.3; Added aspect “human trafficking” in 2.9</td>
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<td>08.01.2019</td>
<td>3.1</td>
<td>S.Mathur, D.Huelemeyer, T.Juechter</td>
<td>Added “Risk Minimization” in Policy Statement; Added Food safety policy in 2.10</td>
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<tr>
<td>20.03.2020</td>
<td>3.2</td>
<td>D.Huelemeyer</td>
<td>Other QHSE policies and manuals in 2.11 Update from OHSAS to ISO 45001</td>
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<tr>
<td>01.03.2021</td>
<td>3.3</td>
<td>S.Mathur, M.Rybak, D.Huelemeyer</td>
<td>Added CSR inputs in Section 1; Changed 2.3 Section heading and incorporated Air / Water quality inputs along with legal statement in the Health &amp; Safety section. Changed Section heading 2.3.1 Changed MSDS to SDS and Added legal inputs in Section 2.8 for Hazardous Material. Added Sustainability &amp; CSR inputs in Section 2.9 Added New Section 2.10 Carbon Footprint Management policy. Added New Section 3 Legal &amp; Compliance Requirements added.</td>
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Definition of Symbolic Directions in this policy

- A statement describing the minimum standard that must be complied with across Hellmann globally.
- A suggestion to be in line with ‘Best Practice Recommendations’ across Hellmann globally.
1. QHSE Policy statement / Purpose of this policy

Scope:
This Quality, Health & Safety, Environment and Energy (QHSE) policy applies to all our Hellmann owned entities, partners, agents and employees. In order to provide a safe and protected environment, all of our employees and further stakeholders are obliged to follow and actively comply with this global QHSE policy statement. The purpose of this policy is to improve our management systems and processes in order to combine those into one complete framework which enables us as an organization to work as a single unit with unified objectives (Integrated Management System).

We, at Hellmann, commit ourselves to:

- **Minimizing organization's risks** through our Integrated Management System by...
  - **Quality**: Identification, assessment and minimization of risks associated with operations and business processes.
  - **Health & Safety**: Identification, assessment and minimization of occupational health and safety risks.
  - **Environment**: Identification, assessment and minimization of environmental impact.
  - **Energy**: Identification, assessment and minimization of impact associated with sustainability & energy performance.
  - **CSR**: Understanding our positive and negative impacts on society and the environment and therefore, Prevent, Manage and Minimize any negative impact that may be caused through conduct of business operations, including within the organizational supply chain. Living up to this duty towards all stakeholders shall be a key essential.

- **Continuously improve** our Integrated Management System and...
  - **Quality**: Customer satisfaction and process standardization, documentation and performance.
  - **Health & Safety**: Occupational health and safety processes.
  - **Environment**: Environmental impact, sustainability and energy efficiency.
  - **Energy**: The energy specific performance.
  - **CSR**: Foster values directing conduct of responsible business through which we can build a more cohesive society and can ease the transition to a sustainable economic system.

- **The protection of**...
  - **Quality**: Customer goods, information and infrastructure.
  - **Health & Safety**: The Health & Safety of persons working at, within, or on Hellmann premises (including but not limited to: employees, visitors, contractors, etc.).
  - **Environment**: The environment in which we live and conduct business operations by reducing environmental impact on the biodiversity in and around facilities.
  - **CSR**: Human rights and local, national & international labor standards (e.g. International Labor Organization).

- **The prevention of**...
  - **Quality**: Nonconforming services.
  - **Health & Safety**: Work related incidents and ill health.

- **The reduction of**...
  - **Environment**: Pollution and damage to the natural environment including Air, Water, Natural Resources, etc.
  - **Energy**: Overall energy consumption affecting depletion of non-renewable energy sources.
• The **compliance with** all applicable national and international legal requirements as well as Hellmann policies and stakeholder requirements regarding all Quality, Health & Safety, Environmental and Energy related issues.

In order to keep this policy current and relevant, it will be reviewed on a regular basis and changed within the sole discretion of Hellmann.

This policy will be communicated to all internal and external parties by publishing it on Hellmann’s intranet (HINT) and website (www.hellmann.com).

The company management is committed to provide all necessary information and resources to achieve the strategic and operational objectives defined in the Integrated Management System available at global and specific country levels.
2. Attached Policies

QHSE and Corporate Social Responsibility (CSR) are not only essential elements of our everyday lives at Hellmann, but are also deeply rooted through our Corporate DNA - F.A.M.I.L.Y.

<table>
<thead>
<tr>
<th>First, People First</th>
<th>Health &amp; Safety Management (ISO 45001) &amp; CSR</th>
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<tbody>
<tr>
<td>All About The Customer, Always</td>
<td>Quality Management (ISO 9001)</td>
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<tr>
<td>Making It Work Better, Everyday</td>
<td>Through an integrated management system we revise and continuously improve our actions and processes of QHSE. This provides room for new and innovative ideas to perform business activities more efficiently and effectively.</td>
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<tr>
<td>Innovation and Entrepreneurship</td>
<td></td>
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<tr>
<td>Live Sustainability</td>
<td>Environmental (ISO 14001) &amp; Energy (ISO 50001) and CSR</td>
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<tr>
<td>You And Me</td>
<td>This policy does not only provide a guideline how to ensure the safety of each individual but also the effects of every action on the entire Hellmann Family.</td>
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2.1. Setting Global Minimum Standard Requirements

The policy elements listed in this chapter describe our global minimum QHSE standard requirements which are to be fulfilled by all Hellmann countries / branches / sites across global network operations, including all employees. All national (local) laws and regulations exceeding the contents of this policy must be followed by respective country / branch / site offices.

The minimum standard of this QHSE policy also defines the framework conditions for strategic and operational objectives. Local objectives shall be in line with this policy and specify the minimum standard with regards to local conditions.

2.2. Responsibilities

All Top Management (Global / Regional / Country) and the respective division heads are accountable and thus have to ensure that these standards and commitments are implemented, communicated, monitored and lived in the organization.
2.3. Workplace Safety & Employee Health And Welfare Policy

Purpose:

Given this multidisciplinary area of focus, all Hellmann operational sites must ensure the safety, health and welfare of all employees and protection of company’s property including our valued customer’s shipments at Hellmann operational sites / in transit.

2.3.1. Minimum requirements for all operational sites & office buildings:

**Quality**

As a freight forwarder we have the duty of caring for our customer’s goods for a specific time. To provide the appropriate environment for it, all goods have to be stored and managed appropriately with regards to:

- Temperature
- Moisture
- Light
- Stack ability
- Safety & security
- All other storage instructions (including customer specified, if any).

in our warehouses (applies also to third party warehouses).

**Health & Safety**

**Emergencies** such as chemical accidents, fire, etc. have to be avoided at all times. In order to act appropriately in case of an emergency, the following provisions have to be implemented:

- Clearly marked, visible and sufficient emergency exits
- Sufficient, maintained and easy to access fire extinguishers
- An appropriate and visible assembly area
- Evacuation/emergency drills to be conducted as per local law and requirements (with a minimum of at least once a year)

If no fire warden is nominated, the employees have to be trained on the use of fire extinguishers.

Appropriate break areas have to be provided to all employees. These have to be clean, separated from the working environment and sufficiently equipped. Moreover, an adequate number of functioning and clean restrooms with access to clean water have to be given in all warehouses and offices.

Fire is a significant hazard for all buildings and the health impacts of smoking have been proven to be negative. Therefore, all smoking laws must be followed per location, and smoking is strictly prohibited inside our offices and warehouse buildings. Smoking is allowed in designated smoking areas, as long as these are not inside our office or warehouse buildings.

All workplaces have to be well ventilated in order to protect the employee’s health, machines and equipment.

Good housekeeping is the first step for preventing incidents. To avoid tripping hazards, floors have to be free from objects at all times. Moreover, it is essential that all buildings are kept in a clean and safe condition.

To minimize work hazards, all employees must be trained on all relevant work hazards and QHSE procedures at least annually. For all new employees this should be part of the introduction training. Proof of yearly training per employee is required in the form of a written training record (e-learning record also applies).
Appropriate Personal Protection Equipment (PPE) has to be available, properly maintained, used and provided free of charge for all employees and visitors in potentially high risk work areas. In all warehouses in which we, at Hellmann, operate, safety shoes and high-visibility vests have to be worn at all times unless there is a written agreement in place that defines exceptions. In instances where national law or specific standard operating procedures require that additional equipment is needed, our employees also have to adhere to them. Those will also be provided by Hellmann. Further PPE are for example ear plugs, gloves, hard hats, safety glasses, etc.

An eye-wash station needs to be available to prevent injuries from hazardous fluids.

In the logistics industry, the risk of being hit by a vehicle is significant. Therefore, it is essential that walkways are in place. All our sites have to make walkways for pedestrians available and visibly mark them.

Air Quality in our work environment (inside or outside Hellmann facilities) directly affect workers’ comfort and also their health. Poor air quality (IAQ) has been tied to symptoms like headaches, fatigue, trouble concentrating, and irritation of the eyes, nose, throat and lungs. It is strongly recommended that data on the ambient air quality available from local authorities and other sources may be used to analyze and implement feasible counter measures towards having a healthy work environment.

With regards to Water Quality, local labor authorities in most countries in sync with ILO regulations, require employers to adhere to the following:

- All persons employed in a workplace must have access to “wholesome, cool drinking water” from a public main or other sources.
- Drinking water must not be located in rooms with sanitary conveniences.
- Any drinking water provided in a dispenser or container must be replaced daily and accessible via tap.
- Common drinking cups are not allowed for good hygiene and avoiding infection purpose.
- The employer is responsible for providing water drainage for spilled water.
- Drinking water must be provided on every level of the workplace where employees perform regular work.

Towards minimizing discomfort and risk of injury to employees when performing duties at work, all operational sites and offices must follow local regulations and legal guidelines.

Environment & Energy

If technical equipment, like printers or fork lifts, are not maintained on a regular basis, aside from health & safety, it can also be a serious risk to the environment and our ecological assessment. Due to this reason all branches have to inspect and maintain all of its technical equipment consistently. In case that these devices do not work properly, they must be repaired or replaced.

In order to save paper, it has to be ensured that duplex printing is used at all times and that unnecessary print-outs are avoided. In addition, only recycling paper should be used (FSC standard is suggested).

Insufficient lighting conditions may prevent people at work from seeing and reacting to possible hazards. For this reason all lights in work areas have to be at the minimum lighting value of

- 250 lux in warehouses
- 500 lux in office environments

In addition, the use of LED lights in all Hellmann owned warehouses and offices is strongly recommended.

We do not use any water in our regular logistics processes and therefore it is no significant environmental aspect. But it needs to be assured that water pollution is prevented during accidents by having effective processes for emergency preparedness.
2.4. First Aid Policy

Purpose:
The purpose of this policy is to safeguard employees by prevention from injuries and help injured to recover immediately after an accident happened.

Requirements:

In each branch appropriate first aid equipment as well as qualified persons are required. Therefore, an appropriate number of employees needs to be appointed and trained regularly.

Each first aid kit has to contain at least the following:

- Absorbent compress
- Adhesive plasters
- Bottle of antiseptic
- Cooling packs
- Elastic bandages
- Pair of plastic gloves
- Sterile pads

In the instances where national legislation prescribes additional items, the branch/site should follow the legislation.

It is a mandatory requirement that the first aid kit is properly re-stocked after use. Furthermore, at a minimum, the first aid kits should be inspected on a bi-annual basis to ensure that they are adequately stocked and not expired.
2.5. Substance Abuse Policy

Purpose:
Substances like alcohol or drugs can have an influence on an employee’s attendance and productivity. Further, the effects of intoxication or being under the influence of chemicals or alcohol in Hellmann’s work environment can pose an especially heightened safety risk to the employee as well as fellow workers.

Requirements:

Health & Safety
Serious safety and work issues may arise from drug and alcohol abuse which is why Hellmann has a zero tolerance policy. Therefore, employees are strictly prohibited from bringing or consuming drugs and alcohol on the company’s premises, during working hours or work-related events (held within working hours). Hellmann also strictly prohibits any employee from working under the influence or while intoxicated.

This also includes situations when employees are:

- Required to drive a private or company car for work related purposes
- On operational stand-by or on call
- Representing Hellmann at business functions
### Purpose:

This policy has the purpose of ensuring safe vehicle operation at the time of loading & unloading at Hellmann warehouses/sites during working hours. This also includes ensuring safe practices to be followed at the time of driving trucks, company cars, fork lifts and other work-related vehicles inside and outside Hellmann facilities. Importantly, this policy will also ensure that proper measures are taken to minimize security risk involving vehicles and people at work.

### Requirements:

<table>
<thead>
<tr>
<th><strong>Health &amp; Safety and Security</strong></th>
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<tbody>
<tr>
<td><strong>When driving</strong> a vehicle (forklift, truck, company car, etc.) in or outside the companies’ premises, drivers are instructed to <strong>wear a safety belt</strong> and appropriate, closed shoes at all times.</td>
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<tr>
<td><strong>Driving without a driver’s permit</strong> or after being disqualified is strictly prohibited. If the driver’s license has been suspended, they are instructed to report it immediately to their supervisor or Human Resources. Moreover, they need to be retrained.</td>
</tr>
<tr>
<td><strong>Identify guarded parking areas.</strong> Plan all halts, breaks and overnight stops in advance. In the event of an unscheduled halt – instruct drivers to keep all doors locked and secured, even when talking to people, in particular when transporting vulnerable loads.</td>
</tr>
<tr>
<td><strong>With regard to Road Safety, Security &amp; Driving, give clear and precise instructions.</strong> Document local / international requirements (as case may be) and make it available for ready reference to all concerned. More importantly, ensure these are well understood, accepted and complied by all responsible staff.</td>
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<tr>
<td><strong>Instruct drivers</strong> and if needed provide written en-route instructions (checklists, driver’s safety &amp; security guidelines etc.).</td>
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<tr>
<th><strong>Environment &amp; Energy</strong></th>
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<tr>
<td><strong>Every vehicle has to be inspected and maintained</strong> on a regular basis. This includes also checking the tire pressure which has a significant impact on the environment. Poorly maintained tires use more fuel, wear faster, and can also become a safety risk. Before the start of each shift, the employees do not only have to pre-inspect their vehicle but also to look at the maintenance log booking order to find out if any weaknesses of the vehicle to be used were mentioned.</td>
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<tr>
<td><strong>All Hellmann owned vehicles have to be driven fuel-efficiently and cautiously</strong> at all times as this not only minimizes the amount of fuel used but also increases road safety.</td>
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<td><strong>Fuel efficient</strong> vehicles with hybrid or electric drive shall be preferred over the use of conventional vehicles.</td>
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2.7. Waste Disposal Policy

**Purpose:**

This policy has the purpose of ensuring that waste is transported, handled and disposed of safely without negatively influencing people or the environment.

**Requirements:**

- **Environment & Energy**
  - Waste has to be stored in a manner that it does not create additional risks to the environment and/or the health of people.
  - It has to be ensured that recyclable waste is separated from non-recycling waste OR as regulated as per national or local law.

2.8. Hazardous Materials Policy

**Purpose:**

This policy has the purpose of safely storing, packaging and transporting hazardous materials to ensure that they do not leak or spill causing harm to the warehouses, workers or the environment.

**Requirements:**

- **Health & Safety**
  - All hazardous materials must be marked and clearly identified by internationally recognized symbols (GHS).
  - Safety Data Sheets (SDS) in the appropriate language have to be available for all employees in the warehouse (may not apply for cross-dock operations). Must ensure availability of SDS at physical location of the material also.
  - All employees who are working with hazardous materials have to be trained on appropriate SDS topics at least on an annual basis.
  - In addition to specific operational guidelines from global / regional / country product management, all operational sites handling Hazardous Material must ensure compliance of local laws and regulations pertaining to storage, transportation & handling requirements.

- **Environment & Energy**
  - All hazardous materials have to be appropriately stored in order to avoid environmental risks.
  - Spill kits have to be available in all buildings where hazardous materials are stored in case of emergency.
2.9. Sustainability & Corporate Social Responsibility Policy

Purpose:

Hellmann attaches great importance to a range of services that harmonizes the three pillars of sustainability: economy, ecology, and social issues. As we are also concerned with keeping future generations in mind, we assume responsibility for people, society, and the environment in all our business areas on a daily basis.

Corporate Social Responsibility lies at the heart of our corporate values in form of our Corporate DNA – F.A.M.I.L.Y. Hellmann Worldwide Logistics refers its orientation to the United Nations Global Compact (UNGC) and have made the ten universally accepted principles an integral part of our business strategy incorporated across all levels of our organization. The organization shall report its Sustainability & CSR initiatives and updates through its Annual Sustainability Report which will be available at Hellmann website (www.hellmann.com) to all internal and external stakeholders.

Requirements:

**Human Rights**

All branches have to support and respect the protection of internationally proclaimed human rights.

Hellmann prohibits any form of human trafficking and/or the support of related activities.

All countries in which Hellmann operates are encouraged to demonstrate their effort to improve the standards of life for their local communities through joint actions (e.g. environmental projects, volunteering program for employees, support of local schools/homeless shelters, etc.).

**Labor**

Compliance with all national laws and all occupational health and safety related aspects of this QHSE Policy.

Hellmann prohibits any form of forced, compulsory or child labor (not only in our facilities, but also those of our service providers).

All employees have to have the minimum employment age of 16 years OR as per respective local government laws/rules and regulations, if they are not exclusively employed for training purposes (e.g. apprentice, trainee, intern).

Hellmann does not discriminate nor does it tolerate any discrimination (or any other form of unfair treatment) in employment opportunities or practices on the basis of race, ancestry, color, religion, gender, sexual orientation, marital status, national origin, age, disability, citizenship, veteran status, military service obligation, or any other characteristics (all of which are considered “Prohibited Factors”) that would be in violation of human rights.

**Environment & Energy**

Compliance with all applicable national standards and all environmental and energy related aspects of this QHSE Policy.

In order to reduce the energy and environmental impact of our company the purchase of energy efficient products and services is strongly recommended. All purchase activities shall be in line with the respective policies.
2.10. Carbon Footprint Management Policy

We are determined towards increasing the organization’s energy supply security and reduce damage to the environment associated with energy waste and inefficiency. Hellmann’s commitment towards this goal is to contribute by making conscious efforts to reduce impact on the planet and tackle climate change through adopting a sustainable way of conducting its business operations.

Hellmann’s Carbon Emissions shall be reported according to Greenhouse Gas Protocol (ISO 14064).

All Hellmann countries to maintain and report energy consumption data on an annual basis.

2.11. Food Safety Policy

It is our obligation to take special care of all customer goods and products that are handed to Hellmann. This applies especially to food products, given they form a group of very sensitive goods.

We are obliged to identify and meet all individual product requirements, such as temperature specifications, to keep any sort of harm from the products. To guarantee this, HELLMANN WORLDWIDE LOGISTICS has established a comprehensive management-system that follows the ambitious IFS-Logistics standard; this standard implies that we solely work with well trained employees and carefully selected carriers or other transport providers.

Customer enthusiasm has always been our goal. If however, a deviation or nonconformance cannot be prevented, we will instantly inform our customers and put effective corrective actions in place.

3. Legal & Compliance Requirements

Fulfilling legal and compliance requirements are of utmost importance to the organization and all countries shall ensure the same are met without any compromise. In order to align the actions of all employees and to make sure that the necessary rules and regulations are followed, several policies are in place. The policies are listed under responsible departments and classified as policies being valid on a global / regional / local levels.

Available reference to following compliance guidelines and policies have been made available to all related parties. These can be accessed on HINT (Hellmann Intranet). Please see Link below.

https://hwl.sharepoint.com/sites/intranet-int-policies#compliance

4. Other QHSE related policies and manuals

Branch specific standards and certifications as well as specific customer requirements may request additional QHSE related policies or amendments to the existing policies.

If specific QHSE policies, manuals or amendments need to be established, it has to be declared with the Global QHSE department in order to ensure the alignment with the global integrated management system. In some cases the adjustment of the given policy and manual might be necessary.
## Terms and Definitions

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tr>
<td>Ill Health</td>
<td>It is an identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/or work-related situation.</td>
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<tr>
<td>Incident</td>
<td>It is a work-related event(s) in which an injury, ill health (regardless of severity) or fatality occurred, or could have occurred.</td>
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<td>Integrated Management System</td>
<td>An integrated management system (IMS) combines all of an organization’s systems and processes into one complete framework, enabling an organization to work as a single unit with unified objectives for easier management and operations.</td>
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<tr>
<td>People at work</td>
<td>All persons who are on Hellmann premises including employees, contractors, customers, visitors, etc.</td>
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<td>Risks</td>
<td>A probability or threat of damage, injury, liability, loss, or any other negative occurrence that is caused by external or internal vulnerabilities, and that may be avoided through preemptive action.</td>
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<tr>
<td>Stakeholder</td>
<td>Stakeholders are those with a vested interest in an organization’s achievements.</td>
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<tr>
<td>Vehicles</td>
<td>All work-related vehicles including company cars, forklifts, trucks, rented cars during work hours, etc.</td>
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<tr>
<td>Workplace</td>
<td>A Workplace is any physical location in which work-related activities are performed under the control of the organization.</td>
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