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1. Purpose

The purpose of this Health, Safety and Environment (HSE) Policy is to describe our principles and commitments for how Elkem shall govern its Health, Safety and Environment work. HSE involves the practical operational aspects of protecting the environment and maintaining employee's health and safety. This policy also covers Elkem's commitments within Environment, Social and Governance (ESG).

The HSE policy is anchored in Elkem's Governance policy.

Even though many of the Social and Governance topics related to HSE are included in this document, these topics are also addressed and elaborated on in other governing documents. These documents include but are not limited to Elkem's Code of conduct, Governance policy, Human Rights program, Anti-Corruption Compliance program, and the Code of Conduct for Elkem's business partners.

Key terms and abbreviations used in this policy are defined in section 6 below.

2. Scope

This HSE Policy applies to all employees, including temporary personnel, and directors in Elkem ASA and subsidiaries, corporate affiliates, and joint ventures that are majority owned or controlled by Elkem (individually and collectively), commonly referred to as "Elkem" or "Group".

Elkem's activities are organised in a business structure consisting of Divisions, Functions, and other units. Each Division is organised in plants, sales offices and other units reporting to the respective Division management. For the purposes of this policy, these organisational units will be commonly referred to as "Units". The same term will be used to refer to units organised in and / or reporting to a Function.

Local regulations shall prevail if their requirements are more stringent than the provisions in this Policy.

3. Risk management and materiality

All Elkem divisions and units, and other applicable legal entities, shall conduct an assessment to identify potential risks related to their HSE impact that occurs within the operation's area of influence and assess the materiality of these risks to the operation, environment and affected communities. This includes physical, transitional, and reputational risks and considers direct, indirect, and cumulative impacts. If production sites are expanded, new production methods result in major changes to the site, or material changes to the regulatory framework are implemented, a new assessment should be done. These risks should also be considered as part of the due diligence of mergers and acquisitions.

Many of the plants/sites within Elkem are highly hazardous and many of the activities have inherent risks that could lead to loss of life. It is for this reason that Elkem will adhere to the special requirements of local legislation related to Major Hazard installations as well as the requirements of the Life Saving Rules (LSR).

Within ESG, Elkem shall both identify issues which are impacting Elkem, and issues where Elkem is impacting the environment and its stakeholders (defined as double materiality). Elkem shall strive to reduce its negative impact and capitalise on opportunities that are identified.

4. HSE principles, objectives and commitments

HSE is, and will always be, a priority in Elkem's activities. Elkem strives to have a safe and healthy working environment and to be an environmentally conscious company. Our company's long-term success depends on ensuring that all activities are carried out in a way where we do not cause harm to people and limit the negative impact on the environment and its stakeholders.

4.1 HSE principles

Elkem shall operate in accordance with our five HSE principles:

1. **“Improvement has no limits”** defines the way we work encouraging employees to question current conditions and work continuously with improvements.
2. **“Zero harm philosophy”** promotes the idea that all incidents and injuries can be prevented and highlights our priorities. Incident and injury prevention are just as important as production, quality, sales, delivery times, efficiency, and cost control.
3. **“Focus on Hazard Identification, risk analysis, Action implementation through understanding and removing causes”** is about the importance of truly understanding the possible negative effects of our operations and to mitigate these with effective measures.
4. **“Resource Efficient processes”** highlights the importance of continuous improvement in our Environment/climate work to support the goal of minimizing the impact of our operations on the environment.
5. **“Active involvement”** highlights our human capital at all levels of the organisation as the most important prerequisite for success in our HSE work. The Human Organisational Principles (HOP) will be implemented across all of the sites to ensure that people are treated fairly and with the required dignity to enhance our HSE improvement processes.

4.2 The FORUS HSE system

FORUS is the HSE system utilised in Elkem today, and this system will be used for the improvement of HSE work in Elkem.

To operate in accordance with our HSE principles, Elkem is committed to:

- Allocating the appropriate amount resources to ensure that the risks are mitigated associated to individual health and safety.
- Proactively take steps to improve the health of our employees and the communities in which we operate.
- Setting ambitious goals and strive for continuous improvement in all aspects of health and safety.
- Prioritising individual health and safety when choices must be made within processes in the organization.
- Sharing best practice, learn from past events and implement systems to ensure that all employees have access to the best available information to allow continuous improvement.
- Using the same HSE systems, tools, and methods, and have the same expectations to HSE performance wherever we operate around the world.
- Ensuring that our sites are access controlled and all activities are protected from external attacks (physical and cyber)
- Ensuring that processes are in control and will not negatively affect the external environment or any of our stakeholders.

4.3 Life Saving Rules

The Life Saving Rules (LSR) are a set of rules drawn up by Elkem, based on industry best practice and learnings from our own organisation. The LSRs are design to prevent fatalities. Breach of LSR may lead to disciplinary actions.

- All non-procedural work requires a **Safe Job Analysis** and a **work permit**
- **Fall protection** to be used while working at heights
- **Cranes and lifting of loads** must be strictly controlled with work under suspended loads prohibited
- **Confined spaces** are identified, classified and marked. All risks must be mitigated before entry
- **Hot work** will be carried out by getting a hot work permit and by trained personnel
- **Energy isolation and Lock Out Tag Out** will be carried out on all types of energy and material movement sources before work is initiated
- By-Pass, Shut-Off or removal of **safety protection devices** without permission is prohibited
- Moving and rotating parts will be safeguarded according to the **AUTO principle**
- Approved **vehicles** and authorized drivers together with segregation of **pedestrians** and vehicles is required
- **Potential explosive or flammable conditions** will be identified and mitigated

5. Sustainability principles, objectives and commitments

Elkem is committed to promote sustainable operations and act as a responsible company throughout our value chain. Elkem strives to manage our operations with resource-efficient processes and in such a way that negative environmental impacts are minimized throughout the value chain. We are committed to comply with all applicable HSE laws and regulations and develop our business in accordance with the UN Sustainable Development Goals.

We shall:

- Strive for a sustainable use of natural resources and handling of waste and pollution, land use and biodiversity, and shall comply with all applicable legal and other requirements related to this.
- Work systematically to continuously improve our sustainability performance and our related working processes.
- Define objectives and targets for the main sustainability topics identified below and assure the availability of information and resources to meet these.

We will engage with relevant stakeholders and assume our societal and environmental responsibilities and strive to reinforce our leadership position.

5.1 Environment and climate

Elkem has defined emission reduction targets in line with the goals of the Paris Agreement, and Elkem is committed to reaching net zero emissions by 2050. These targets will be designed to mitigate climate change and limit global temperature rise. We will regularly assess our progress towards these targets and take necessary actions to achieve them. Elkem is committed to research and development of technologies and production methods that reduce the GHG emissions and the carbon footprint of our products.

5.2 Energy efficiency and renewable energy

Elkem will prioritise energy efficiency in our operations by implementing energy management systems, conducting regular energy audits, and investing in energy-efficient technologies. We will strive to reduce our energy intensity and associated carbon emissions. Elkem energy mix has a high share of renewable energy, and we will seek to increase this further.

5.3 Biodiversity stewardship and conservation

Elkem will actively work to conserve and enhance biodiversity in our operations. We will assess the potential impacts of our operations on biodiversity and implement measures to minimise negative effects. We will promote responsible land and water stewardship. Elkem sources wood, wood waste and other biocarbons (such as charcoal) and use this as chemical component in the production of silicon and silicon alloys. Elkem is committed to sustainable and ethical sourcing of biocarbon in accordance with international standards, and we are committed in our contribution to eliminate deforestation and the conversion of natural ecosystems, and to adhere to best practices for soils and peatlands.

5.4 Water and resource management

Elkem acknowledges that our operations are dependent on water and other natural resources. Elkem will actively manage our water usage and other natural resources. We will seek to reduce water consumption, implement water recycling systems, and adopt responsible water stewardship practices. Additionally, we will promote efficient use of other resources and explore innovative technologies to minimize resource consumption. Elkem is committed to prevent, minimise, and control pollution to water sources, fresh water and oceans, and land, and we will work to reduce our use and phase-out if feasible hazardous substances. Elkem is committed to reduce its water withdrawal and consumption.

5.5 Waste management

Elkem will implement comprehensive waste management practices that prioritise waste reduction, reuse, recycling, and responsible disposal and limit the waste sent to landfills to a minimum. We will minimise the generation of hazardous waste and promote safe handling and disposal of waste materials. We will actively seek opportunities for waste valorisation and explore circular economy approaches in waste management.

5.6 Circular economy

Elkem will strive to minimize waste generation and promote the principles of a circular economy. We will implement waste reduction and recycling programs, explore opportunities for resource recovery, and prioritise sustainable material sourcing. We will also consider the life cycle impacts of our products and aim for durability, reusability, and recyclability.

5.7 Supply chain management and stakeholder engagement

Elkem will collaborate with our suppliers and partners to promote sustainable practices throughout the supply chain. We will engage with suppliers to encourage GHG emissions reduction, responsible resource management, and ethical practices. We will also prioritise suppliers who demonstrate a commitment to sustainability. Sustainability performance shall be a criterion we consider when we design, invest and procure. Elkem will engage with employees, contractors, suppliers, shareholders, and other stakeholders to raise awareness about sustainability issues and encourage their participation in sustainable practices. We will foster an organisational culture that values environmental stewardship and provides opportunities for education and engagement.

6. Roles and responsibilities

6.1 General

Elkem will have clearly defined responsibilities for all employees and ensure that they accept accountability for HSE at all levels of the organization. This will be achieved by including HSE in all strategic processes, daily activities, and reporting. All employees will have the improvement of HSE as a defined target in their personal objectives and this will be managed through the normal company human resource processes.

Elkem's Group CEO has the overall responsibility for Elkem Group's HSE work.

The Corporate Leadership Team is responsible for providing the resources and commitment to ensure that the best possible foundation is in place for improvement of HSE globally.

The Board's Audit Committee has the overall responsibility for Elkem's HSE/ESG reporting, in line with best practice development.

ESG steering committee (ESG SC) has the overall responsibility to drive and monitor improvement activities related to sustainability.

Elkem Unit General Managers/Plant Managers have a special responsibility as the head of the legal entities. They will ensure that their Unit/Plant are managed in a legally compliant method, and in line with the principles and commitments set out in this this policy and supporting procedures.

All Elkem employees are responsible for adhering to the principles and commitments set out in this this policy, promoting compliant and sustainable business practices which are integrated in Elkem's operations.

Elkem has a process owner structure to facilitate and coordinate the HSE/ESG work in corporate support functions in the line organisation.

6.2 Policy implementation responsibilities:

- **Policy owner** is responsible for designing appropriate internal controls and necessary procedures to ensure compliance with the requirements set out in this policy.
- **Unit managers** are responsible for implementing the requirements set out in this policy and associated procedures.

6.3 Policy monitoring responsibilities:

- **Unit managers** are responsible for monitoring compliance with relevant procedures.
- Corporate Internal Control are responsible for
 - Preparing an annual internal control report to policy owners and corporate management
 - Distributing the annual internal controls report to the respective policy owners and recommending corrective actions to close identified weaknesses / gaps

6.4 Policy correction and reporting activities

- Policy owner shall
 - Review the annual report from the internal control function and take action deemed necessary to ensure that any identified areas of non-compliance are satisfactorily addressed.
 - Ensure continuous improvement of policy and related procedures based on identified weaknesses / gaps.
 - Instruct unit managers to implement corrective actions based on documented deviations.
 - Verify that corrective actions are implemented and report back to Corporate Internal Control
- **Unit managers** are responsible for implementing corrective actions as prescribed by the policy owner.

7. Definitions and abbreviations

Acronyms/Definitions	Description
LSR	Life Saving Rules A set of rules drawn up by Elkem, based on industry best practice and learnings from our own organisation. At Elkem they are maintained through corporate standards.
HOP	Human Organisational Principles
ESG	Environment, Social and Governance Categorisation of sustainability-related topics.
HSE	Health, Safety, and Environment Used as a general term for activities related to Health (working environment and health impacts of this), Safety (prevention of harm to people and / or things, as well as reduction of harm when incidents occur), and Environment (external environment and impacts of our activities on this, both locally and globally).
Double materiality	Elkem shall both identify issues which are impacting Elkem, and issues where Elkem is impacting the environment and its stakeholders
Major hazard installations	Plants and facilities where more than the prescribed quantity of hazardous substances are stored and/or used (e.g., explosive, flammable, oxidising, corrosive, acute toxicity, hazardous to the environment or health hazard, etc.)
GHG emissions	Greenhouse gas emissions
Paris agreement	The Paris Agreement (French: Accord de Paris), often referred to as the Paris Accords or the Paris Climate Accords, is an international treaty on climate change. Adopted in 2015, the agreement covers climate change mitigation, adaptation, and finance. The Paris Agreement's long-term temperature goal is to keep the rise in mean global temperature to well below 2 °C (3.6 °F) above pre-industrial levels, and preferably limit the increase to 1.5 °C (2.7 °F), recognizing that this would substantially reduce the effects of climate change. Emissions should be reduced as soon as possible and reach net-zero by the middle of the 21st century.
HSE resource	Professionals who are employed or hired to coordinate and ensure the quality of the Units HSE work, and / or employees representatives elected to contribute to HSE work
FORUS	Elkem's principal management system for Health, Safety and Environment (HSE). FORUS includes structure for HSE work, overall requirements (corporate standards), and tools for training and follow-up as well as an assessment tool.

8. Deviation handling and approval

Anyone applying for a deviation from this policy must obtain written approval from the document owner before the change / activity is implemented.

The document owner is responsible for maintaining appropriate documentation of approved policy deviations.

9. References

Document number	Document name/description
GRP-GOV-COC-00	Code of conduct
GRP-GOV-POL-00	Governance policy
ECM-HSE-ST-040 HSE	HSE Standard
GRP-CPL-POL-00	Compliance policy
GRP-CPL-PRO-02	Human rights program
GRP-CPL-PRO-10-01	Code of conduct for Elkem's business partners

10. Policy maintenance

To ensure that its content remains current and relevant, this policy will be subject to the following maintenance activities:

- The policy owner is responsible for reviewing the content of this policy, making any necessary amendments, and capturing feedback from individuals deemed relevant by the policy owner.
- The policy owner must review the content on an at least annual basis, but amendments can be made at any time.
- The policy owner will circulate the amended policy to the Compliance Committee for approval.
- The Compliance Committee will review and (re-)approve the policy on an at least annual basis, but can also approve amendments on an interim basis, as they occur.
- Attachments to this policy may be approved by the policy owner, without the need for formal re-approval of the policy.

11. Revision log

Rev nr	Date	Changes	Changed by	Approved by
R02	01.04.2024	Full review. Restructured document and added references to FORUS. Content on ESG has been transferred from the previous GRP-HSE-POL-01 Sustainability (ESG) policy, which is now voided.	Johan van der Westhuizen, VP HSE	Compliance Committee
R01	20.06.2022	First release	Siri Simenstad / Benjamin Westby	Compliance Committee