Guideline Safety first

**Approved by the President and CEO of
Luossavaara-Kiirunavaara AB (publ)
January 27th 2022**

Guideline Safety first

Document information	
Type of governing document:	Group guideline
Adopted by:	President and CEO, LKAB
Date of adoption:	2022-01-27
Valid as from:	Adoption date unless otherwise stated
Group guideline manager:	Senior Vice President, Sustainability
Applies to:	LKAB Group

Revision log		
Date	Comments	Languages:
2022-01-27	Version 1 – New group guideline, adapted to the new governance model.	Swedish, English

1. Introduction, purpose, scope

1.1. Introduction

By being committed, innovative and responsible, we will ensure a safe and healthy work environment in all of our workplaces. To succeed in this endeavour, in this guideline we describe the fundamental principles for conducting work-environment and safety work throughout the entire LKAB Group.

This guideline supplements the sustainability policy. Together with the code of conduct, the management philosophy, the group guideline for personnel, and the risk management policy this guideline sets the framework for our common work environment management.

1.2. Purpose

The purpose of this guideline is to ensure a Group-wide approach to health and safety management in order to achieve our zero vision for accidents and work-related ill health, as well as the Group's goals for safe and healthy workplaces.

This will be controlled via procedures and work processes for each operation included in the Arena management system.

1.3. Scope

This group guideline applies to all LKAB Group employees and to others who carry out assignments within LKAB's operations.

2. Governance and implementation

2.1. Roles and responsibilities

Role	Responsibility
President and CEO	Approves governing documents and ensures that governing documents are in line with the company's strategic direction and owner requirements.
Senior Vice President, Sustainability	Has a delegated responsibility, from the President and CEO, for the group guideline, which includes: • Responsibility for the governing document • Follow-up and compliance • Revision
Business area managers, group-staff managers and managing directors	Will ensure that employees in the respective operations are familiar with, and act in accordance with, Safety First. Responsible for developing and implementing local complementary control when necessary.
Managers	Always bear responsibility for the work environment for their co-workers. Managers are responsible for ensuring that operations/projects are conducted in accordance with Safety First and national laws and regulations.
Purchasers/contact persons for external suppliers/contractors	Will ensure that the company's expectations with respect to Safety First are communicated to suppliers/contractors.
Work-environment functions within the Group	Will support and ensure that work-environment and safety work is conducted in line with Safety First.
Safety Officers	Are responsible for overseeing compliance with Safety First and is responsible for representing employees in work environment issues
Co-workers	Will be familiar with, and act in accordance with, Safety First.

2.2. Implementation

Implementation and follow-up of the governing document via "the path of the work environment issue" (see 3.5).

2.3. Publication

Governing documents shall be published internally on the group-wide webpage in the Arena management system.

3. Safety First

Safety First is the concept according to which we work to ensure a safe and healthy work environment. Safety First sets the framework for our work-environment effort and will be developed in line with our strategy. To be able to go to work and know that everyone is watching out for one another's safety, work environment and health is both a right and an obligation for everyone who is active within LKAB's operations.

A safe and healthy work environment includes the physical, social and organizational work environment in all workplaces. Based on a holistic perspective, we will work with people, technology and organization at the executive-management, group and individual levels.

3.1. The goal is safe and healthy workplaces

We set ambitious targets, measurable and timed goals, and we use key performance indicators for both preventative and follow-up measures to assess and continuously develop occupational health and safety work together with our collaborative partners and other stakeholders. Our targets include both our own personnel and those of suppliers/contractors working within our operations.

We will focus on four sub-areas, all of which are decisive for developing a safe and healthy workplace:

- Safety (serious accidents and incidents)
- Health (significant long-term work-related ill health)
- Inclusion (perceived inclusion in the workplace)
- Well-being (general health condition)

Each business shall, at all levels and based on its current situation and needs, develop and implement activities that are relevant to the workplace's work environment and contribute to the targets.

3.2. Each of us has a responsibility

To reach our objectives, we all have to contribute to the safety effort in the workplace and, based on the prevailing conditions and circumstances, make safe choices. At LKAB, safety always comes first and we begin all of our meetings with a safety review.

We shall have sufficient competence to be able to work safely and we take responsibility for communicating our expectations of acting in accordance with the guideline to everyone who works for us. We give a good introduction, instruct each other and ensure that everyone is secure in the knowledge that they can seek help when new situations arise or whenever they are uncertain. We choose safe working methods and contribute to a safe and healthy working environment.

Our behaviour and what we do is what creates a safe and healthy work environment. As a guide to how we should behave in relation to one another we have our guidelines, procedures and six ways to approach safety that we call Golden Rules. The six Golden Rules are:

- Acknowledge and praise correct/safe behaviour.
- Be a role model.
- Talk about safe and unsafe behaviour.
- Act when you see incorrect/unsafe behaviour.
- Stop and think before you act – What can go wrong?
- Never deviate from agreed ways of working.

To create local ownership of the golden rules, each business area and group staff will describe what the rules mean to us. In addition, all workplaces will discuss the implications of the rules when, for example, producing specific Workplace Rules.

3.3. Risk assessment within the work environment

We will systematically identify/survey, assess, manage, follow up and document work-environment risks to which people are exposed. We will take note of both general and specific risks and, subsequently, follow the Hierarchy of Controls[1]. Work-environment risk management shall be preventative and shall be conducted appropriately, based on the nature of the risks and in collaboration between employers and employees.

---

[1] See Procedure for Risk Assessment.

Our working method for risk management will include, but not be limited to:

- Risk assessments
- Safety rounds
- Consequence assessments in the event of changes in operations
- Reporting, investigation and management of risks, incidents, accidents and occupational illnesses.
- Workplace rules

Correct and rapid handling of deviations/deficiencies in the work environment is a prioritized activity within Safety First. We will investigate all serious deviations/deficiencies in the work environment and apply a consistent definition of risks, incidents and accidents[2]. We will report deviations as soon as possible and, when required, report these to supervisory authorities within the timeframe specified by them. Our ambition is to offer work adaptation i.e. alternative tasks instead of sick leave whenever possible and medically appropriate.

3.4. Suppliers and contractors

We will involve our suppliers/contractors in our work-environment management. When we purchase external services we shall have sufficient competency to be able to involve the supplier/contractor in our occupational health and safety effort in an appropriate way.

3.5. "The path of the work environment issue"

"The path of the work environment issue"[3] is based on the line organization's responsibility, but also on collaboration between employer and employee representatives in joint meeting forums to manage and follow up on work-environment issues.

Responsibility on the part of all roles and functions in our operations is the key to achieving our long-term objectives for a safe and healthy work environment. Issues which we, as individuals, can manage within our roles and responsibilities will be resolved as close to the workplace as possible. If this is not possible, "the path of the work environment issue" describes how the issue will be managed within the line organization.

---

[2] See definition risk, incident, accident.

[3] See "The path of work environment issues" in the management system

3.6. Compliance with laws and governance

We ensure compliance with national legislation and internal regulations with a structured approach that includes compliance with the law at least once a year. In cases where the guideline and national legislation have different requirements, we follow the stricter requirement.

To be able to maintain an overview of the status of our work-environment work, we use a common tool for systematic work-environment work called the SAM/SWE checklist.

Safety first and systematic work-environment management are based on line and organizational responsibility. We clearly document responsibility, within the line organization, with respect to work environment, plant safety and coordination. Where delegations apply, these shall be valid, known and accepted by the recipient.

3.7. Sanction system for the safety of all

When we observe incidents of repeated negligence in following our work-environment and safety procedures, the consequence will be legal action according to labour legislation. We apply a structured method to ensure consistent handling of incidents of negligence/non-compliance, for both co-workers and suppliers/contractors.

4. Guideline infringements

Follow-up of compliance is done within the line organization.

4.1. Report failure to comply with the guideline

Failure to comply with the guideline can be reported within the line organization, to the party responsible for the governing document or to another appropriate function. Failure to comply with the guideline can also be reported via LKAB's whistleblower system SpeakUp.

5. Yearly review

This governing document shall be revised on an ongoing basis, at least once yearly, with an aim to ensure that it remains relevant, has the intended effect and that it is adhered to within the LKAB Group.

Revisions that have an impact on the governing document's purpose, its scope or stated framework or in some other way affect LKAB shall be approved at the appropriate level. Revisions of this type shall be documented in a version log and the approved document will be assigned a new version number (Version X).

Editorial changes, including correction of spelling errors, updating of related governing documents, etc. which do not impact the document's purpose

and content, may be made upon approval by the party responsible for the governing document. Revisions shall be documented in a version log and the document will be assigned a new sub-version number (Version X.Y).

6. Additional guidance

Those who wish to discuss interpretation, application, etc. of this governing document are welcome to contact LKAB's work-environment functions.