

EHS POLICY

PROTECTION

The protection of employees and the environment is an essential element of the ARVOS Group business strategy.

ANYWHERE WE OPERATE WE SEEK TO

- prevent workplace injuries and illnesses.
- prevent negative environmental impacts.
- comply with legal and regulatory requirements.
- protect people and assets.
- handle resources (raw materials, energy, water) responsibly.

EHS COMPLIANCE IS SUPPORTED BY

- active management leadership.
- workforce engagement.
- effective processes.
- environmental and corporate social responsibility.
- effective personnel and organization.

ALL ARVOS GROUP EMPLOYEES

Shall comply with and actively support the intent of this policy, and strive to continuously improve the environment, health and safety in the workplace.

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1. OBJECTIVES

ARVOS is committed to maintaining and developing a pro-active Environmental, Health & Safety (EHS) culture throughout the group. Every ARVOS entity must recognize its responsibility towards employees, contractors, suppliers, customers, visitors and communities with which it works, to provide a safe and healthy environment and avoid injury or damage to people, environment and assets. Each ARVOS entity must comply with all applicable EHS laws and regulations wherever it operates, and must as a minimum standard seek to fulfill ARVOS' EHS requirements.

Achieving a high level of EHS standards will contribute to customer satisfaction, business results and employees' motivation. ARVOS' EHS programs must combine clear leadership by management with the active participation and contribution of all employees.

Anywhere ARVOS operates, this policy seeks to:

- prevent workplace injuries and illnesses.
- prevent negative environmental impacts.
- ensure compliance with legal and regulatory requirements.
- protect people and assets.
- handle resources (raw materials, energy, water) responsibly.

2. APPLICATION AND RESPONSIBILITIES

This policy applies to the entire ARVOS group, including all offices, manufacturing, construction and field services locations where Arvos has control of the site. Joint-Ventures are included where ARVOS is in control of work. All people working for ARVOS have to apply this ARVOS policy: permanent employees, fixed term contracts, temporary employees, trainees, apprentices, interns, contractors and visitors.

Each location managing director must implement effective programs and training to achieve best practice for EHS performance. This involves:

- to regularly assess operations, management systems and procedures.
- to establish measurement systems in order to ensure compliance with this EHS Policy and applicable laws and regulations.
- to report EHS data on a monthly basis
- to develop EHS KPIs for monitoring and improvement activities.
- to communicate EHS performance to employees, communities, customers and government agencies as required.

- to consider EHS impact in any change to existing practice.

Each ARVOS Division President is responsible for the provision of adequate resources to implement the EHS policy within their respective divisions.

Each ARVOS unit or entity shall report on progress and incidents/accidents to Division and Group management, as required. Each Division President shall execute an EHS performance review in their Division and will set new objectives no less than once a year.

All levels of ARVOS management are responsible for ensuring that ARVOS' EHS policy is communicated, understood, implemented and maintained throughout ARVOS.

3. REPORTING

3.1 SERIOUS EVENT/CRISIS REPORTING

For any serious event or crisis, or, any events or circumstances which may evolve into a major crisis, as defined in Appendix I of this policy, a notification shall be sent by the Unit Managing Director within 24 hours to the following distribution:

- Division President
- Division Human Resources
- Division Legal Counsel
- Division EHS
- And, as directed by Division President;
 - Group Legal Counsel
 - Triton Deal Team
 - Triton Portfolio Monitoring Department

Any public announcements or communications will be made only after consultation with the Triton Deal Team or Triton Portfolio Monitoring Department.

Based on the severity of the event, necessary steps may need to be taken to protect the people and secure the site, in accordance with local containment and emergency response procedures.

An 8D root cause analysis (RCA) is required for all serious events. Results of the 8D RCA should be published within 10 business days of the event to the distribution list above. Standard templates for the initial notification, 8D RCA and EHS event summary report are available from Divisional EHS representative. It is the responsibility of Division EHS to ensure that the data and summary from the event is cascaded within the ARVOS Group.

3.2 REPORTING OF EHS DATA

The EHS reporting of important environmental, health and safety data is performed through a standardized process and pre-defined KPIs. The EHS data must be reported by each business unit by the 5th business day of the month, or as required, to meet Group reporting deadlines, and, will be the source for the ARVOS Group EHS KPIs.

4. ENVIRONMENTAL

Each ARVOS location is required to comply with all governmental regulations related to air, ground water and soil contamination, asbestos and the management of hazardous materials and hazardous wastes. Each location will maintain a permanent record of all environmental data and assessments and communicate to ARVOS Group management any newly identified environmental incident that could result in financial liability. For ARVOS Group locations with more than 200 employees it is required to maintain an environmental management system compliant with ISO14001.

As part of the company requirements for reporting on environmental risks and liabilities resulting from local governmental regulations, each location needs to maintain a detailed knowledge of environmental condition of the sites it is operating or for which it retains environmental liabilities in order to ensure that the risks borne by ARVOS are properly assessed and dealt with. This knowledge is gained by means of environmental site assessments performed by qualified environmental consultants. Each ARVOS location with a potential environmental impact shall renew the site Phase I environmental assessment at least every 5 years unless an environmental incident requires that they do so earlier.

As a general rule, ARVOS retains environmental liabilities for all sites that the Company is operating or has been in the past (no matter whether ARVOS owns or rents the site). In addition, provisions for environmental risks should be recognized when ARVOS has a legal or constructive obligation as a result of a present or past event that could result in financial exposure.

When reasonably achievable, existing Asbestos Containing Materials (ACM) in building materials should be removed, but any ACM that represents a health risk to employees must be remediated immediately in compliance with local regulations. For any site that does have ACM present in building materials, a current asbestos management plan must be in place which includes periodic inspection and air monitoring, at least annually, to ensure that there is no risk of exposure to our employees or contractors.

It is strictly prohibited to bring products or materials containing hazardous highly regulated materials onto an ARVOS site. Hazardous highly regulated materials are defined in Appendix I. Any product or equipment that has been in service and is returned to an ARVOS factory for repair or rebuild must be free of any hazardous material and be accompanied by documentation that all hazardous material has been abated. Some locations may also require written approval to be given prior to shipment.

5. AUDIT STANDARD

The EHS Audit Standard defines the basis of ARVOS' standards for Environment, Health and Safety. This audit standard is used to evaluate the units' level of performance through self-audits and formal audits. The EHS Audit standards apply to all ARVOS units whether manufacturing sites, laboratories, offices with subcontract activity and customer or project sites in all countries of operations.

Each Division assumes responsibility for the content, scope and frequency of the audit. It is recommended that each site perform a self-audit a minimum of two times per year.

Audits aim at supporting the continuous improvement of EHS performance by measuring gaps between actual situation and reference levels/targets on different key EHS themes, defining recommendations and implementing improvement plans.

The EHS audit program is designed so that it incorporates the elements of high risk activities, management commitment, environmental management and health and safety. The objective of the audit program is to:

- provide measurable EHS KPIs to monitor continuous improvement
- periodically validate self-assessments through formal site assessments
- facilitate the sharing of experience among units through standardized assessments
- support the setting of objectives and progress review of EHS action plans

APPENDIX I: STANDARD EHS TERMS AND ABBREVIATIONS

Serious Event or Crisis:

- accidents or incidents where any persons have been killed or severely injured, including lost time accidents;
- accidents or incidents which have, or are likely to have, a major impact on the environment or significant media coverage;
- accidents or incidents including fires (including any unexpected shortages or disruption of supply) likely to cause a major business interruption;

Lost Time Accident (LTA): An injury preventing the injured person from working for more than 24h (one day).

Potentially Severe Event (PSE): A real event, which under slightly different circumstances, could have turned into a Severe Accident / Incident.

High Risk Activities (HRA): List of highly hazardous activities that are most likely to cause a serious accident or injury that require a greater focus on risk management. There are seven highly hazardous activities:

- Electrical Safety
- Machine Safety
- Work at Height
- Excavation Works
- Lifting Operations
- Site Vehicle Movement
- Confined spaces

Control of the seven high risk activities is managed through the use of the following three principles:

- Risk Management for High Risk Activities
- Control of Contractors
- Lock Out / Tag Out

The management of the HRA forms the basis of the EHS Audit Standard and detailed procedures for the high risk activities and risk management are available from Division EHS.

Highly Hazardous Regulated Materials:

- any of the following chemicals: arsenic, asbestos, benzene, beryllium or beryllium compounds, cadmium or cadmium compounds, carbon tetrachloride, cyanide, lead or lead compounds, mercury or mercury compounds, methyl chloroform, polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs), polychlorinated biphenyls (PCBs), tetrachloroethylene, trichloroethylene
- any radioactive materials, with the exception of regulated radiographic materials required for Quality Control Inspection.

ARVOS POLICY

EHS

May 1 2015

- designated ozone depleting chemicals as restricted under the Montreal Protocol (including 1,1,1 trichloroethane, carbon tetrachloride, Halon-1211, 1301, and 2402, and chlorofluorocarbons (CFCs) 11-13, 111-115, 211-217); greenhouse effect gas (GHG) targeted in the Kyoto Protocol (including CH₄, N₂O, SF₆, HFC, PCF, CO₂) shall be minimized and wherever technically possible replaced in the manufacturing process
- any substance otherwise prohibited or restricted under, as applicable, Regulation (EC) No 1907/2006 ("REACH") and/or Section 6 of the U.S. Toxic Substances Control Act ("TSCA")

Root Cause Analysis (RCA): A structured analysis of an event to determine the fundamental reason why an event occurred (as opposed to a direct cause which is often a symptom), there can be more than one root-cause per event. The 8D methodology is the standard analysis tool for serious EHS events in the ARVOS Group. The standard 8D EHS template can be found on the ARVOS Group intranet site.