

Uponor safety guidelines

Health and safety of our employees are a management priority. At the same time, we expect our employees to adhere and contribute our occupational safety and health rules and goals in a manner that aligns with their responsibilities.

Our health and safety vision

A recognised industry leader in maintaining a safe and healthy work environment for all employees.

Our health and safety mission

Avoid accidents and sickness due to unhealthy working environment by raising employee awareness to ensure a constantly safe behavior. The health and safety of our employees must always take priority over economic considerations.

Our health and safety target

Our goal is zero accidents. We want to achieve this goal by continuously reducing our accident rate yearly by 20%, reaching zero latest by 2025.

Health and safety management

The daily management of health and safety topics is organised within each business divisions. Divisions' safety organisations are responsible for managing the health and safety topics and above mentioned principles with the support of local HR organisations. Local safety organisations are responsible for ensuring that Uponor's operations are compliant with local laws and regulations.

In addition, Group-wide safety network (representatives from Group and divisions) meet on regular basis to align processes and practices when needed.

Scope of these guidelines

All Uponor locations.

Our safety practices

1. Accident reporting and investigation

For the purposes of Uponor's safety practices and reporting, an "accident" is defined as any work-related accident (by definition accident, cause & effect, impact on health, no previous medical issue, work related, exceptions: specific cases like heart attack) resulting in temporary partial or total incapacity and which makes the injured person unable to work for a period of at least one day, excluding the day of the accident. A "near miss" is an event that does not result in injury, illness or damage, but which had the potential to do so.

Employees must report all accidents and near misses to the immediate supervisor immediately, but always by the end of the workshift.

In all cases, some degree of accident investigation or analysis will occur. The degree to which cases are investigated will be based on the severity (either actual or potential) of the case at hand and whether or not a comprehensive investigation would provide any value in preventing reoccurrences.

The primary purpose of an accident investigation is to identify root causal factors, so that they can be eliminated and reoccurrences can be prevented.

The following describes the process how Uponor Group's safety reporting for internal and external purposes is organised. In addition, there can be country-specific requirements in Uponor's operating countries, which are taken care of in local organisations of each division.

Accidents resulting in sick leave should be reported on timely manner, but latest within 48 hours of the accident, and at the same time take care of corrective measures to avoid further accidents of similar type.

All work related accidents should be reported to respective supervisor as well as to the safety organisation.

Every month divisions' safety responsible persons consolidate the site level information and report that to the Group's safety responsible. A discussion with Group's safety responsible and divisions' representatives about the accidents, which are counted in on Group reporting and which not, is taken place. A reason for eliminating some accidents from Group's reporting will be recorded in the meeting, to ensure transparency.

Exception of the rule: if a fatal accident occurs that needs to be reported to the Group Executive Committee and VP, Group Communications,

latest within 24 hours of the accident by the responsible division's President.

2. Emergency preparedness and response

Each facility shall identify the types of emergencies which are reasonably foreseeable and which are likely to have significant detrimental effect on the health and safety of employees or operations at that facility.

This listing shall reflect the types of natural disasters that are relevant to the facility, given its geographic location. Examples include:

- Fire/explosion
- Injury/illness
- Chemical spill or release
- Natural disasters
- Civil unrest
- Natural gas leak

Written emergency response plans shall be developed and communicated for each type of emergency identified. Appropriate training shall be provided to all employees who have responsibilities under the plan(s).

3. Hazard identification and control

A variety of tools shall be utilized to ensure that workplace hazards are identified, evaluated and controlled to the extent feasible.

The following methods are utilized to proactively identify the hazards faced by employees.

3.1 External safety and health audits. Audits by external organizations (i.e. insurance carriers) shall be utilized as a hazard recognition tool. Reports of all such activities are maintained and all resulting recommendations are reviewed, and implemented as deemed appropriate by Uponor.

3.2 Internal safety and health audits. A systematic procedure for developing, conducting, and documenting internal health and safety audits shall be developed and carried out.

3.3 New machine/process review. The hazards of new machines and processes shall be evaluated prior to implementation. Reports shall be documented.

3.4 New chemical acquisition. All new hazardous substances (chemicals) shall be evaluated for health and safety concerns, prior to implementation. Safety Data Sheets shall be acquired and made readily available to all relevant staff.

3.5 Work-related risk assessment. Different analysis methods may be used to evaluate the hazards of any job, but especially jobs with higher than average injury or illness rates.

3.6 Industrial hygiene monitoring. As necessary, industrial hygiene evaluations will be conducted to identify, evaluate and control workplace health hazards such as heat, noise, air quality, etc.

3.7 Employee hazard reporting and safety suggestions. All employees are required to report any hazards that they observe to EHS, or their lead or supervisor.

3.8 Historical data/Trend analysis. Records such as workers' compensation loss runs, OSHA logs, first reports of injury, etc. will be reviewed periodically to identify trends that represent ongoing hazards. EHS maintains relevant data and generates reports as requested or needed.

When appropriate, we will identify and track key metrics which not only measure performance and progress towards safety goals, but which also look forward to help us identify and analyze upcoming trends and occurrences.

When/if serious, recognized hazards are identified, they shall be controlled, to the extent feasible, using the following hierarchy of controls:

Preference	Type of control	Description
1	Elimination	The source of the hazard is completely removed or eliminated.
2	Substitution	A hazardous machine, chemical, etc. is substituted with one which is less hazardous.
3	Isolation	Employees are physically separated from hazards, either by distance or some type of barrier, enclosure or confinement.
4	Engineering controls	A machine, chemical, piece of equipment, etc. is modified to reduce its hazards.
5	Administrative controls	Hazards are controlled through some type of policy, procedure or rule.
6	Personal Protective Equipment (PPE)	<p>Employees are issued and required to wear protective equipment.</p> <p>Personal protective equipment Uponor provides its employees adequate personal protective equipment free of charge together with relevant training. Uponor requires that personal protective equipment requirements are clearly communicated to all employees working at Uponor's sites. Uponor's employees are required to wear relevant equipment when working at Uponor's sites.</p>

4. Training and education

Uponor ensures that its employees get needed safety training to their tasks.

All facilities shall develop a training plan which ensures that appropriate health and safety training is provided to all applicable employees. The specific content of training shall be appropriate for their specific roles, and the hazards associated with those roles.

All training will emphasize recognition of hazards that may be faced by employees, and how to avoid, eliminate, prevent and mitigate them.

At a minimum, training shall be provided at the time the employee is hired or otherwise assigned to a role for which a training requirement is established. Training shall be successfully completed prior to allowing the employee to work in the role for which the training is intended.

Follow up or refresher training will be provided when:

- There is a change in workplace operations or conditions which create a need for additional or new training;
- When the employee's responsibilities change;
- When there is reason to believe that the employee's knowledge or understanding is inadequate;
- When required by a local regulatory requirement.

All safety related trainings shall occur during normal working hours, without additional costs to employees or those costs should be compensated to employees.

Training shall be presented in a manner and form that is understandable to the employee. Accommodation must be made for employees who are hearing impaired, lack the ability to understand the language in which the training is presented, lack mental capacity, etc.

Training will always be provided by suitably qualified trainers.

All training will be adequately documented. At a minimum, training documentation shall always include:

- Full legal name and title of employees who successfully completed the training
- Date of training
- Name of trainer
- A brief description or outline of the material presented.

5. Employee engagement and participation

The following shall be implemented:

5.1 Safety committee. Joint labor/management safety committees are established at each location according to local legal requirements. The safety committees are established to provide a forum for employees of all levels to work cooperatively to improve health and safety conditions. Their role is to identify and evaluate hazards, and make recommendations to management to control them.

5.2 Safety suggestions and hazard reports. All employees are encouraged to submit suggestions to improve health and safety practices to management. Suggestions may be made directly to EHS verbally and/or in writing, and may be made anonymously.

All employees are required to report any hazards that they observe at the earliest possible time. Hazard reports may be made verbally and/or in writing, and may be made anonymously.

5.3 Employee input in training and program development.

Appropriate employees will be consulted in the development of safety initiatives and activities, such as the development of written programs, procedures, training, etc.

5.4 Participation in investigations. Appropriate employees will be asked to participate in investigations such as accident investigations, near-miss reviews, etc.

5.5 Injury/illness/accident reporting. Employees participate in the safety work by reporting injuries, illnesses, and accident, so that they

can be evaluated and have casual factors identified. Employees are to report all accidents to their immediate supervisor.

5.6 Hazard analysis. Input from employees will be solicited as part of the hazard identification and analysis process.

6. Employee health, wellness and industrial hygiene

Uponor provides safe and healthy working conditions for the prevention of work related injury and ill health. Every sites' risk assessment/work instructions should cover instructions how employees can be protected from air contaminants, radiation, noise, heat, biological agents (including bloodborne pathogens and COVID), and other such health hazards.

7. Safety rules and enforcement

Employees are expected at all times to conduct themselves in a positive manner so as to promote the best interest of the company. Violation of these conduct standards may subject an employee to disciplinary action up to and including termination.

Conduct Standards Include:

- Complying with all company policies and procedures
- Complying with all company safety and security regulations
- Wearing clothing appropriate for the work being performed
- Performing assigned tasks efficiently and in accord with established quality standards

8. Contractors working at Uponor's sites

Uponor expects all contractors working on Uponor's sites, or working at Uponor's behalf, to comply with all applicable health and safety regulatory requirements and Uponor's internal policies and procedures.

Appendix 1: Uponor's safety definitions

Accident	The standard definition of occupational accident contains the following elements: 1. fortuitous, sudden, or unexpected external event ; 2. during working hours/on the way to and back from the workplace; 3. arising out of work performed in the course and the scope of employment; 4. bodily harm; 5. causal link between the event and the harm.
Accident rate	Number of reported accidents resulting in sick leave >1 day/1.000.000 working hours. Formula: (No of accidents res. in sick-leave > 1 day / no of working hours) x 1.000.000
Accidents resulting in sick leave >1day	Any work-related accident (by definition accident, cause & effect, impact on health, no previous medical issue, work related, exceptions: specific cases like heart attack) resulting in temporary partial or total incapacity and which makes the injured person unable to work for a period of at least one day, excluding the day of the accident.
Hazard	Source or situation with a potential to cause injury and ill health.
Lost hours/Absence time	Number of days off resulting in sick leave > 1 day.
Lost time injury frequency rate	Accident rate (Lost time injury Frequency Rates -> LTIFR): Number of reported accidents resulting in sick leave >1 day/1.000.000 working hours. Formula: (Number of accidents res. in sick-leave > 1 day / number of working hours) x 1.000.000 Description: the number of lost time injuries occurring in a workplace per 1 million man-hours worked. An LTIFR of 8, for example, shows that 8 lost time injuries occur on a jobsite every 1 million man-hours worked.
Near Miss	A subset of accidents that could have resulted in injury, illness or property damage, if given a different set of circumstances, but didn't.

Severity rate	The severity rates total number of accident days lost x 1000 divided by total number of regular working hours and overtime worked during the period.
Working hours means	The total number of hours at work in the company. All personnel in the company shall be included. (production, marketing & sales, administration). 3rd parties and vacation should be not counted within the working time.

Appendix 2: Group requirements for accident reporting

Needed information:

- Name
- Date and type of an accident
- Location of the accident
- Type of the accident
- Detailed description of the accident
- Body parts involved
- Were normal/required safeguards and personal protective equipment (PPE) used at the time of accident?
- Did the accident result for sick leave? If so how many days?
- Additional comments