Group Health and Safety Policy

1 POLICY SCOPE AND APPLICATION

This Policy is globally valid and applies to all business units of Heras HoldCo AS ('the Group' or 'we'). The commitments, rules and procedures set out in this Policy covers all employees, non-employees and visitors involved in business activities within the Group. It is publicly disclosed, incorporated in the Group routines and clearly communicated internally and externally.

The Policy will be reviewed annually to ensure it remains relevant and effective. If the statements set out in this Policy conflicts with local laws and regulations, the law and regulations shall always go beforehand.

2 POLICY PURPOSE

The purpose of this Policy is to define the Group's commitment to a safe and healthy working environment. It aims to prevent accidents by minimising risks and create a workplace where health and safety is prioritised by identifying, managing, and continuously improving all our processes.

3 POLICY STATEMENT

It is the Policy of the Group to provide a work environment that promotes safety, health, and well-being for all employees. We shall:

- implement measures to prevent accidents, injuries, and health risks associated with physical work conditions,
- fostering an inclusive and supportive work environment that addresses mental health, reduces stress, and encourages open communication,
- regularly assessing and improving our work environment practices to align with best practices and regulatory standards, and
- encourage proactive engagement from all employees in matters concerning the work environment.

4 POLICY OBJECTIVES

- Ensure that our employees have access to the training and tools necessary to work safely and responsibly.
- Encourage proactive engagement from all employees in matters concerning the work environment.
- Regularly conduct work environment risk assessments to identify and address potential hazards in our operations.
- Prevent workplace accidents and illnesses by implementing a comprehensive risk management system for the work environment.
- Conduct regular policy reviews to ensure it remains relevant and effective.
- Ensure that we comply with all legal requirements.

5 OUR SYSTEMATIC APPROACH TO HEALTH AND SAFETY

We are committed to practicing health and safety management through a structured and proactive approach that ensures continuous improvement across all levels of the Group. In alignment with ISO 45001, all business units shall implement a process-based health and safety management system that emphasises risk-based thinking, stakeholder engagement, and data-driven decision-making. The health and safety work shall be anchored in clear objectives, regular performance evaluations, and corrective actions that foster learning and accountability.

5.1 Legal requirements

Each business unit shall implement a routine for managing legal requirements. This routine shall include at a minimum, but not limited to:

- one appointed responsible,
- description of how all statutory, regulatory and legal requirements identified, reviewed, managed and communicated,
- evaluation of all legal requirements and other requirements at minimum of every three years, and
- deviation of any legal requirements, which shall be corrected as soon as possible.

5.2 Risk assessment

Risk assessments are the foundation for a safe workplace, as the assessment proactive identify risks and hazards. We shall have a robust process for risk assessment with the

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objective to identify and address potential risks linked to health and safety in all our activities. The risk assessment includes, but not limited to:

- organisational- and operational changes,
- chemicals and biological hazards,
- psychosocial working environment, and
- violence and threats.

An overall risk assessment shall be conducted by all business units, at least annually.

Every employee shall be aware of the risks relevant to the work that has been assigned.

5.3 Accidents, near misses and risk observations

Reporting system for accidents, near misses and risk observations shall be implemented in each business unit. This system shall facilitate reporting, investigation (root cause analysis), action plan and follow up.

All business units shall report accidents with absence to the Group QHSE-team. It shall be reported in a document that include a description of the accident, the root cause and measures implemented.

All relevant incident reports shall be communicated to relevant employees with the purpose of knowledge sharing to prevent a similar accident to happen elsewhere.

All business units shall have a process in place for reporting to relevant authorities and customers.

5.4 Handling emergencies, including first aid

A Business Continuity Plan shall be implemented in all business units.

Our sites shall have an evacuation plan that is communicated to our employees and our visitors. Training on evacuation shall be conducted annually. Training in fire extinguishing shall be conducted in accordance with local laws and regulations.

Each business unit shall identify relevant personnel that shall conduct training in first aid and CPR in alignment with local law and regulations. The contact information of these employees shall be clearly communicated internally, ensuring all employees know who to contact in case of emergency. First aid kits

shall be provided and fully maintained where necessary, and the placement is clearly communicated.

5.5 5.5 Competence and training

We shall ensure our employees are provided the training necessary to work safely and responsibly. All employees shall be provided proper introduction, both theoretical and practical, to ensure safe working from day one.

Each business unit shall implement a training plan to ensure the employees have the theoretical and practical knowledge to conduct their work.

The key positions will be given training in the health and safety management system and relevant local regulations to improve the health and safety of the employees if found necessary.

5.6 Working Environment Committee

The business units shall implement a Working Environment Committee, which shall be described in an instruction. The instruction shall include, but are not limited to:

- members of the Committee and their positions, the members include representatives from employees and management,
- the Committee shall cover all employees in the business unit,
- frequency of meetings (bi-annually at a minimum), and
- written protocol, which shall be communicated to all employees covered by the Committee.

6 OUR APPROACH TO SPECIFIC RISKS

6.1 Safety and fire inspections

All business units shall implement an instruction for annual safety and fire inspections at all sites. The instructions shall include, but are not limited to:

- appointed responsible to conduct inspections, and
- a template to be filled out during the inspections, that includes a corrective action plan.

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6.2 Facilities and housekeeping

We shall provide suitable welfare facilities at our sites, these shall be regularly cleaned and maintained.

Working areas at our sites and in our customer projects, shall be maintained clean and safe as part of the employee's responsibilities. At customer premises we shall adhere to their policies and standards.

6.3 Medical checks

Medical checks shall be provided in accordance with local laws and regulations.

6.4 Stress management

We shall have a supportive and engaging work environment that fosters employee well-being and growth and minimise excessive stress. This shall include:

- Working methods that are designed to avoid excessive stress.
- All managers shall have enough knowledge to be able to recognize signs of stress and monitoring staff well-being.
- Employees are encouraged to report stress symptoms.
- The Company shall provide support and consider measures to address stress-related issues.

6.5 Personal Protective Equipment (PPE)

We shall not solely rely on PPE; other control measures shall be considered first. When PPE is necessary, it shall be ergonomically designed and meet relevant standards. The procurement of PPE shall consider the needs from employees and relevant procedures. Employees shall be trained in the use, storage, handling, and maintenance of PPE. Regular inspections of PPE shall be conducted to ensure its effectiveness.

6.6 Work equipment

Only trained and competent personnel shall operate work equipment. Equipment shall be suitable for the task and regularly inspected. Defective equipment shall be removed from use immediately. Users shall follow instructions and not modify equipment. Safety devices must be used and maintained properly.

6.7 Machine safety

All machinery must have appropriate safeguards in place and only authorised personnel shall operate these. Regular maintenance and inspections must be conducted. Employees shall report any defects or issues immediately.

6.8 CE-marking

We shall ensure written processes are in place for CE-marking in all machinery procured, sold and installed, both internally and externally. This shall be in place before the use of machinery.

6.9 Electrical safety

Only qualified and authorised personnel shall perform electrical installations or repairs.

6.10 Chemicals

Instruction for chemical management shall be implemented in each business unit. The instruction shall include, but is not limited to:

- risk assessment before use, to identify measures,
- necessary training,
- use of suitable PPE, and
- process of substituting hazard chemicals to avoid the use of hazardous substances where possible and selection of less hazardous alternatives.

All business units shall have a chemical system that at a minimum handle:

- list all chemicals,
- Store all Safety Data Sheet (SDS),
- performance risk assessments,
- support of the process of substitute hazard chemicals, and
- support the label handling when chemicals need to be poured into another packaging, and the labelling needs to follow.

6.11 Lone working

Lone working shall be minimised. If there is need for lone working, a risk assessment shall be conducted. The employees shall receive instructions based on the risk assessment. Methods shall be in place to communicate with lone workers.

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6.12   Alcohol and drugs

There are a zero-tolerance of being affected by alcohol or drugs at work. Prescription drugs that may impair performance must be reported to the immediate supervisor.

6.13   Smoking

All people who work or visiting our sites shall not be exposed to smoke. Therefore, smoking in all vehicles is prohibited, and where a property has rules regarding smoking, this shall be followed.

6.14   Contractors and hired personnel

The contractors and hired personnel shall be in line with our Health and Safety Policy. Therefore, this should be properly communicated, including their contribution to preventing accidents on our employees, themselves and third parties. As a minimum, the following shall be communicated:

- our Health & Safety Policy,
- the importance of reporting accidents, near misses and risk observation and how to do that,
- requirements on doing risk assessment before starting to work.

The person responsible for hiring a contractor or other personnel shall check that they have the right competence and certification for the work, before the contractor or hired personnel starts working.

7   MONITOR AND REPORTING

All business units shall have a process in place for reporting health and safety metrics to relevant internal and external stakeholders.

Health and Safety metrics shall be reported to the Board.

8   ROLES AND RESPONSIBILITIES

The Group executive management has the overall ownership and oversight of this Policy. The responsibility for the implementation of this Policy and the achievement of its objectives rests with the CEO.

The CEO is the document owner of this Policy and is responsible for maintaining and updating this Policy, as well as ensuring that it is properly published.

Each business unit CEO is responsible for defining roles with the right responsibilities, competence and mandate in their organisation. Further, they shall ensure Health and Safety is integrated in our daily work and all our processes. Lastly, they shall ensure that all employees within their area of responsibility are familiar with and comply with this Policy, including the communication and implementation.

All managers are responsible for facilitating a safe and healthy working environment for its employees.

All employees are responsible to follow this Policy and other local instructions, reporting risks, accidents and near misses as well as contributing to a safe and healthy work environment. All employees have authority to stop any work that is potentially harmful or conflicts with this policy. Employees are encouraged to ask questions and discuss compliance to this Policy with their managers and relevant support functions.

Appendix 1. Definitions

Employees include workers who are in an employment relationship with the Group (according to national law or practice)

Contractors and hired personnel are defined by individual contractors supplying labour to the Group, such as contractors, consultants, hired personnel, etc.

Accident with absence refers to an accident that is causing employees or non-employees to be absent from work for more than 8 hours.

Accident without absence refers to an accident that do not cause any absence from work.

Near misses refers to when an accident occurs, but no one is injured.

Risk observation refers to an identification of a risk, before anyone is injured.

Business units refers to the sub-entities of the Group.

Sites is a location/place of office, storage, retails, etc. controlled by the Group.