

Health & Safety Policy

Context & Scope

Context: Sustana produces sustainable, premium recycled fiber and paper. We work with leading brands, corporations, and customers to create environmentally friendly, sustainable solutions for their packaging and printed material needs and utilize post-consumer material to create high-quality, low carbon products. Our facilities, operations, and personnel, as well as the majority of our customers and suppliers, are located in the United States and Canada.

Scope: This policy applies to Sustana, all its subsidiaries and all its employees and other entities working on behalf of Sustana.

Our Commitment

Sustana is signatory to the [United Nations Global Compact](#) (UNGC) and supports its Ten Principles. Sustana also recognizes, and its policies and actions are informed by, the following:

- United Nation (UN) Guiding Principles on Business and Human Rights
- International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work
- ILO C155 – Occupational Safety and Health Convention 1981 (No. 155)

Our culture is built around our care for others which includes fostering a safe and healthy work environment where employees are accountable, proactive, and vigilant. We have high operating standards to meet or exceed all applicable laws, regulations, and standards to ensure the health and safety (H&S) of our employees and maintain an environment that supports zero injuries, accidents, and unsafe behaviors. We all play a key role in the success of our safety program and keeping all who enter our facility free from harm.

Sustana strives to maintain a positive H&S culture where all employees feel involved and empowered with their own safety and that of their co-workers. All Sustana employees are strongly encouraged to actively participate in some aspect of our H&S program, committee, meetings, and facility audits.

We prioritize the well-being of our team members, recognizing that their physical and mental health is crucial for them to thrive both personally and professionally. We foster a supportive work environment that promotes work-life balance, encourages open communication, and provides opportunities for growth and development. Through flexible work arrangements and employee assistance programs, we aim to create a positive and inclusive workplace where our employees feel valued and supported.

Our Program

A full set of measures are in place to secure H&S of all employees:

- All employees and workers who are not employees but whose work is controlled by Sustana (100%) are covered by our occupational H&S management system that is regularly reviewed for continuous improvement.
- A regular mandatory training of all relevant employees on H&S risks and good working practices is in place, supplemented by work instructions and procedures associated with high-risk activities.
- All new employees receive a mandatory health checkup.
- All employees have access to company funded programs regarding mental health and anti-stress through local Employee Assistance Programs.
- Regular inspection to ensure safety of equipment takes place.
- Safety committees cover all US and Canadian plants.
- A safety contractor checklist and contractors' health and safety assessment scheme are in place.
- All locations shall have a rigorous safety risk assessment process designed to proactively identify occupational safety hazards and risks and control potential effects in place.

Safety Rules

To help us provide a safe working environment for our associates, the following rules, procedures, guidelines, and policies must be followed at all Sustana locations. Additional location-specific H&S policies and guidelines are provided where applicable. Failure to follow these procedures may result in corrective action, up to and including termination.

- All safety-related rules and procedures must be followed by all employees at all times.
- Report any accident, injury, incident, unsafe condition, or act, near miss or property damage to your direct supervisor immediately.
- All personal protective equipment (PPE) or clothing must be worn as required.
- No employee shall remove, displace, damage, destroy or disconnect any safety device or safeguard.
- All machine guards must be in place before starting or operating equipment. Do not remove a guard during machine operation.
- Only use, adjust, or repair equipment when authorized.
- All lockout/tagout policy standards must be followed.
- Access to all exit doors, aiseways, walk-path egresses, fire extinguishers, and sprinkler control valves must always be kept clear.
- Use proper lifting techniques; if an object is too heavy, get help.
- Keep stairwells clean and free of clutter that may cause a hazard.
- Inspect all ladders and step stools before use, ensure they are in good working condition and use them properly.
- Use only hand tools that are in good condition. Inspect tools prior to use.
- Place cones and caution tape to alert others of any hazard or spill.
- Only authorized and trained employees may operate powered industrial vehicles.

- Possession of, or consumption of alcohol or drugs at any time on company property or reporting to work under the influence of alcohol or drugs is strictly prohibited.
- Smoking and the use of tobacco is permitted only in designated areas outside the facility.
- Any violation of the violence and firearms policy is strictly prohibited.
- Complete all required safety training in a timely manner.
- Good housekeeping practices are required throughout the facility and grounds. Deposit waste in proper receptacles provided. Keep your work area clean and orderly and clean up spills immediately. Good housekeeping is the foundation of any good safety program.

Targets

Our ambition is to have zero accidents. To hold ourselves accountable for providing a safe workplace, we have disclosed our H&S targets and strategy in our sustainability report.

Reporting

Any violations, concerns or questions regarding this policy and compliance to the H&S rules should be reported promptly through appropriate channels by any Sustana employees or third parties to supervisors, local H&S manager, management, or Human Resources.

Governance

This policy is supported and has been approved by Sustana's Chief Executive Officer, Chief Operations Officer, Chief Commercial Officer, Chief HR Officer, and Vice President of Sustainability. The Senior Management ESG Committee shall review this policy annually to make continuous improvements to our H&S effort and update this policy based on lessons learned, insights, and best practices. The Chief Operations Officer is responsible and accountable for the implementation of this policy.

Communication and Transparency

This policy shall be made publicly available on Sustana's website and shared with all employees. It shall be referenced in Sustana's Employee Code of Conduct.

Legal Disclaimers

Sustana reserves the right to modify this policy at its discretion. Updated policies will be shared in a timely manner.

Effective: June 6, 2023

Document Control

This policy must be reviewed and approved by the ESG Committee on an annual basis.

Action	Major Revisions and Comments (if any)	Version and Date
First Edition	First version drafted by Chief Operations Officer, and reviewed by the CEO, CCO, Chief HR Officer and Vice President of Sustainability.	Version 1 June 6, 2023



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