

HSE-GUIDELINE

Health Safety Environment



SubCtech GmbH

- Health
- Security
- Environment

Guidelines and measures



Subsea Technologies for the Marine Environment

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At SubCtech we...

- ... promote, support and contribute to sustain the health and well-being of all our associates.
- ... are committed to behave responsibly, minimizing risks and looking out for each other every day so that we all work safely.
- ... take all reasonable care to constantly minimize our environmental impact and to preserve the natural habitat for future generations.



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HSE as a holistic concept

The HSE principles constitute action maxims for SubCtech. In economic decision making as well as in our daily working routine the topics of environmental protection, health care, work, process and product safety are of great importance at SubCtech. In order to be successful, we at SubCtech work as a unit - from the management to the intern.

Our HSE guideline (health, safety and environment) provides a supporting framework for our employees in order to realize and achieve our HSE goals within the company. Hence, we are able to constantly improve all processes and use resources more efficiently. Regularly responsible specialist departments review the achievement of our HSE goals as well as evaluating new risks and identifying further potential improvements. Furthermore, they ensure the section's legal conformity.

The early detection of potential dangers when handling our products is important to us. This is why such dangers, detected or suspected by customers, employees or authorities, have to be reported immediately to the responsible department. This is the only way to examine, analyze and evaluate identified risks and to initiate appropriate countermeasures. In case the analysis' results show a danger to human or the environment, SubCtech will limit the marketing right up to the stop of the production line and will try to find alternatives or less dangerous solutions.

The HSE principles constitute action maxims for SubCtech. Additionally, SubCtech commits to the compliance of high standards in the fields of work and product safety, health care and environmental protection.

- **Continuous improvement and review**

Not only in the economic sector but also in achieving our HSE goals SubCtech strives for continuous improvement. We want to continuously develop and expand in this sector. In order to do so, we review the achievement of our goals regularly, set new, even higher goals and evaluate our current procedure. Thus, we can identify new potentials and create concepts for their implementation.

The strategies for improvement are an essential part of our quality management. Annually, we review the effectiveness of our HSE system. The achievement of defined and measurable goals in the field of

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health, safety and environment is used as a benchmark for the system's efficiency. With the help of findings in audits and management reviews, the HSE system is continuously developed and improved.

- **Compliance with statutory requirements**

SubCtech's management is obligated to act in accordance with statutory HSE rules and all relevant legal and industry standards forming a fundamental structure for the fields of health, safety and environmental protection.

Furthermore, SubCtech has committed to its own HSE guidelines. Following the company's own norms and principles, those guidelines are setting an even higher standard in terms of safety for customers, employees and the environment.

External consultants regularly audit those standards.

- **Transparent communication**

Transparent communication about health, safety and the environment is important to us, not only internally, but also with customers, business partners and suppliers. This is why we openly express and communicate our ideas and goals in this field. Thus, excerpts of our principles can be found via different media.

Transparency is an important subject for SubCtech. A matter of major concern is the communication with customers about the safe and environmental handling and disposal of our products.

- **Employee training**

Our employees are a key driver for realizing our concerns and ideas in the field of HSE. Without their participation the achievement of our HSE goals would be hardly possible. Therefore, our employees receive systematic training to ensure the immediate report and elimination of risks concerning health, safety or the environment.

Furthermore, we actively involve our employees in the further development of our HSE principles and appropriate courses of action by encouraging them to proactively contribute ideas and suggestions for improvements. Every employee becomes part of the project and takes responsibility for the environment, their own health and safety, as well as their co-workers.

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- **Process safety**

We want to guarantee not only smooth but also safe processes within our company. This is the only way to ensure the health of our employees and the reliability of our processes.

That requires a regular maintenance of our machines as well as frequent adjustments of our technologies and systems to new standards while compiling risk analyses for humans and environment. Thus, we can develop appropriate safety concepts, which include a safety check for new or maintained machines before using them for the first time. Our employees receive a special training for tasks and processes as well as the handling of the machines to ensure they work safely and efficiently.

Emergency plans are constantly improved, emergency drills are regularly exercised by the employees. Should emergencies or malfunction occur, an immediate report, followed by a thorough investigation leading to appropriate counter measures is obligatory. That also applies to the improper handling or breaches of duty by the employees. SubCtech is constantly improving the work safety while including every employee personally in the process.

- **Deviations**

Every accident as well as unsafe behavior or situations are systematically analyzed and documented. In the sense of a constant improvement, the findings will be used immediately to compile relevant measures.

Preventive employee safety and health protection

Work safety is among the prioritized topics at SubCtech.

Therefore, the project 'Zero Tolerance' was established, which is meant to ensure the work safety and prevent accidents entirely.

Thus, safety risks at the workplace need to be identified, reported and eliminated with the help of useful actions. Furthermore, appropriate safety measures are established if safety risks can not be eliminated completely. Employees receive special training on how to deal with those risks and prevent accidents.

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The foundation for that is an openly communicative and trusting relationship between the employees and the management as well as the observance of process and work instructions. Meanwhile, all employees are aware of their own health and safety as well as the health and safety of their co-workers.

This results in periodic meetings with the purpose of collecting and evaluating feedback and suggestions for improvement. Hence, the subject of work and health safety becomes a part of the daily working routine.

Health protection

We at SubCtech are aware that the company's success is inseparably connected to the success of our employees. This is why we value the maintaining and promotion of the employees' health. In order to do so, we have developed a comprehensive health program, which is meant to promote the physical as well as the mental health in our company. Besides local requirements from health, safety and labor laws, we have included further goals we deemed sensible and important.

Well equipped, partially air-conditioned social rooms, serving as collective space for meals and breaks.

One relaxation room, including a lounge for care or relaxation.

The supply of all entrances and exits with hygienic products, such as hand sanitizer.

The outdoor area features further seating.

In order to achieve our goals, our employees receive special training in acknowledging their responsibility concerning their health, understanding the health aspects of their work and openly communicate possible restrictions in their performance or changes in their state of health. In case of doubt, a new frame of work can be established if necessary. The entire personal commits to the establishment of necessary conditions for the compliance of those principles and to live them as a part of the company culture. It is the responsibility of the management to ensure the workplace safety and to identify probable health risks and eliminate them. If this is not possible, an appropriate area containing the necessary safety measures needs to be created, which is adjusted to the health requirements of the workplace.

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Therefore, a safety task force is regularly evaluating the work safety, the health protection and new requirements or situations as well as admitting suggestions for improvement. The task force is supported by an external company doctor.

The task force has proved itself valuable, e.g. during the COVID-19 pandemic, by initiating measures at a very early stage.

Furthermore, the management is also responsible for an open communication with the employees about their health issues, physical requirements as well as necessary qualifications for the assigned work.

SubCtech also responds to the special needs of the physically and mentally challenged. People with different disabilities have been successfully integrated.

Despite all efforts, employees might fall ill and miss work. SubCtech is trying to create a pleasant and suiting environment for those employees in order to ease their re-entry.

Measures for re-entry offered by SubCtech are flexible working hours, a reduction of the number of working hours, home office or a different task.

With our products we also value the maintenance of our employees' health as well as the customers' health. Hence, all our products can be disposed safely and without any risks. SubCtech is regularly scrutinizing its products and all the needed operating and auxiliary materials for potential health risks, followed by preventive measures to minimize possible negative effects.

Employee safety

Employee safety is of great importance to us. This is why we established the 'Zero Tolerance' project, to show that it is our belief that accidents of all kinds are preventable. The conditions at the workplace as well as the behavior of the employees are crucial to the project's success. Hence, our employees are actively included in the process of employee safety and its execution. It is essential for each employee to become aware of their responsibility concerning this topic, behave responsibly and follow the safety instructions. Furthermore, every employee takes responsibility in knowing about the potential risks of his workplace and has to strictly follow the instructions of their superiors.

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In doing so, employees should not only attach importance to their own safety but also protect their co-workers from potential safety risks. It is also in the employees' responsibility to immediately report potential safety risks as well as accidents or injuries. SubCtech attaches great importance to an open and trusting communication between employees and their superiors.

Therefore, a safety task force is regularly evaluating the work safety, the health protection and new requirements or situations as well as admitting suggestions for improvement.

The task force consists of a committee, including the safety representatives and named experts, as well as the head of the specialist department. The task force is supported by an external company doctor.

With the help of this task force, suggestions for improvement can be admitted and discussions about potential ideas or risks can be held. To have as much transparency as possible, the safety regulations and the process descriptions are compiled by the quality management as well as the affected employee and adjusted to the specific workplace and tasks.

We regularly offer internal and external trainings and workshops in order to extensively sensitize the employees for the topic of employee safety.

In addition to that, more and more employees are being qualified as first aider responders (UGS), ensuring to have at least one trained first responder in every building at all times.

Our safety requirements and regulations apply to employees as well as suppliers and business partners if they happen to be on the company grounds. Apart from the current legal regulations which we follow in terms of employee safety, we defined our own, further-reaching goals and requirements, where we consider the legal regulations insufficient.

First, additional first aid equipment as well as a number of different types of fire extinguishers and personal safety gear in order to maintain higher fire protection standards

Second, every room is equipped with illuminated exit signs, which help to guide the way even through heavy smoke.

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Preventive Environmental Protection

As a leading company in environmental technologies and given fact that the oceans build the foundation of our work SubCtech is particularly concerned about the preservation of our oceans and

the environment. On these grounds the topic environmental protection is firmly established in our corporate policy and values.

In the process of developing our products we are ensuring to manufacture environmentally friendly and safely in order to reduce negative impact on the environment to a minimum. SubCtech is continuously working on reducing emissions and water and power demand as well as using resources more efficiently.

Since waste disposal is an important matter to us, we are aiming to minimize waste in general in addition to recycling materials in sense of a closed-loop economy. Materials that cannot be recycled are disposed according to the regulations.

- **Environment protection**

Being a company for environmental technologies, SubCtech is particularly engaged in environmental protection and preservation of the oceans. A responsible, moderate and efficient use of resources, commodities and hazardous substances is of great importance to us. In doing so we are constantly in the process of progress and improvement.

It is our goal to keep the negative environmental impact to the lowest possible level, concerning both manufacturing and usage and disposal of our products. While handling hazardous substances we are following strict standards for usage and disposal of these substances in order to harm neither humans nor environment. At the same time, we are taking care of the increasing environmental compatibility of our products and thus of a desirable avoidance of toxicants. Where they cannot be avoided completely, we are following the above-mentioned principles.

Likewise, we are keeping the protection of the environment in mind when planning any further constructive measures of our company or when purchasing new machines and facilities. For instance,

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whenever purchasing new machines, we are placing importance on durability to protect the environment.

Our machines are also being retooled to minimize quantity lubrication in order to drastically reduce the amount of lubricants required.

When it comes to waste disposal, we are minimizing the accruing remnants and waste in the first instance. Where they cannot be avoided completely, it is necessary to recycle the remnants. In the unlikely event that remnants can neither be avoided nor recycled, we are striving for a responsible and environmentally friendly disposal. To accomplish a continuous improvement, we are constantly reevaluating all these principles and values.

By optimizing waste disposal and reuse of valuable substances, we were able to spare one disposal container.

On a regular basis we control the attainability of our goals and set new, advanced and measurable ones. This is our way of guaranteeing constant improvement and development of our company in the area of environment protection and of supporting environmental concerns.

If, despite all cautionary measures, there should ever occur any ecological damage due to SubCtech, we are ensuring that the consequences are minimized to the lowest possible level. Processes and instructions that assure a quick and reasonable approach are being kept available for such an event.

- Energy

Concerning the topic of energy, SubCtech is minding an efficient and sparing use of resources and favors renewable energy sources. We have been realizing new, innovative concepts for a long time now.

Entirely switching to LED lighting in all rooms (offices, storage rooms, workshops, halls, social areas) and the outdoor area reduced required energy by 50%, meaning that CO2 emissions also decreased by 50%.

Additionally, in the outdoor area all the lamps and spotlights are time or motion controlled.

When it comes to restructuring and renovation of our company buildings, we are opting for a sustainable and energy-efficient realization of the respective project. In the field of energy-efficiency

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we are constantly analyzing potential for improvement. If plans cannot be realized right away, we will find alternate solutions.

All the workplaces involving computers and monitors are being disconnected from the power grid via switchable outlets. Not only does this lead to energy and thus CO2 savings, but workplace safety is increased as well.

This goes for both efficiency enhancement and possible energy saving measures that can have a share in shaping our energy use more ecological. It helps us to continuously reduce the power demand.

- **Water**

Regarding the resource of water, we commit to using it sparingly and to raise awareness for its preciousness. On that account we realize individual measures to reduce consumption especially in the various departments, as well as holistic projects reducing the general demand.

For our testing facility we hence developed a circulatory system which avoids the constant addition of fresh water altogether.

All other processes basically get along without any water.

In addition to the cutting measures, SubCtech also values the preservation of water. Therefore, we care about using it responsibly and avoiding water-hazardous substances to the greatest extent. Where the use of said substances cannot be avoided completely, they are disposed according to regulations. In doing so, we are protecting the ecosystem and groundwater pollution is prevented.

- **Waste**

SubCtech targets to reduce the accumulation of waste and to recycle resources and valuable substances wherever possible. For that reason, we are constantly optimizing our processes and find new possibilities to avoid waste altogether. The valuable substances that cannot be avoided are being transmitted to the material cycle and reused if possible.

The company only provides glass deposit bottles for beverage supply in order to avoid plastic waste or disposable bottles entirely.

Coffee makers requiring capsules or pads are not allowed at SubCtech.

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Thanks to the consequent avoidance of waste, e.g. by optimizing the supply chain management, an entire disposal container was spared.

The amount of waste that is neither avoidable nor recyclable is being disposed ecofriendly and responsibly. Waste is being separated systematically and disposed according to regulations in our manufacturing facility as well as in offices and storage rooms, before the municipal waste disposal department arranges for the final disposal.

- Emissions

SubCtech is committed to climate protection and aims to decrease pollutant emissions steadily to contribute to environment preservation. To this end, we are regularly reconsidering and examining our current manufacturing processes - we are searching for solutions to reduce emissions and are aware of sustainable and ecofriendly execution when introducing new manufacturing processes.

In case of emerging exhaust air, it is cleaned according to regulations and finally deflected.

In addition to legal obligations, we installed filter systems into the spray booth. That way our company prevents a pollution of both humans and environment.

For the adherence of composite material, we were able to replace toxic adhesive with modern material being almost entirely emission-free.

- Resources

SubCtech advocates for an efficient and ecological way of using resources. In the process we count on recycling various materials, the avoidance of potentially environmentally hazardous substances and the usage of renewable resources. We are constantly working on restructuring our manufacturing processes to exploit potential room for improvement and to introduce ecofriendly alternatives.

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Revision History

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0.1	05.03.2020	LW	Document created	OK
1.0	09.03.2020	SM	Finale adjustments,	OK
1.1	11.03.2020	AS	Small corrections	OK
1.2	10.04.2020	SM	Small corrections, hint COVID-19	OK
1.2 rev1	14.04.2020	LS	Translation to English	
1.2 rev2	14.04.2020	SJ	Small corrections	
1.2 rev3	17.04.2020	MX	Small corrections	OK