



Metair Group SHE Policy

March 2025

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1. Introduction

All subsidiaries of Metair Investments Limited ("the company, Metair, or the group") is committed to providing and maintaining a safe, healthy, and environmentally responsible workplace for all employees, contractors, visitors, and users of Metair products.

We recognize our duty to minimize the environmental and safety impact of our activities, products, and services while ensuring compliance requirements are adhered to. Metair endeavours to ensure all our subsidiaries have detailed policy manuals and aim to be accredited by ISO14001 and/or OHSAS 18001. Our leadership and workforce are accountable for implementing, maintaining, and continually improving occupational health, safety, and environmental (SHE) performance.

All subsidiaries must adhere to this policy and develop site-specific SHE frameworks aligned with this group-wide policy. Compliance with SHE laws and standards are a core element of Metair's Code of Ethics and is integrated into our corporate governance structures.

2. Purpose

The purpose of this policy is to establish a structured framework for ensuring the health, safety, and environmental responsibility of Metair Investments Limited ("Metair") and all subsidiaries. This policy outlines the company's commitment to occupational health & safety (OH&S) and environmental sustainability while aligning with national regulations, and industry best practices, where relevant.

This policy aims to:

- Establish clear roles, responsibilities, and accountability for SHE management;
- Define health, safety, and environmental risk management principles;
- Ensure compliance with legal requirements and alignment to voluntary SHE standards;
- Promote continuous improvement and a proactive safety culture; and
- Align all subsidiaries, contractors, and suppliers with Metair's SHE commitments.

3. Scope

This policy applies to all Metair subsidiaries, business units, employees, contractors, suppliers, and visitors operating within all the company's divisions. The scope includes:

- All workplaces, facilities, and operations managed by Metair;
 - Employees, contractors, and supply chain partners engaged in company operations;
 - Environmental, health, and safety responsibilities for internal and external stakeholders; and
 - Compliance with national SHE laws, where relevant.
- This policy extends to all subsidiaries and mandates that each subsidiary implement site-specific SHE procedures that align with this overarching framework.

4. Glossary/ Definitions

CAPA – Corrective and Preventive Actions

CEO – Chief Executive Officer

COID Act – Compensation for Occupational Injuries and Diseases Act

ERP – Emergency Response Plan

HIRA – Hazard Identification and Risk Assessment

ISO – International Organization for Standardization

LTIFR – Lost Time Injury Frequency Rate

OH&S – Occupational Health and Safety

OHS Act – Occupational Health and Safety Act

PPE – Personal Protective Equipment

RCA – Root Cause Analysis

SHE – Safety, Health, and Environment

5. General Principles

Metair is committed to ensuring a safe, healthy, and environmentally responsible workplace by embedding SHE principles into our corporate governance and operational framework. We recognize that effective SHE management is critical to protecting our employees, stakeholders, and the communities in which we operate. To uphold this commitment:

- The Executive Management Team remains accountable for ensuring the effectiveness of SHE compliance across the company, driving continuous improvement, and allocating sufficient resources for SHE initiatives. Management within each subsidiary is responsible for integrating SHE considerations into strategic decision-making, setting measurable safety objectives, and ensuring compliance with relevant national laws.
- Metair commits to fostering a transparent and open safety culture where employees are encouraged to report hazards, incidents, and unsafe conditions without fear of retaliation. A confidential reporting mechanism (whistleblower system) will be in place to ensure that all concerns are addressed fairly and in accordance with company policy and applicable labour laws.
- Metair commits to continuous SHE improvement through the execution of a minimum of one annual risk assessment at a group level, regular policy reviews, and ongoing SHE performance monitoring.
- Metair commits to ensuring legal compliance by maintaining a structured SHE Compliance Register annually, ensuring adherence to all relevant legal and regulatory requirements. Each subsidiary will be responsible for maintaining its own compliance register.

6. Environmental Principles

Metair is committed to environmental stewardship by ensuring compliance with legal and voluntary sustainability frameworks, minimizing our environmental impact, and continuously improving our environmental performance. We recognize our responsibility to protect natural resources, prevent pollution, and adopt sustainable practices across all operations. In line with this commitment, we will:

- Legal and voluntary compliance: Metair commits to compliance with, national environmental laws, global sustainability goals and voluntary sustainability reporting and disclosures, where relevant and applicable.
- Metair will fully comply with the requirements of current environmental legislation and codes of practice.
- Metair commits to implementing waste management principles through waste reduction, recycling, reuse and adoption of innovative practices and technological advances, aimed to reduce or eliminate Metair environmental impact, if practical;
- Metair commits to the pollution prevention measures through applying principles of continuous improvement in respect of air, water, noise, and light pollution, and reduce any impacts from our operations on the environment and local community.
- Metair commits to minimise energy and water usage in our buildings, vehicles, and processes to conserve supplies, and minimise our consumption of natural resources, especially where they are non-renewable.
- Metair commits to operate and maintain company vehicles (where appropriate) with due regard to environmental issues as far as reasonably practical and encourage the use of alternative means of transport and car sharing as appropriate.
- Metair commits to, as far as possible, purchase products and services that do the least damage to the environment and encourage others to do the same.
- Metair commits to assessing the environmental impact of any new processes or products we intend to introduce in advance.
- Metair commits to conducting training programs to promote the environmental principles adopted within our policies.

7. Health and Safety Principles

7.1 Occupational Health & Safety Risk Management:

Metair commits to implement a proactive, risk-based approach to OH&S by identifying, assessing, and prioritizing workplace hazards and risks. Each subsidiary shall maintain a documented Risk Register, which shall be updated at least annually. The register shall classify risks according to their severity and likelihood.

Risk mitigation measures will follow the Hierarchy of Controls:

- Elimination – Removing hazards where possible;
- Substitution – Replacing hazardous processes or substances with safer alternatives;
- Engineering Controls – Implementing physical barriers or process modifications;
- Administrative Controls – Enhancing procedures, training, and policies;

- Personal Protective Equipment (PPE).

Risk assessments shall be conducted at least annually, with additional assessments required prior to the introduction of new equipment, processes, or materials that may impact health and safety.

7.2 Hazard Identification and Mitigation

Metair shall maintain a structured Hazard Identification and Risk Assessment (HIRA) framework to continuously identify workplace hazards and implement appropriate controls.

This framework shall include:

- Routine workplace inspections conducted monthly;
- Risk analysis procedures will be conducted before the commencement of any high-risk activity.
- Employee participation in hazard identification through feedback and reporting mechanisms;
- Regular audits and investigations to ensure risk controls remain effective, where necessary; and
- All identified hazards will be recorded, prioritized, and assigned corrective actions within defined timelines based on severity and impact.

7.3 Incident Investigation & Corrective Actions:

Metair commits to a structured Incident Investigation and Corrective Action Program to ensure that all workplace lost time incidents (LTIs), near-misses, and safety concerns are investigated and addressed appropriately. Metair will ensure that any incidents, as defined by the Occupational Health and Safety Act (Act No. 85 of 1993) and any claims for compensation as required by the Compensation for Occupational Injuries and Diseases Act (Act No. 130 of 1993) are registered and reported in compliance with government regulations and best practice procedures.

Incident Investigation Process:

- All LTIs must be reported within 24 hours to the CEO or delegated management representative;
- A Root Cause Analysis (RCA) will be conducted for all recordable incidents;
- Corrective and Preventive Actions (CAPA) will be implemented based on findings;
- Lessons learned will be documented and shared across all subsidiaries; and
- Incident trends will be reviewed quarterly to inform safety improvements.

7.4 Occupational Health & Wellbeing:

Metair is committed to promoting a safe, healthy, and supportive work environment that prioritizes both physical and mental well-being.

To achieve this;

- Metair endeavours to incorporate ergonomic assessments and mental health support programs into its SHE management framework, where feasible.
- Metair promotes employees to remove themselves from unsafe situations without fear of retaliation.

7.5 Worker consultation and participation:

Metair commits to open participation of employees in shaping its SHE performance and commits to ongoing worker engagement through structured mechanisms.

Worker consultation will include:

- Establishing Safety Committees at all subsidiaries with representation from both management and employees;
- SHE engagement meetings shall be conducted at least annually to review workplace safety concerns and gather employee feedback.
- Implementing a worker hazard-reporting system, allowing employees to submit safety concerns anonymously; and
- Ensuring all workers have access to SHE trainings and are empowered to provide input on workplace safety practices.

8. Health and Safety Representatives

Metair is committed to fostering a safe and compliant work environment by ensuring effective worker representation and proactive safety management.

To achieve this, Metair will:

- Implement audits and inspections: Monthly safety inspections must be conducted at all sites;
- Ensure worker representation: Safety committees must include non-managerial employees; and
- Ensure regulatory reporting: Health and safety incidents will be reported in line with regulatory requirements.

9. Contractor and Supplier Health and Safety

Metair holds all onsite contractors and suppliers to adhere to the company's SHE requirements, including compliance with relevant Metair company standards and relevant national OH&S regulations. Before onboarding,

Metair will ensure that all contractors must:

- Undergo an OH&S compliance assessment and complete a SHE pre-qualification audit when relevant or required;
- Provide documentation of existing SHE policies, training records, and risk management procedures; and
- Assign a dedicated SHE officer for oversight if engaging in high-risk activities.

Metair endeavours to ensure that all suppliers must:

- Demonstrate compliance with relevant SHE laws, including environmental and safety requirements;
- Implement a formal safety management program; and
- Participate in Metair's annual supplier SHE audits, where required.

10. Performance monitoring and compliance audits

Metair commits to a structured SHE performance measurement and monitoring framework to ensure compliance, identify trends, and drive continuous improvement. SHE Performance metrics will be calculated at least once annually and reviewed by management.

Metair commits to tracking of SHE performance against the following targets:

- LTI Rate Reduction: Metair aims for a zero fatality and a lost time injury frequency rate (LTIFR);
- Blood lead levels within energy storage businesses: maintain a level below legal requirements and strive to have net zero additions annually
- Legal Compliance: Metair commits to 100% compliance with all relevant national and international SHE regulations;
- Employee Training Participation: Metair commits to the attendance of employees for required OH&S training; and
- Safety Audits Conducted: Metair is committed to ensuring that all sites conduct scheduled internal and external Occupational Health & Safety (OH&S) audits in compliance with legal requirements and for continuous performance monitoring.

Document Control & Record-Keeping:

- Metair commits to ensuring that all SHE policies will be reviewed and updated annually.
- Metair commits to ensuring all SHE training records are retained.

11. EMERGENCY PREPAREDNESS & RESPONSE

Metair is committed to safeguarding the health and safety of employees, visitors, and surrounding communities by ensuring effective emergency preparedness and response measures are in place.

To achieve this:

- Metair commits to ensuring that all sites will maintain Emergency Response Plans (ERPs) with assigned emergency teams.
- Metair ensures fire, chemical spill, and evacuation drills will be conducted at least once annually.
- Metair ensures all employees receive mandatory emergency response training at least once annually.