GROUP POLICY



Health, Safety and Environmental (HSE) and "Say No To Risk!" is a core value in TMD Friction which will never be compromised. This HSE policy will be implemented worldwide with the expectation that senior management at each facility takes ownership and responsibility for its application.

TMD Friction will continue to use proactive measures. These are set out in the 2022-2025 HSE objective and KPI's and the business sustainability improvement roadmap, which are designed to continually improve HSE and promote a workplace culture that is intended to reduce the number of accidents, injuries and environmental impacts.

TMD Friction facilities will:

- We plan and execute activities and tasks properly.
- Embed a continual and sustained focus on our critical life risks.

PREVENT ACCIDENTS

- We **identify and control risks** through proactive application of appropriate machine safety, personnel protective equipment, workplace ergonomics, fire protection, emergency preparedness, technologies and procedures.
- We provide **clear instructions** and **adequate training** to our employees.
- We act quickly by stopping unsafe behaviour or workplace conditions.
- We **aim** to achieve 100% safe working conditions.
- We are all HSE leaders and take the responsibility for HSE excellence and "Say No To Risk!"

LEAD BY EXAMPLE

- We **support the HSE programs** and activities of our stakeholders, suppliers and contractors.
- We **fully engage our workforce** so employees are physically, emotionally and intellectually connected and empowered to **"Say No To Risk!"**

COMMUNICATE ACTIVELY

- We **communicate effectively** and consult openly between management and employees.
- We cultivate open and accurate HSE reporting and learn from root-cause analyses.
- We acknowledge good HSE behavior.
- We strive to minimise the environmental impacts of our business and to prevent pollution
 by continually improving our environmental performance through, a regularly reviewed
 programme of objectives and targets that promote carbon free electricity, clean air energy
 efficient work practices and landfill reduction objectives.

MINIMISE THE ENVIRON-MENTAL FOOTPRINT

- We continue to find opportunities to reduce the use of energy and resources through continual investment in our infrastructure and education of our employees.
- We regularly **review and assess** the materials and consumables used in our facilities and replace hazardous materials through responsible chemical handling and management.

Our Global HSE Operating systems are aimed at providing suitable and sufficient resources, and training to ensure compliance with all applicable legal and company requirements. Each TMD Friction manufacturing facility will maintain suitable management systems and legal compliance registers that meet or are equivalent to ISO Health, Safety, and Environmental and Energy standards.

Internal monitoring and auditing are vital parts of the TMD Friction HSE compliance program; these will be undertaken at prescribed intervals to ensure compliance. Senior management at each site will ensure prompt response and corrective action for detected problems as appropriate under the circumstances.

TMD Friction EVP HSE will oversee and periodically review the following with the CEO and Senior Management Team; (1) integrity of the Company's HSE compliance performance; (2) internal disclosure and compliance control systems, and; (3) the implementation and effectiveness of the Company's programs to promote compliance with its legal and regulatory requirements.

Conformance to and applicability of this HSE Policy will be reviewed as part of the company's strategic deployment process, which is applied throughout all TMD Friction sites.

This Policy is binding for all companies, sites and functional areas of the TMD Friction Group and its affiliates.

TMD Friction Holdings GmbH

David Baines

President and Chief Executive Officer