

# SAFETY FIRST

**We prioritise health and safety, recognise and correct potential hazards, and follow best practice protocols and procedures.**

**We speak up and stop work if safety is compromised.**



**UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (SDG) CONTRIBUTIONS**

**3** GOOD HEALTH AND WELL-BEING



**6** CLEAN WATER AND SANITATION



**12** RESPONSIBLE CONSUMPTION AND PRODUCTION



SAFETY FIRST TARGETS 2022  
OVERVIEW OF PROGRESS

MAINTAIN A HEALTHY AND SAFE WORK ENVIRONMENT



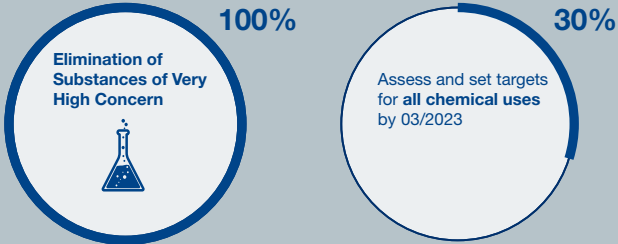
Actions implemented in 2022

- ✓ Safety target of a 23% reduction in accidents between 2020-2022 achieved.
- ✓ Training Roadmap set and roll out.
- ✓ Monthly Safety Newsletter in all languages; regular Intranet news; monthly communication of a Safety First training unit e.g. Working at heights, Permit work, Cutter risks, etc.
- ✓ Sites certified with ISO 45001: Carmignano, Dafeng, Zhuozhou. This brings the number of certified sites to 10 or 50% of all production sites.
- ✓ Various mental health training sessions held and tools available (further details within this chapter).

Challenges and Opportunities

- New sites included in the target scope (acquisition and greenfield construction of new sites). It takes time to implement a Safety First culture at the new sites, which is also an opportunity for sustainably embedding this into our operations.
- The ISO certification process has been slightly delayed due to COVID and operational reasons. Sites to be ISO 45001 certified in 2023-2024: Albacete, Ahmedabad, Chennai, Magog, Matamoros, Volpiano.

FURTHER REDUCE SUBSTANCES OF VERY HIGH CONCERN (SVHC)



Actions implemented in 2022

- ✓ 0% of all Gurit standard and essential products now contain Substances of Very High Concern (SVHC). Target was <5%.
- ✓ Chemical safety platform implemented and rolled out to 3 production sites during Q4/2022.

Challenges and Opportunities

- EU REACH and SVHC regulation updates continuously, with additional substances being added to the SVHC list annually.

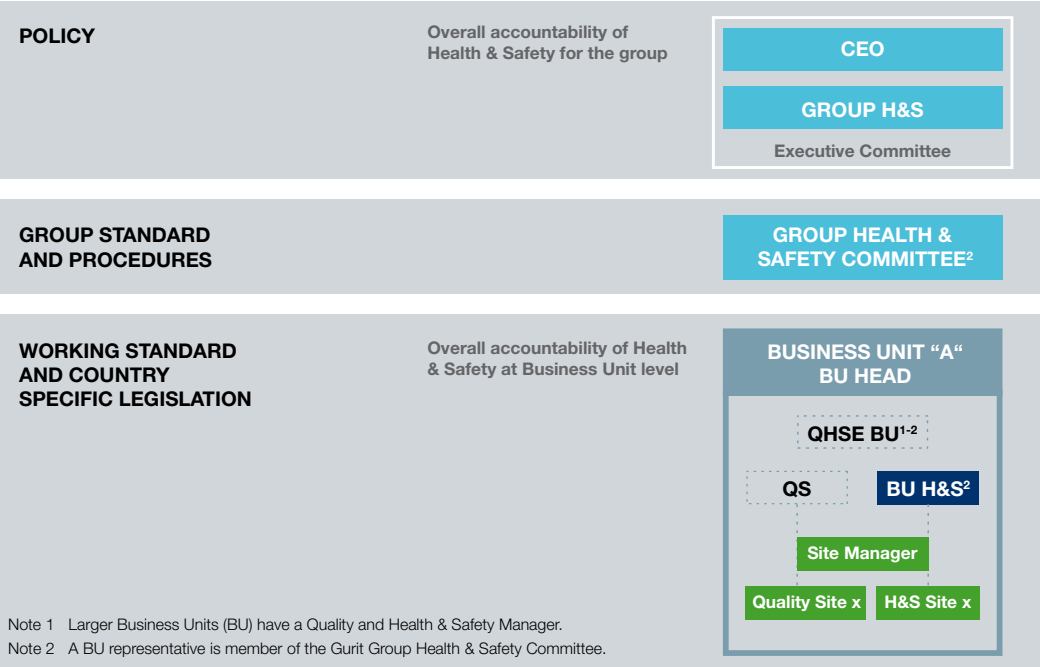
FOR HEALTH & SAFETY RELATED DATA AND INDICATORS  
PLEASE REFER TO THE CORRESPONDING METRICS SECTION IN THE APPENDIX PP. 204

MAKING SAFETY A PRIORITY

The Safety First occupational health & safety initiative was introduced in 2020 and since then we have set annual targets to reinforce our commitment to our employees, external workers and service providers, customers and partners. To achieve our zero work-related injuries and illnesses objective, commitment and determination at all levels of the organisation is required. We truly believe every accident is avoidable.

The prevention of accidents and incidents within our operations, employee and customer health and safety, and in particular chemical safety, have been identified as priorities and material topics for Gurit.

Safety First is one of the workstreams of Gurit's sustainability organisation. The Safety First core team coordinates the implementation of the Safety First initiative across the organisation. The core team is sponsored by a member of the Executive Committee and comprises representatives from each Business Unit, as well as Marketing-Communications and Human Resources. Compliance with legislation, anticipation of upcoming legislation and the implementation of best practice standards is supported by a dedicated Chemical Regulatory Compliance Manager. Each Business Unit manager is accountable for the safety performance within their area of responsibility; and each site manager is responsible for implementing the safety initiative and related standards, as well as establishing a safety culture within the local site.



Safety First Organisation

Performance indicators are reviewed either weekly or monthly at management meetings at all levels, including the Executive Committee, and at least yearly at Board level. Safety indicators such as Lost Time Accident Rates are part of management performance reviews and are an element influencing the variable performance compensation of site managers and Business Unit managers.

- GRI 2-13 Delegation of responsibility for managing impacts
- GRI 3-3 Management of material topics

SAFETY MANAGEMENT SYSTEM AND PROCESSES

Gurit has developed a comprehensive occupational **Health and Safety Management System**. The Safety First core team has, with support from an external consultant, established a strong foundation which has contributed to successful implementation of the Safety First initiative across all Business Units, sites and operations. The implementation and maintenance of a Safety First culture is supported by dedicated Health & Safety Officers at site level, an extensive training program, a monthly tracking system accessible via the Intranet, and a review of defined KPIs on accidents and incidents (LTAR, TRIR) at monthly Business Unit and Executive Committee management meetings.

All Gurit employees, contractors and onsite external workers are covered by our health & safety systems and processes.

The Gurit Health and Safety Management System comprises a global policy, as well as standards and procedures, which are adapted for local and national health & safety legislation requirements where necessary.

Important Group-wide standards applied are the Safety Pyramid, the Bradley Curve™, Incident Investigation & Reporting, Safety Walk and ISO certifications.

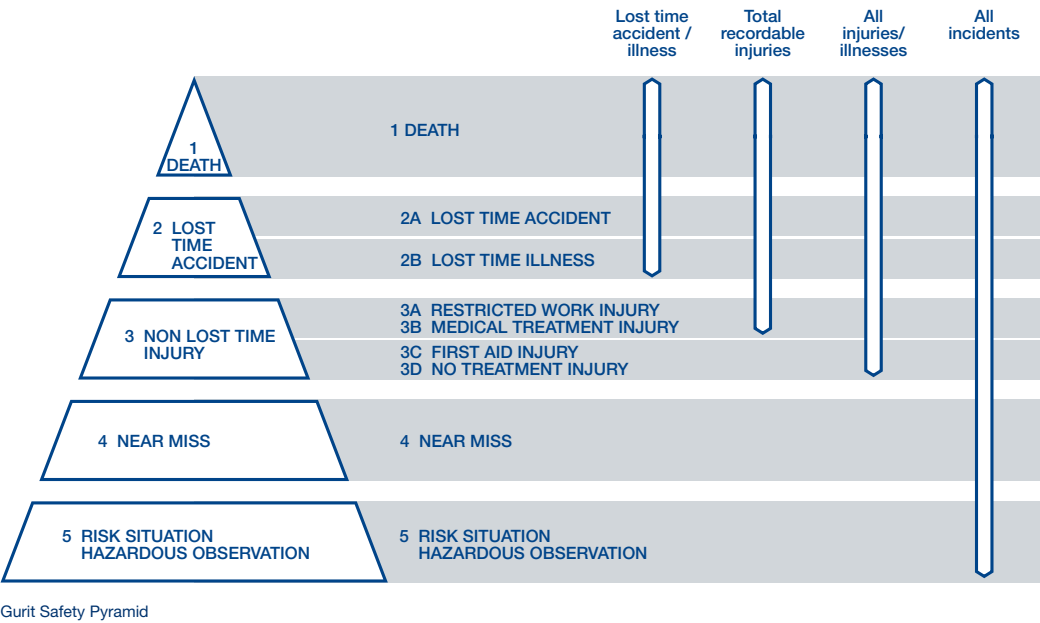
- GRI 2-9 Governance structure and composition
- GRI 3-3 Management of material topics
- GRI 403-1 Occupational health and safety management system
- GRI 403-4 Worker participation, consultation and communication on occupational health and safety
- GRI 403-8 Workers covered by an occupational health and safety management system

STRATEGY, MGMT SYSTEMS, POLICIES, DUE DILIGENCE

THE SAFETY PYRAMID

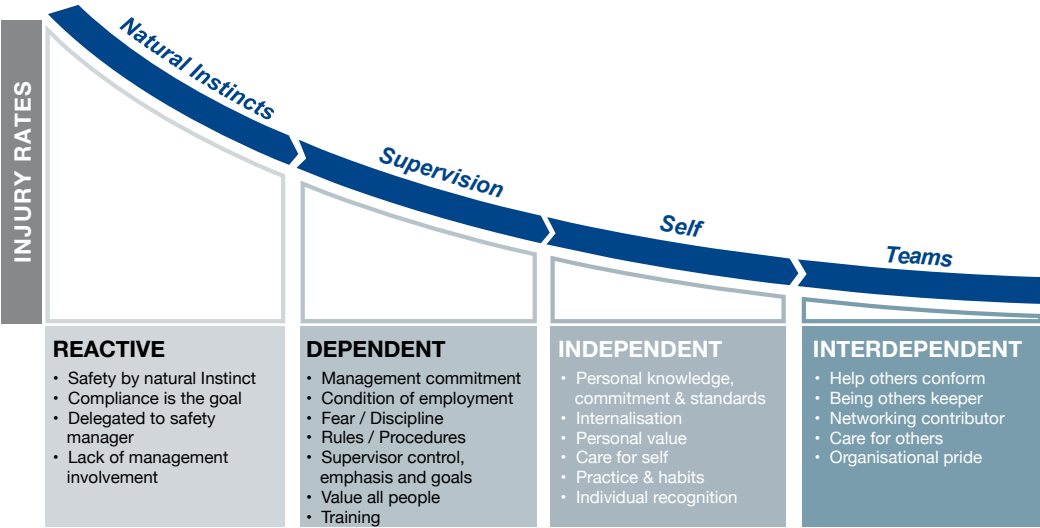
Gurit uses the Safety Pyramid as a strategy to reduce accidents within the workplace. The base of the pyramid is the observation of risks and hazards. Proactively looking for potential dangers throughout our operations, conducting systematic reviews of the workplace, and analysing lost-time injury data are the first steps towards reducing serious injuries.

By ingraining the evaluation of hazardous situations into the habits of all employees, the Safety Pyramid becomes a self-supporting tool that is likely to contribute to the reduction of near-misses and minor injuries, and then proportionally reduce severe injuries and deaths.



THE BRADLEY CURVE™ FOR MEASURING SAFETY AWARENESS

Gurit uses the DSS Bradley Curve™, to help us analyse awareness amongst our employees and understand the effectiveness of a successful safety culture from an early stage through maturity. **In 2022 all our legacy sites were able to progress further through the Bradley Curve, while new sites were being brought on board.**



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INCIDENT INVESTIGATION & REPORTING

The Incident Investigation & Reporting Standard provides guidance for a methodical and in-depth approach to health and safety incident investigations. This Standard includes an 8-step process which focuses on practical implementation and on building an awareness culture in all parts of the operations. To facilitate the implementation of the 8-step process, Gurit provides training on incident investigation methodologies to site managers, human resources managers and health & safety managers throughout the company, with a particular focus on Step 4 which is “Determine Key Factors / Causes”. These trainings are provided annually.

- Make Initial Response & Report**
- Form Investigation Team**
- Determine the Facts**
- Determine Key Factors / Causes**
- Determine Systems to be Strengthened**
- Determine Corrective & Preventive Actions**
- Document & Communicate Findings**
- Follow Up**

➤ GRI 403-2 Hazard identification, risk assessment, and incident investigation

➤ GRI 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

➤ GRI 403-5 Worker training on occupational health and safety



SAFETY WALK STANDARD

The Safety Walk Standard was introduced in 2020 at all production sites to improve habitual Safety First behaviour. The standard focuses on competent observation, the ability to learn from observations by sharing and discussing them with the purpose of eliminating risks, preventing incidents, and establishing a culture of putting Safety First and caring for each other.



In 2022, Gurit launched a new Safety Walk training programme in the Learning Management System, with the aim of further improving safety behaviour.

The observations from the Safety Walks are collected in the Safety First Platform, and monitored monthly on a site-by-site basis.

- GRI 403-2 Hazard identification, risk assessment, and incident investigation
- GRI 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships
- GRI 403-5 Worker training on occupational health and safety

HEALTH & SAFETY PLATFORM: TRAINING AND DATA COLLECTION

Gurit tracks and records health & safety data from all its sites through the **global Safety First platform**. All sites report monthly on Safety First KPIs and incidents and the workforce is directly involved in reporting the data.

Furthermore, the platform provides training resources for all sites and users. This is complemented by mandatory and voluntary courses on the corporate Learning Management System (LMS) platform, to which all Gurit employees with a company e-mail address have access.

- GRI 403-4 Worker participation, consultation, and communication on occupational health and safety
- GRI 403-2 Hazard identification, risk assessment, and incident investigation
- GRI 403-5 Worker training on occupational health and safety
- GRI 3-3 Management of material topics

INTRODUCTION OF A NEW CHEMICAL SAFETY MANAGEMENT SYSTEM

At Gurit, safety always comes first, and this also includes when using chemicals at our sites and in our products. **In 2022 we began the implementation of a comprehensive chemical safety management system.** In parallel, we continue to actively monitor the chemical safety and regulatory landscape for new data generation and emergent regulations affecting chemicals.

Chemicals throughout Gurit facilities must be continually evaluated and managed to ensure our employee and customer safety. This allows us to understand the chemicals used at Gurit, identify areas where the most harmful chemicals are used and target their elimination. The system encompasses safety datasheet availability, chemical risk assessments and accessibility to data in the event of emergency situations.

The platform we use, GoldFFX, helps us assess chemical risks according to the International Labor Organisation (ILO) model, looking at the latest hazard profile and exposure risk, as well as the impact on these if we were to make changes. A full risk assessment is generated encompassing all safety concerns and controls required. All risk assessments must obtain approval from line managers to ensure controls are appropriate and adequate. High hazard chemical products must receive a two-level approval to ensure they are handled correctly, and alternatives considered.

“A globally available chemical management system allows us to not only evaluate and manage the risks posed by chemicals used at Gurit sites but also to monitor and track the most harmful materials to a harmonised single standard. We have already seen that careful management of the chemicals used in our products can reduce the overall hazard profile of our product portfolio. We can now apply this same level of care to all chemicals used at Gurit.”

Amy Moram, Chemical Regulatory Compliance Manager



SCOPE AND COVERAGE

All sites, departments and processes involving chemical products are within the scope of the chemical safety management system. Sites with large maintenance, production and Technology & Innovation facilities were targets for initial roll out. **Three sites – Newport, Volpiano and Ecuador – have implemented the new system in 2022.** The full Group roll out is scheduled for completion in H1 2023.

- GRI 403-1 Occupational health and safety management system
- GRI 403-2 Hazard identification, risk assessment, and incident investigation
- GRI 403-8 Workers covered by an occupational health and safety management system
- GRI 3-3 Management of material topics

ISO-CERTIFIED MANAGEMENT SYSTEMS AT SITE LEVEL

In 2020 we launched a company-wide initiative to certify all our sites with ISO 14001 and ISO 45001 by 2024, helping us run our operations in the safest and most effective way.

- **ISO 9001** is a quality management system and is based on principles of a strong customer focus, the involvement and leadership of top management, the process approach and continual improvement.
- **ISO 14001** sets out the criteria for an environmental management system and provides a framework for effective environmental management and assures that environmental impact is being measured and improved.
- **ISO 45001** aims to improve occupational health and safety standards by reducing risks in the workplace as well as creating better and safer working conditions.

We are planning to have 100% of our production sites certified by all three ISO management systems by the end of 2024. For further details please see the metrics section in the Appendix.

- GRI 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships
- GRI 403-1 Occupational health and safety management system
- GRI 403-8 Workers covered by an occupational health and safety management system

WRAP-UP: POLICIES, GUIDELINES AND STANDARDS

- Safety Policy
- Hazardous Chemicals Management Policy
- Safety Pyramid
- Bradley Curve
- Safety Walk
- Incident Investigation

SAFETY FIRST – MANAGING RISKS

Gurit has set up a system that supports site managers in identifying risks and evaluating all areas that influence a site’s safety performance, establishing priority areas to be addressed, and supports the follow up of the resulting actions. A standardised self-assessment questionnaire is completed by each site, then reviewed biannually at a site and Business Unit level. The local site management conducts the self-assessment, jointly with site operations, maintenance and safety managers to ensure consistency and agreement across the functions.



SAFETY AUDITS

Since 2021 we have carried out internal health and safety audits, with every site to be internally audited every 3 years. Since 2021 the following sites have undergone a safety audit: Volpiano, Falces, Newport, Carmignano and Matamoros. Audits of additional sites were planned but delayed due to the pandemic for operational reasons; they will be started or planned in 2023.

RISK REPORTING – SUPPORTING SAFETY AWARENESS

**In 2022 Gurit planned and prepared several improvements to our internal Safety First platform which will be implemented in 2023.** These updates focus on ensuring the tool is aligned with our organisational structure as well as providing a clearer reporting format and the creation of a section where **the site representatives will be able to report any product-related health & safety incidents reported by our customers.**

We focus on involving all employees and production sites in the Safety First initiative and every year this employee involvement increases, as demonstrated by the increased number of risks reported. **7 693 risk situations were reported in our internal platform during 2022**, compared to 5 076 in the previous year. Therefore, detection of risk situations has increased by 51% since 2021, with the involvement of all our production sites to detect and correct them, demonstrating a strong culture of safety first, without fear of reprisal.

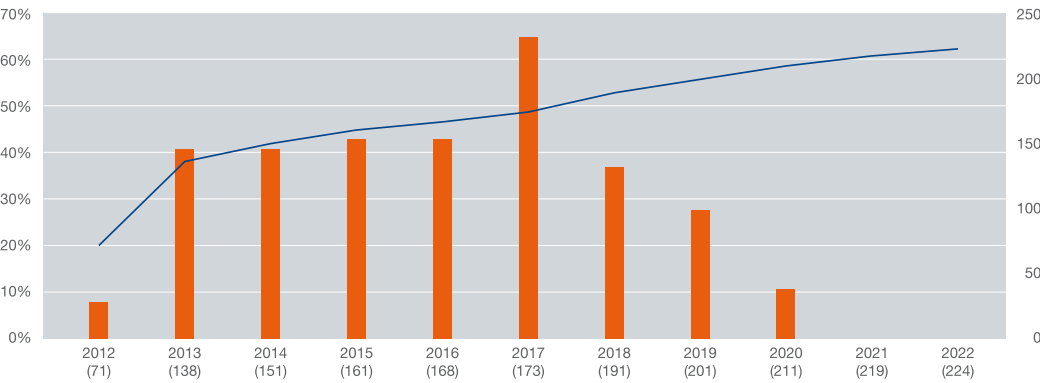
- GRI 403-1 Occupational health and safety management system
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- GRI 403-8 Workers covered by an occupational health and safety management system
- GRI 403-9 Work-related injuries

MONITORING PRODUCT-RELATED CHEMICAL SAFETY

Gurit has continued its program of proactively monitoring the safety and regulatory landscape of chemicals in its products through implementation of the **Hazardous Chemicals Management Policy**.

Since the advent of the European Union’s REACH regulation (Registration, Evaluation, Authorisation and Restriction of Chemicals) in 2008, the European Chemicals Agency has designated an increasing number of Substances of Very High Concern (SVHC). In 2022, 224 substances were designated SVHCs. Recent developments under the European Commission’s Chemical Strategy for Sustainability are likely to result in the widening of criteria for SVHCs to include endocrine disruptors and chemicals that persist in the environment. In light of the increased SVHC scope, Gurit has broadened its goal to now include all price listed products in the SVHC reduction targets.

GURIT SUCCESSFULLY REMOVED SVHCS FROM MOST OF ITS PRODUCTS



Gurit standard and essential products containing >0.1% SVHCS (orange bars) vs ECHA designated SVHCS (blue line)

Further developments in frameworks such as Safe & Sustainable by Design (see the Circularity Chapter for more information) place importance on removing not only those chemicals regarded as SVHC’s but also any chemical with a CMR classification (Carcinogenic, Mutagenic or Reprotoxic). Gurit has been working for some time on removing such chemicals from its product ranges and as a result currently maintains <20% standard and essential products with a CMR class 1 or 2 classification.

➤ GRI 2-27 Compliance with laws and regulations  
➤ GRI 3-3 Management of materials topics  
➤ GRI 403-2 Hazard identification, risk assessment, and incident investigation  
➤ GRI 403-9 Work related injuries

ASSESSING HAZARDS OF PRODUCTS

In order to help target products for reformulation, each finished product Gurit manufactures receives an internally generated High Priority Chemical (HPC) score. The scoring system aims to identify those products not only with SVHCs present but also with high hazards. Products are categorised into 4 classes based on severity of hazards: red, orange, blue and green.

- Red Re-formulate as soon as feasible.
- Orange Undesirable, target for reformulation.
- Blue Use with caution, potential for hazard reclassification expected.
- Green Low hazard rating.

The system takes into consideration not only regulatory restrictive hazard classifications but also those chemicals that may have unacceptable human and environmental impacts such as Persistent Bio accumulative Toxicants (PBTs) and Endocrine Disruptors. Since 2017 Gurit has worked to remove these high hazard products from its range and **in 2022 reduced the number of red category products in our standard and essential range from 37% to 10%**. Work will continue in 2023 to reduce the number of these chemical products further.

PRODUCT DEVELOPMENT AS AN OPPORTUNITY TO FURTHER REDUCE HEALTH AND SAFETY RISKS

When developing new products, particularly within the formulated product range, Gurit assesses and removes the most harmful chemicals. Each new product development undergoes a rigorous regulatory risk assessment process to ensure the right chemical selection is achieved. As well as new product developments, an opportunity to simplify the Gurit product ranges exists.

For example, we now offer one range of hardeners for both our infusion and hand laminating systems. Both PRIME™ and AMPREG™ resins use the AMPREG™ 3X range of hardeners. This means the health & safety benefits of the low toxicity laminating systems have now been extended to the infusion range, it has simplified the range for customers, and results in reduced waste generation.

SAFETY TRAINING

Based on reported data and the main risks identified, a **Health & Safety Training Roadmap was put in place in 2022**, for both employees and contractors. Safety training to date has primarily focussed on two standards - namely Incident Investigation & Reporting and Safety Walk. Now additional topics will be included.

**In 2022, Gurit introduced a Safety First awareness training programme for employees directly linked to a manufacturing function.** The main goal of this initiative was to remind them of the importance of Safety First in their daily work. The training sessions are provided in local languages (Spanish, French, Chinese, Italian, Turkish and English). In the first phase, these sessions have been completed by 260 employees who have access to computers. They in turn act as trainers and deliver the training to the rest of the direct employees at each local site.

During the sessions, Safety First videos and testimonials are shared, followed by discussions around lessons learned and a Q&A session. The sessions are made available to all employees in the internal Safety First portal. Feedback and learnings are collected and shared via the safety organisation.



- GRI 403-2 Hazard identification, risk assessment and incident investigation
- GRI 403-4 Worker participation, consultation, and communication on occupational health and safety
- GRI 403-5 Worker training on occupational health and safety
- GRI 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

MITIGATING MENTAL HEALTH RELATED RISKS

Gurit wants its employees to feel safe, not only physically but also mentally. **During 2022, we continued our mental health programme introduced in 2021**, sharing best practice examples from our sites. Some Gurit sites hosted local workshops and webinars where different aspects of mental health and well-being were discussed, including practical tips the employees can implement themselves in their daily routine.

“The purpose of our Mental Health webinar series is to see what other sites are doing to increase the awareness of mental health and well-being of our employees.”

**Begoña Fernández**, Safety First Sustainability workstream lead



“We want to empower our teams to take care of their own mental health as well as their colleagues’. We are practicing gratitude on a regular basis, holding team building activities to get to know each other better and boost team spirit. All of this helps to build a support system and trust between colleagues.”

**Marisol Buenrostro**, Quality Manager Mexico  
**Alejandra Alamos**, HR Manager Mexico

NEWPORT SITE WINS HEALTH AND WELL-BEING AWARD

In 2022, our site in Newport, UK, won the Isle of Wight Chamber of Commerce’s Workplace Health and Well-being Award. This award is recognition of the dedication and commitment to the well-being and mental health of our employees.



Gurit UK presented with an award for its commitment to the wellbeing of its employees



EMPLOYEE ENGAGEMENT AND COMMUNICATION ON HEALTH & SAFETY

As part of an ongoing support to the Safety First initiative, Gurit has strengthened its internal communication at Group and site levels.

OVERVIEW OF COMMUNICATION ACTIONS

- Monthly Safety Newsletter, translated to all local languages, electronic and print
- Safety meetings and briefings at a site level at shift change
- Intranet news updates
- Gurit TV internal signage system, to reach staff and shopfloor worldwide
- Safety First Portal on the Intranet
- Learning Management System
- Group and local Townhall Meetings
- Training initiatives
- Site visits and audits
- OneGurit magazine
- Employee Engagement Initiative and focus groups



Safety Training in Mexico

➤ GRI 403-4 Worker participation, consultation, and communication on occupational health and safety

CELEBRATING SUCCESS: TOWARDS ACHIEVING OUR GOAL OF ZERO ACCIDENTS

Several sites celebrated 365 days or more without a Lost Time Accident, an achievement of which we are proud, and which demonstrates the effectiveness of the Safety First programme.



2 YEARS WITHOUT ACCIDENT AT GURIT NEWPORT, UNITED KINGDOM

In March 2022 our Newport site accomplished two full years without Lost Time Accidents (LTA) and had maintained this status at the time of writing. A small celebration was held with the team to mark the occasion.

Gurit Newport celebrates 2 years without an LTA

1000 DAYS WITHOUT AN ACCIDENT AT GURIT FALCES, SPAIN

Gurit Falces exceeded 1 000 accident-free days in September 2022. It was unprecedented at Falces and demonstrates the progress the site has made with its safety practices.



Gurit Falces exceeds 1000 accident-free days

“The company’s main value is Safety First and, as a Site, we comply with this in our day-to-day work, demonstrating our commitment to safety. Safety is something that we must work on in every area and at every moment, since any mistake, any small error, can have fatal consequences. Reaching this figure makes us feel especially proud but, as we say, we cannot let our guard down.”

Jesús M<sup>a</sup> Aldaz Echarte, HR Manager, Falces



BEING PROACTIVE WITH CUSTOMER HEALTH & SAFETY

Although Gurit endeavours to remove the most harmful chemicals from its products, due to the nature of the chemicals used, some hazards are unavoidable. To ensure effective communication around the safe use of such products, we have several systems in place:

1. SAFETY DATA SHEETS

Customers receive product Safety Data Sheets electronically through an automated delivery system linked to the ERP ordering process. They therefore have time to plan for safe and effective handling and storage before the product arrives on site. Updated documents are distributed by the same automated system and each customer receives a unique login to the online system where they can retrieve all the latest copies of their Gurit product SDSs.

2. WEBSITE

The Gurit website has a section devoted to handling our products in a safe manner. Here customers can view general guidelines on handling formulated, prepreg and core products as well as a direct link to request SDS by email. Information on relevant legislation and Gurit's current Hazardous Chemicals Management Policy are also accessible: → [www.gurit.com/en/our-business/composite-materials/product-stewardship](http://www.gurit.com/en/our-business/composite-materials/product-stewardship)

3. CHEMICAL SAFETY INCIDENT REPORTING



**In 2022 Gurit implemented a process where all data and information about chemical safety incidents reported by our customers are collated and monitored in our Safety First platform.** In this way we can monitor the common issues facing our customers and we can work towards managing these in new product developments. Chemical exposure incident information is collated from all of the following sources:

- Calls to the Gurit's third party chemical emergency response line (NCEC)
- Direct contact from customers experiencing difficulties (i.e. email to tech support, customer support or the regulatory email address)
- Direct contact from official bodies such as medical professionals or poison centres to the SDS contact.

Confidentiality of individuals is maintained as the data is gathered to monitor general trends in exposure incidents rather than specific details.

➤ GRI 3-3 Management of material topics

SAFETY FIRST TARGETS AND MEASUREMENTS FOR 2023 ONWARDS

 2023 TARGETS	 HOW WE ASSESS OUR PROGRESS
<b>Certify 100% of our production sites with ISO 45001</b> for occupational health and safety by 12/2024	% of Gurit production sites certified with ISO 45001, or planned to be certified.
Further <b>reduce the number of accidents</b> and incidents and maintain a Lost-Time-Accident-Rate (LTAR) of no higher than 3.00 at Group level	LTAR (Lost Time Accident Rate) 2023 vs. 2022 vs. 2020
Further <b>reduce incidents</b> and maintain a Total-Recordable-Incident-Rate (TRIR) of no higher than 7.00 at Group level	TRIR (Total recordable incident rate)
Implementation of the <b>new Chemical Safety System</b> at all Gurit production sites by 12/2023	% of Gurit production sites with Chemical Safety System implemented
Assess and set <b>targets and corrective actions for all chemical uses</b> at Gurit production sites by 03/2024	% of Gurit production sites with chemical targets and corrective action plans
<b>Reduce and maintain &lt;5% of all Gurit price-listed products containing Substances of very high concern (SVHC)</b> according to European REACH regulation 2023 requirements	% of all Gurit price-listed products containing Substances of very high concern (SVHC) 2023 vs. 2022 vs. 2020
<b>Maintain below 20%</b> the number of finished products on our price lists that <b>may contain substances classified as as Carcinogenic, Mutagenic or Reprotoxic (CMR)</b> according to EU classification CLP	% of all price-listed products classified as CMR
<b>Review hazardous chemicals management policy</b> to align with Safe & Sustainable by Design topics and the EU Chemical Strategy for Sustainability	Revised policy published by 12/2023