



# Group Health and Safety Policy

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## DS Smith Group Health and Safety Policy

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### 1. Introduction

We are committed to providing safe and healthy working conditions for the prevention of work-related injury and ill health to ensure that our people work in an environment where they, our contractors, site visitors and the public are safe and healthy.

We believe everyone who comes to work in our workplaces should go home healthy and safe. Aspiring to Zero Harm means we are expanding our vision and efforts to include focus on all accidents, incidents and importantly, the health and well-being of our people.

To do this, we will continuously strive to maintain and develop our processes and systems in accordance with our values. We will set objectives and require all parts of the business to establish health and safety action plans and regularly review their progress.

We believe that nothing is so important that it cannot be done safely and that a safe workplace is the cornerstone of a sustainable, profitable business. Our aim is to provide a culture where health and safety are an integral part of our business activities and where we strive to ensure people are not harmed.

### 2. Purpose and scope

The purpose of this policy is to set out our statement of intent, responsibilities, and arrangements with regards to health and safety. This policy is applicable to the entire DS Smith Group and its dealings with third parties, such as visitors, contractors, and other interested parties.

### 3. Statement of intent

We are committed to complying with all legal requirements in all jurisdictions where we operate. Where we set internal standards which exceed local legal requirements then we shall comply with the higher standard. This includes relevant international standards, voluntary programmes and/or collective agreements relating to health and safety, where applicable.

### 4. Roles and responsibilities

The Board of Directors of DS Smith Plc is responsible for establishing and supporting the Group's commitment to Health and Safety in accordance with this Policy and for monitoring the performance of the Group with respect to its implementation.

The Chief Executive Officer is responsible for adequately resourcing the implementation and overall management of the health and safety system to ensure the commitments made in this Policy are being met.



The Group Health, Safety, Environment and Sustainability Committee meets monthly to oversee the management processes, targets and strategies designed to manage health and safety and environmental and sustainability risks and opportunities, including reviewing performance on climate-related issues and the Group's health and safety and environmental and sustainability responsibilities and commitments.

The Managing Director of each business unit is responsible for the identification of risks associated with their business unit's functions and ensuring safety procedures and practices are developed and implemented commensurate to the level of risk posed by their operations and in line with this policy. Procedures will be regularly audited and tested.

Line Managers and Team Leaders are responsible for ensuring that their teams are aware of, and comply with, all health and safety requirements on a day-to-day basis and for reporting accidents, incidents, and dangerous occurrences.

Employees are responsible for ensuring they do everything practicable to prevent injury to themselves, colleagues and others affected by their actions at work. They must follow DS Smith's health and safety procedures and rules, report any incidents which may have led to injury or damage (known as 'near misses'), and advise their supervisors of any danger or work hazard immediately.

All staff collectively share responsibility for ensuring the workplace is a safe and a healthy place to work. DS Smith encourages any initiatives undertaken by employees, which ultimately lead to improved working conditions. Initiatives should be forwarded to the site manager for discussion with the management team or site Health and Safety Committee.

## 5. Arrangements

### Our Health, Safety and Well-being strategy

Our "VisionZero" aims to provide a working environment and culture where health and safety is integral to our business and all our people actively engage in our drive to continuous health and safety excellence. VisionZero is the framework under which we set objectives.

VisionZero focuses on developing four areas.

**Leadership** is a key element to deliver our health and safety strategy. Leaders have the power to be role models and influence those around them and make a positive impact on attitudes, behaviours, and the overall performance of an organisation.

**Engagement.** We aim at providing a clear understanding of the organisation's VisionZero and objectives to facilitate and improve every person's personal investment and commitment to achieve our goals.



**Culture.** We place the highest level of importance to share our VisionZero, our safety values, attitudes, and beliefs to actively promote a common understanding and way of working across DS Smith.

**Processes and working environment** protect our employees and any visitor to our businesses by providing a safe workplace and clear work instructions and practices that prevent accidents.

### Metrics and targets used to monitor health and safety

We believe all employees contribute to a safe working environment and culture and our focus is on individual ownership. As such we track and monitor both leading and lagging Key Performance Indicators.

#### Leading KPI

H&S Engagement Index (HS Eng.) reflects the participation rate of employees in risk identification and control activities.

$$H\&S\ Engagement\ Index\ (HS\ Eng) = \frac{Number\ of\ reported\ Safety\ Observations\ and\ Near\ Misses}{Headcount}$$

#### Lagging KPI

The Accident Frequency Rate (AFR) is the number of lost time accidents (LTAs) per million hours worked.

$$Accident\ frequency\ rate\ (AFR) = \frac{Number\ of\ lost\ time\ accidents}{1'000,000\ hours\ worked}$$

Health and safety targets are reviewed and approved on an annual basis. As we strive to achieve our VisionZero the accident frequency rate (AFR) target is reduced every year.

The health and safety targets we have set as part of our Now & Next Sustainability Strategy are:

- Reduce the Accident Frequency Rate (AFR) every year
- Strive to achieve Vision Zero



These targets are cascaded down to the site-level and all sites are required to establish health and safety action plans and to regularly review their health and safety performance.

In event of deviations with DS Smith's own procedures and definitions, every affected site will have to adhere to, and report work related accidents to local authorities according to the legal definitions used in the jurisdiction they operate in.

Health and Safety metrics and their performance are reviewed internally each month, and those disclosed externally are reviewed as part of our report review process annually.

We disclose performance in relation to these targets annually in DS Smith Annual Report and DS Smith Sustainability Report.

### **Procedures, management standards and management systems**

We continuously strive to maintain and develop our processes and systems in accordance with our values. As such we develop and implement safe operating procedures, management standards and a management system that identify risks, establish good and safe working practices, and ensure consistency.

Our management system includes, but is not limited to:

1. Procedures to report and investigate work-related injuries, ill health, disease, or incidents, including escalation of severe incidents to the board of directors.
2. Group minimum health and safety (GHS) standards to identify and control our main risk factors, such as:
  - GHS-001: Lock Out, Tag Out, Try Out
  - GHS-002: Work at heights
  - GHS-003: Workplace Transport
  - GHS-004: Machinery Guarding Principles
  - GHS-005: Control of Contractors
  - GHS-006: HSE Committees
  - GHS-007: HSE Induction training
  - GHS-008: Manual Handling Operations
  - GHS-009: Electrical Safety
  - GHS-010: Chemical HSE
  - GHS-011: Lifting Equipment Operations
  - GHS-012: Prevention of Spills
  - GHS-013: CCTV for Health and Safety

Our GHS serve as guidance on minimum requirements and expectations that operations across DS Smith should transpose into local safe operating procedures and work instructions.



## **Audit and independent verification**

Compliance with our GHS as well as the continuous improvement of the health and safety management system is driven through internal health and safety audit and third-party verification program.

The internal health and safety audit program focuses on the effectiveness of local safe operating procedures, instructions, and work practices to identify and control their risks. In addition, this program reviews the fulfilment of the minimum requirements outlined in the GHS.

Independent external verifications are planned based on legal requirements and type of operations. As such the scope and frequency of the third-party verifications may vary, but they will typically include, but not limited to:

- Fire protection and life safety codes,
- Lifting and electrical equipment,
- Machine guarding,
- Equipment related to working at heights,
- Management standards (e.g., ISO 45,001).

## **Risk and hazard assessments**

We strive to continuously identify better and safer work practices through a risk assessment approach. Our commitment is to evaluate hazards and eliminate or minimize their risk by implementing effective control measures.

Our risk assessment is not only limited to our operations under normal conditions, but we equally focus on our preparedness for emergency situations by developing emergency plans (e.g., fire, flooding, earthquakes) as well as business continuity plans to minimize the effect of these adverse events on our employees and customers.

## **Training, stakeholder engagement, awareness raising and communication**

### H&S Training

Health and safety training provides our employees with the skills and knowledge they need to do their jobs safely. As such it protects them, their colleagues, and our business. Furthermore, we believe that health and safety training unite us in the pursuit of a common Vision - to create a safe workplace that ensures the safety and success of everyone involved.

Health and safety training needs are defined based on our risk assessments and following the engagement with employees and, where applicable, employee representatives.

### H&S Engagement

Our H&S Engagement programs encourage the active participation of employees in risk identification and mitigation activities. Not only do we facilitate their participation, but we listen and act upon their issues and ideas.



Furthermore, we require our local management teams to handle unsafe situations directly and we expect that any concerns are listened to and dealt with appropriately.

#### H&S awareness

Compliance with health and safety guidelines is included in our job descriptions and contractual agreements. Our health & safety criteria, operating guidelines and minimum standards are included in our approach to procurement and form part of our contractual requirements with our suppliers. In addition, health and safety requirements are provided and explained to every visitor to a DS Smith site.

#### H&S communication

Health and safety communications provide meaningful, relevant, and accurate information, in clear and understandable terms, to our stakeholders, promote awareness and understanding of the management of health and safety as well as specific risk issues.

## 6. Key Related Documents

The following related documents can be found on the Plexus (intranet) Health and Safety pages:

- Group Minimum H&S Standards
- Guidance Documents
- Health and Safety Statement
- Incident Alerts
- Minimum Standard Resources Guidance
- Protocols - EWC
- Vision Zero Site Essentials
- Speak Up

## 7. Document Change Record

Version:	Date:	Change Description:	Author:	Approver:
1	26/05/23	Group H&S Policy	O. Bradley / M. Maguina	Iain Simm