



HSE Plan

Health, Safety and Environment

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1. Introduction

The EMS-Fehn-Group's (EFG) HSE Plan is developed and implemented in the intention to minimize the risks of accidents and incidents to people, equipment, material and the environment. EMS Log, as part of EFG (EMS-Fehn-Group), underlies these set out regulations and undertakes its utmost to grant the best services with highly experienced and skilled personnel and subcontractors.

Contractors and suppliers are the key to our business performance, and the capabilities and competencies to perform transportation on our behalf are assessed continuously. By monitoring subcontractors' performance it can be ensured that our image of safety and environmental friendly processes are aligned with these contractors and provided to – and beyond – the customer's satisfaction.

Generally, all applicable laws, provisions and regulations – national and international – are to be followed during the whole transportation process. Additionally, the environmental support as well as safe handling of cargo is mandatory for service providers carrying out transports on our behalf.

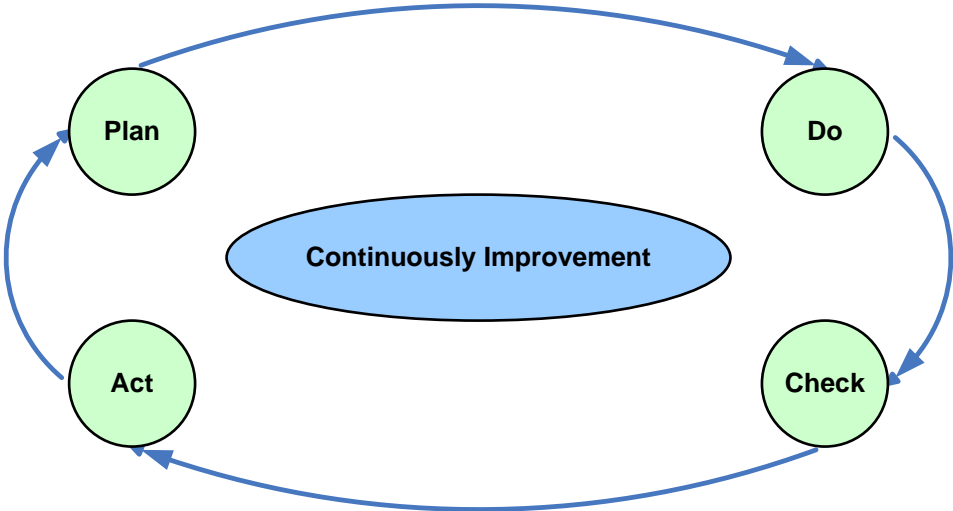
EFG provides all required resources for supporting the occupational health and safety, not only for employees of EMS Log, but all people involved in the whole transport chain. The prevention of damage to any person is the highest obligation to all contracted partners.

EMS Log will act in an ethical and socially responsible manner and within the laws, customs and traditions of the countries operating in. Our ambition is to avoid negative environmental impact, enhance positive effects and contribute to the sustainable development.

Daily behavior of each and every one of the persons involved in the transport chain is crucial for creating a solid reputation for our overall progress. By consistently implementing and living the obligations set out above, we are laying, together with our contractual partners, the foundation for our successful future.

2. HSE Objectives

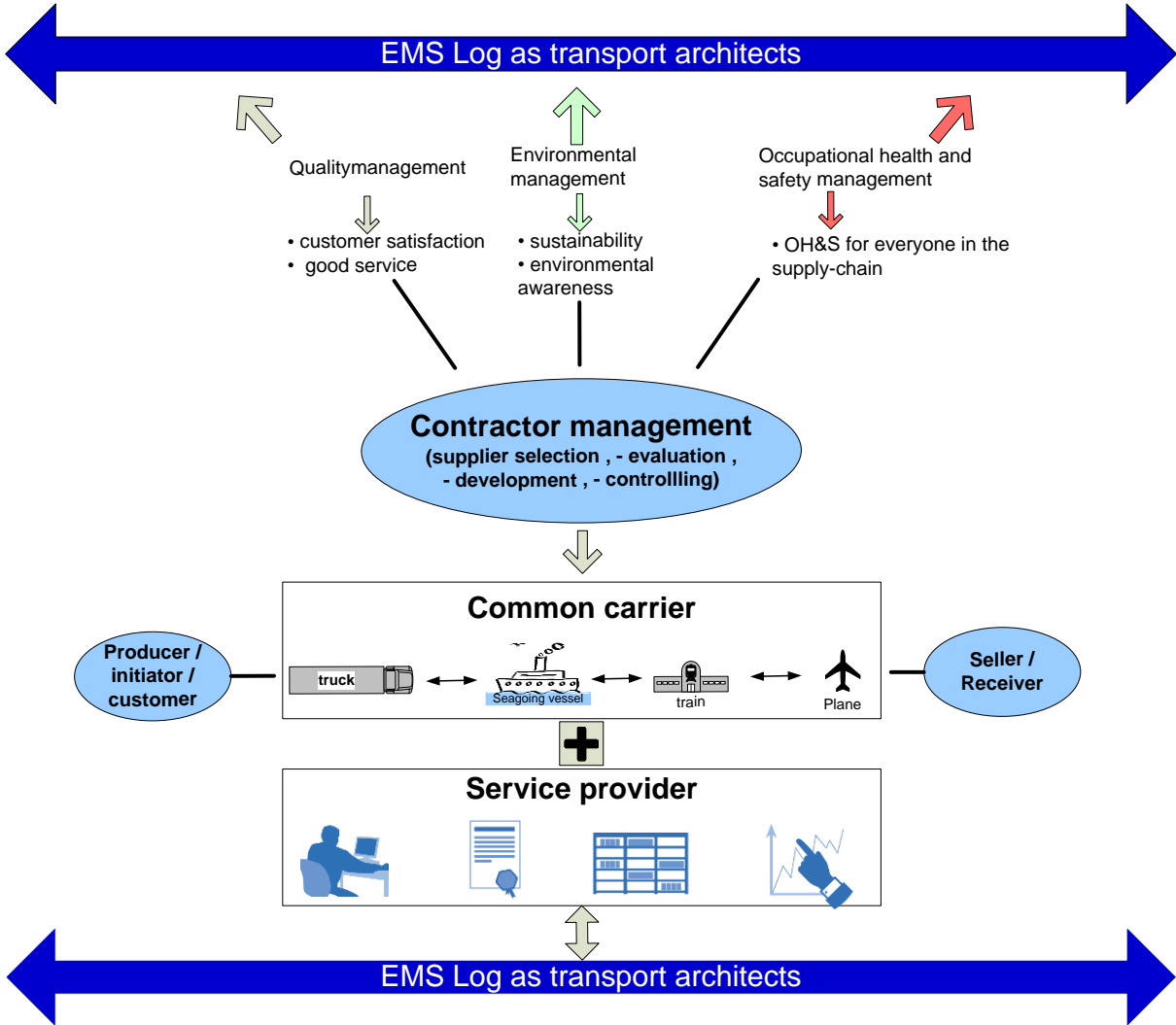
<u>Health</u>	<u>Safety</u>	<u>Environment</u>
<p>Psychial and physical health of all involved persons within the transport process</p> <p>Occupational health for all employees</p> <p>Health care / protection</p> <p>Health awareness</p> <p>Training and education of personal</p>	<p>Accident / incident prevention</p> <p>Safety working environment (infrastructure)</p> <p>Personal protective equipment</p> <p>Safety awareness</p> <p>Risk assessment</p> <p>Internal / external audits (control measures)</p> <p>Cargo stowage, securing and handling</p> <p>Training and education of personal</p>	<p>Pollution prevention</p> <p>Possible compliance with all relevant rules and regulations</p> <p>Possible reduction of emission</p> <p>Environmental awareness</p> <p>Training and education of personal</p>



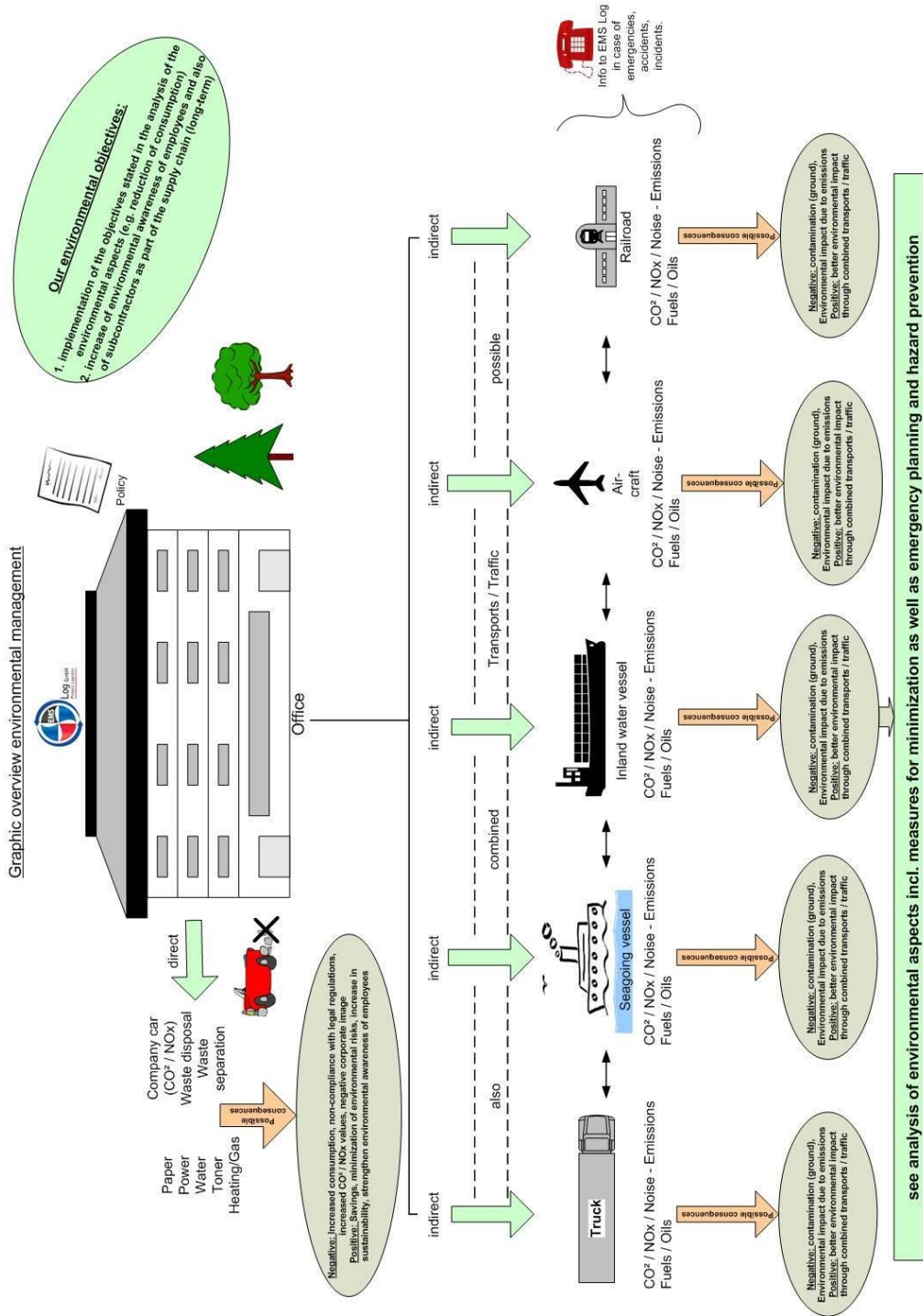
Our **WORKING SAFELY** manual is available under below link:

<https://online.flippingbook.com/view/802063361/>

3. Contractor management



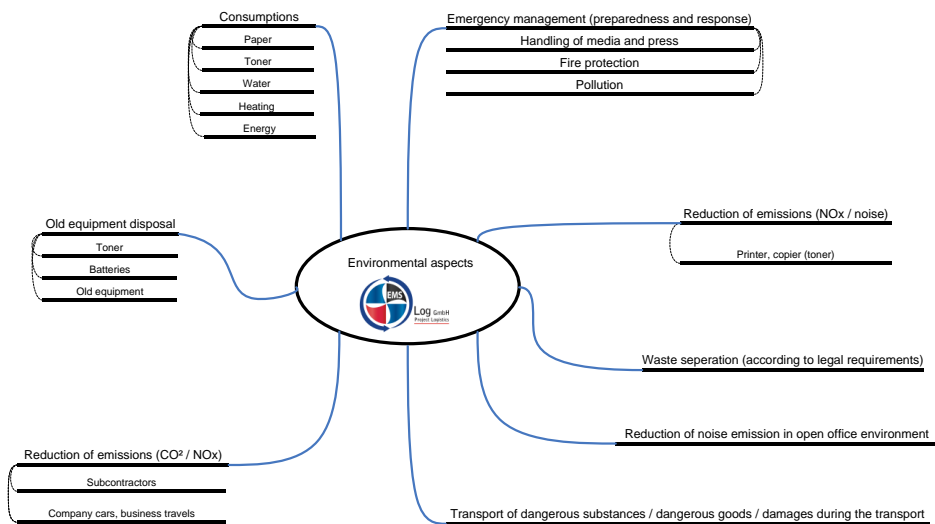
4. Overview of environmental management



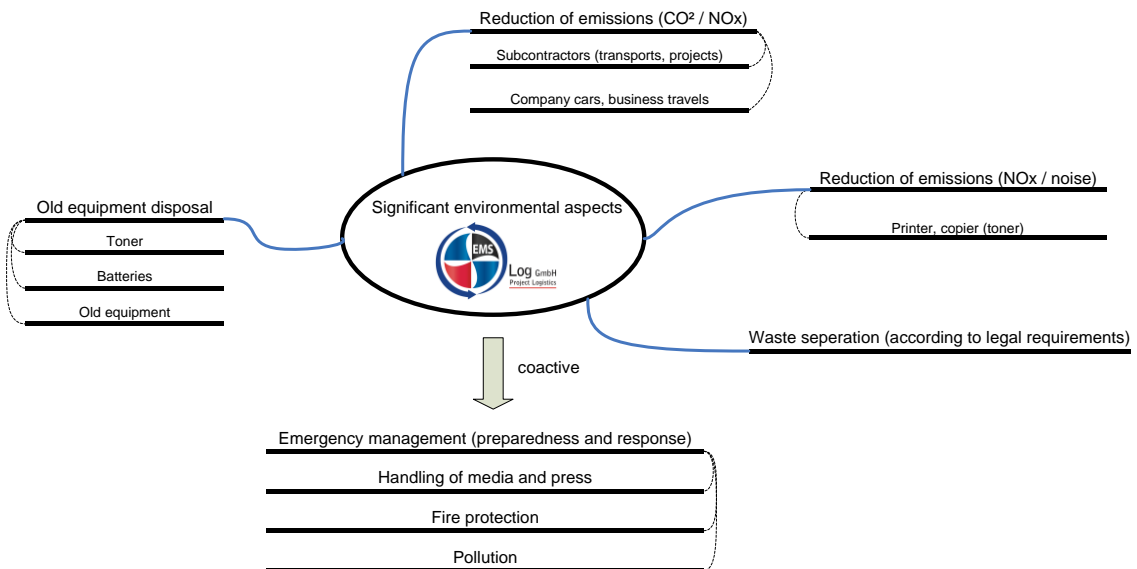
5. Environmental aspects

Our environmental objectives are essential to improve the sustainability and enhance the effect on the environment. Our environmental aspects differentiated into significant as well as direct/indirect environmental aspects and the resulting objectives are defined in our environmental program (“analysis of environmental aspects”). Our major goals are the continuous improvement of the environment within the complete supply chain and the decrease of our consumption rates.

Environmental aspects:



Significant environmental aspects:



6. Measures

Together with the employees of EMS Log a company policy has been developed and principles defined, to steadily improve the provided service to our customers. The employees have internalized these principles and incorporate same into their daily work. Additionally, to this EMS Log is certified according to EN ISO 9001:2015, EN ISO 14001:2015 and ISO 45001:2018 by Lloyd's Register Quality Assurance (LRQA) providing an independent proof and sign of high quality, environmental and occupational health and safety works in the company. The valid certificate can be found on our homepage.

All works of EMS Log are carried out according the "PDCA"-Cycle (Plan – Do – Check – Act). With this the services and works carried out are permanently monitored and evaluated in respect to fulfillment of the customer's obligations, contractual agreements and possible improvements for future transportations. Required resources – regardless if personal, financial or infrastructural – are provided by the management to improve the processes of the company and its subcontractors.

A company policy is established within EMS Log, defining the principles for keeping responsible handling and compliance with occupational health and safety as well as environmental protection regulations. These principles are to be applied throughout the whole transport chain.

To find the most suitable and trusting subcontractor for the customer, we have developed a system of selecting the subcontractors based on different factors, e.g. present certifications, experience and also references. Furthermore, each transport is monitored by the employees and any discrepancies are analyzed in respect to the root cause and the respective actions taken for correction. Additionally preventive measures are taken into consideration and control measures are set in place.

The selection and evaluation of the subcontractors is permanently updated and every transport is part of the general evaluation of all supporting and contracted companies. Additionally, the environmental support as well as safe handling of cargo is mandatory for service providers carrying out transports on our behalf.

As the main service of EMS-Fehn-Group is providing transport services in any ways, a group-based "risk assessment" has been developed. Depending on the means of transportation, this risk assessment has taken into account the most common risks and defined counteractions for preventing any injuries, damages and delays.

7. Risk Assessment

One of our objectives is to assess all identified risks to our personnel, the environment and the equipment. On basis of our risk assessment we have to establish appropriate safeguards and procedures to minimize the risks and to recheck if appropriate measures / actions are defined to prevent the harm/risk/hazard:

- a **hazard** is anything that may cause harm, such as chemicals, electricity, working from ladders, an open drawer etc.
- the **risk** is the chance, high or low, that somebody could be harmed by these and other hazards, together with an indication of how serious the harm could be

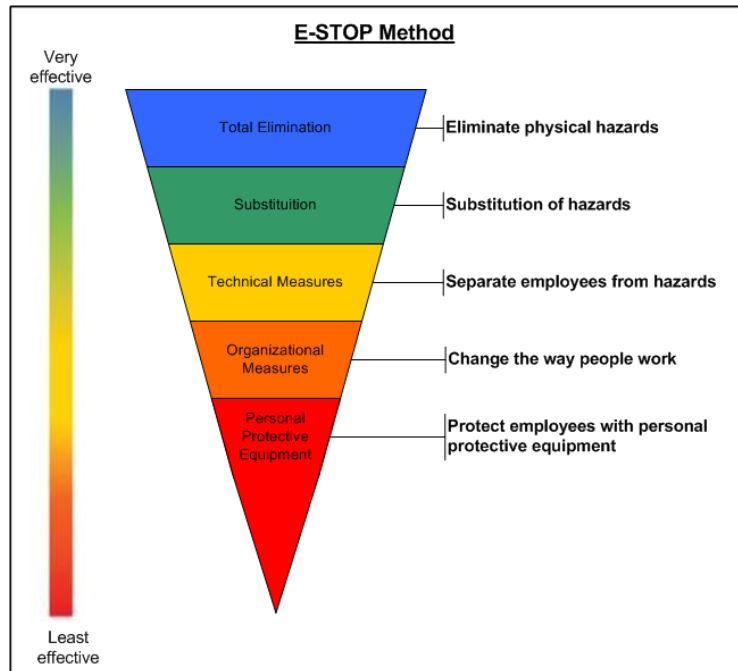
5 steps to create a risk assessment:

- identifying what can harm (hazard/risk)
- identifying who might be harmed and how
- evaluating the risks and deciding on the appropriate controls, taking into account the controls you already have in place
- recording your risk assessment
- reviewing and updating your assessment

		Effect / Severity			
		insignificant	slight	critical	kathastrophic
		General: no effect on our service provision Occupational health and safety: slight injuries or illness, no permanent damage caused to health Environment: no environmental effect, no measures / actions necessary 1	General: restricted effect on our service provision Occupational health and safety: medium-heavy injuries or illness, no permanent damage caused to health Environment: insignificant effect, no permanent effect, moderate actions / measures necessary 2	General: serious effect on our service provision, definition of measures/ actions Occupational health and safety: heavy injuries or illness, slight permanent damage caused to health Environment: moderate, significant effect, definition of actions/measures 3	General: significant effect on our service provision, immediate actions/measures Occupational health and safety: heavy injuries or illness, heavy permanent damage caused to health, dead, disaster Environment: immediate actions/ measures, significant effect, permanent damages to environment 4
Probability	very low (hardly imaginable; insignificant danger, preventable) 1	1	2	3	4
	low (imaginable; visibly and suppressible) 2	2	4	6	8
	medium (possible; visible and terminable by continuous control) 3	3	6	9	12
	high (high danger, in case measures fail - damage unavoidable) 4	4	8	12	16

Subject to the results the company' management takes the following steps: The measures are defined, using "E-STOP" method:

- E = total elimination
- S = substitution
- T = technical measures
- O = organizational measures
- P = personal protection means.



Taking into account the services provided by us, complete elimination and/or replacement is not always possible. Measures are usually defined applying the "TOP" method.

Following steps will be commenced by the management addicted to the evaluation:

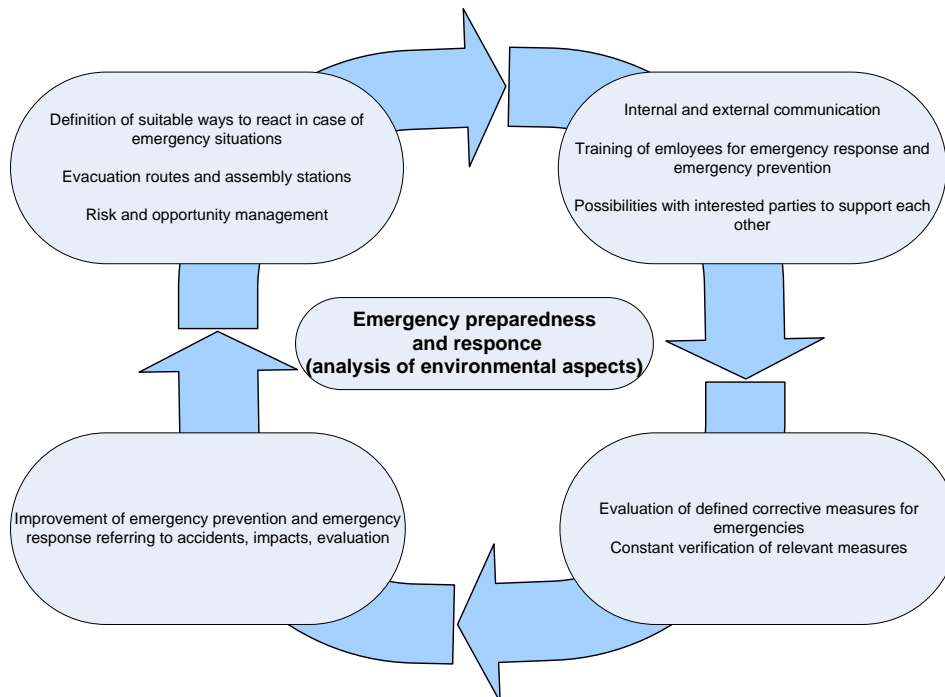
Risk evaluation	
1-2	No measures needed / no need for actions
3-4	Precaution is recommended / Appropriate measures if needed / observation of situation
6	Measures needed / additional need for actions (hazards) / checking feasibility – measures realizable? / in case of risk acceptance - measures are not necessary
8-16	Immediate actions necessary / immediate stop of operation (if necessary)

8. Emergency Scenarios

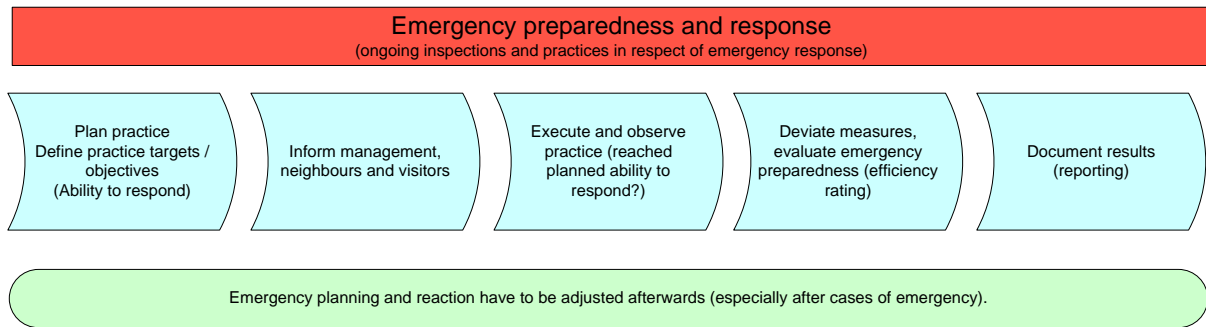
The specific emergency scenarios as well as the relevant measures / actions to react on same are recorded in the list of emergency scenarios as well as in the risk assessments. They are reviewed and, where necessary, updated, in particular after emergencies (including training in respect of the emergency situation) and at least once per year during the annual management review.

These emergency scenarios can cause the following consequences:

- Accidents, incident to workers (office and on-site)
- Pollution (caused by accident, water used for extinction)
- Negative image in the public press / media
- Lack of confidence in the legislator / authorities
- Consequences of the choice of subcontractors
- Loss of confidence (also among employees)



9. Emergency Preparedness and Response



We are a part of the supply chain and as a service provider we are the first point of contact for our interested parties, especially for our customers, in the event of accidents and / or emergencies. We may get notice of environmental and/or occupational health and safety incidents and emergencies that we directly or indirectly affect.





The relevant communication and information chain needs to be followed to respond to an emergency as quickly and appropriately as possible. The same applies to the ability to take measures and prevent and / or mitigate negative effects, in particular a negative impact on the occupational health and safety and on the environment.

The employees are briefed prior to proceeding to the work on possible emergency situations to prevent it and respond (response measures) and about the emergency chain and relevant contact persons.

Appropriate resources for training, further education and emergency / response measures training as well as resources in case of accident and incident to expand knowledge, acquire new knowledge and have adequately trained personnel available in emergency situations are granted.

The specific emergency scenarios as well as the relevant measures / actions to react on same are recorded in the risk assessments. They are reviewed and, where necessary, updated regularly and in particular after emergencies (including training in respect of the emergency situation).

10. Commitment to the Code of Conduct (Extract)

ETHIK- UND VERHALTENSKODEX – HAUPTINHALTE Diese Leitlinien sind verpflichtend für alle Mitarbeiter/innen der EMS-Fehn-Group!		CODE OF ETHICS AND CONDUCT – MAIN ITEMS The policy as well as the code of conduct are compulsory for all employees of the EMS-Fehn-Group!	
			
Respektiere jedes Individuum gleichermaßen Respect each individual equally	Vermeidung von Interessenkonflikten Avoidance of any conflicts of interest	Transparentes Vorgehen Transparency and Control	Unbestechlich und gegen Korruption Anti-bribery and anti-corruption

As all members of the EMS-Fehn-Group, EMS Log set out certain obligations to its employees and subcontractors regarding general behavior. These principles combined are to be seen as the “Code of Conduct”.

a. Antitrust

Competition can only develop freely when it is fair. EFG is committed to integrity and fairness when competing other in the market. Conduct that undermines competition is not tolerated. EFG will compete in an ethically justifiable manner within the framework of the antitrust and competition rules in the market.

Antitrust laws prohibit agreements or actions that might eliminate or discourage competition, bring about a monopoly, abuse a dominant market position, artificially maintain prices, or otherwise illegally hamper or distort commerce.

It is therefore explicitly prohibited, e.g. to make agreements dividing up markets, regions or customers, to make agreements not to compete, to discuss processes related to participation in tenders, or to exchange information about prices, market shares or other market conditions with competitors, customers and business partners in violation of the applicable law.

b. Corruption

Corruptions undermine economic development and free competition. It ruins reputations and exposes both companies and individuals to risk EFG is against all forms of corruption does not occur in any parts of the company's business activities.

The prohibition of corruption applies both to EMS Log as a company and to all persons acting on our behalf. In case of violations, it might lead to serious consequences both for the individuals involved as well as for EMS Log.

Gifts however – of material or immaterial value and nature – may be offered or accepted if the value is negligible or reasonable for the provided circumstances. In doubt the superior or management is to be consulted prior acceptance or offering.

c. Racism

EFG does not tolerate any kind of racist behavior in any way against any people, regardless their nationality, religion, culture or others. Violating against this will lead to drastically steps taken by EFG against the indicted person(s) and / or company(s).

d. Anti-bribery and anti-corruption (Bribery Act 2010)

Our organization will follow all applicable (national and international) laws and regulations as well as the bribery act 2010 (or latest edition).

11. Contact Details

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Annex 1: Company Policy


EMS-FEHN-GROUP QHSE-POLITIK
EMS-FEHN-GROUP QHSE POLICY

HAUPTTHEMEN UNSERER QHSE-POLITIK SIND:

- › Sicherheit und Gesundheit bei der Arbeit.
- › Kontinuierliche Verbesserung unseres Systems und unserer Dienstleistungen.
- › Einhaltung von nationalen und internationalen Gesetzen und Verordnungen.
- › Schutz der Umwelt und Erhöhung der Nachhaltigkeit.
- › Bereitstellung nötiger Ressourcen zur Dienstleistungserbringung und Zielerreichung.
- › Risiko-Management zur Minimierung oder Eliminierung von Risiken und Steigerung der Chancen.
- › Steigerung der Kundenzufriedenheit.
- › Fehlervermeidung / Lernen aus Fehlern.

MAIN TOPICS OF OUR QHSE POLICY ARE:

- | | |
|---|--|
| <ul style="list-style-type: none"> › Occupational health and safety › Continuous improvement of our system and our services › Compliance Management (national and international laws, rules and regulations) › Protection of our environment (enhancement of sustainability) › Providing necessary resources for our | <ul style="list-style-type: none"> services and our objectives › Risk management (risk assessments) to minimize or eliminate the risks and to enhance the opportunities › Enhancing customer satisfaction › Avoiding mistakes / learning from mistakes |
|---|--|

EMS Log GmbH offers logistic and consultancy services in the maritime, airfreight and forwarding sector. EMS Log was founded in 2013.

Our company policy (comprising quality, environment and occupational health and safety (OH&S) management) aims providing long-term safe and health friendly working environment, long-standing customer and suppliers relationship and satisfaction, ongoing improvement and development, optimal dealing with the natural resources, as well as growth of the Company.

Many years of experience, dedicated, duly trained and skilled employees, safe and health friendly working environment, examined and proven suppliers, conscious handling of the natural resources and internal and external parties defined within the context are the basis for business achievements and the related optimal provision of services to our customers.

Furthermore, the following principles have been established to be successful on the market and withstand the competition:

➤ **Consultation and Participation**

The processes and measures defined for the development, planning, identification and achievement of objectives, identification, and assessment of a threat, for the implementation and evaluation of the performance, as well as the required improvement measures (especially relative to the occupational health and safety protection at the workplace) impose the obligation on us to consult with and involve the employees (their representatives, where appropriate) at all levels of our Company.

➤ **Compliance with Legal Regulations and Other Requirements**

We obligate ourselves to comply with all applicable legal obligations (laws and regulations) and other requirements to the best of our knowledge and belief.

➤ **Creation of Safe and Healthy Work Environment and conformance with OH&S standards**

We commit ourselves to comply with health and safety standards to prevent and minimize work-related injuries, accidents and/or illnesses. Our target is to minimize the defined risks and to increase the opportunities in respect of occupational health and safety in connection with the context and objectives of our organization. In addition, we supply our employees with appropriate personal protective equipment (PPE) free of charge.

➤ **Environmental Protection**

We undertake to comply with the compliance obligations based on our services provided, as well as our defined context. Objectives are the protection of the environment, reduce the environmental load and affect it, to strengthen or form the awareness of our staff (including employees/workers), to use wisely the resources, to facilitate the sustainability and continuously review and improve the environment protection measures, as well as our environmental aspects.

➤ **Development, maintain and preservation of Knowledge**

Selective training and education of our employees by internal and external means shall ensure to stabilize existing acquaintance gain new knowledge and to preserve the knowledge in the company.

➤ **Provision of necessary Resources**

The management is responsible for assessing and providing necessary resources for fulfilling our services and compliance with occupational health and safety aspects as well as our environmental aspects.

➤ **Avoidance of Mistakes / The Use of Lessons Learned from Mistakes**

To avoid mistakes is fundamentally more important than to eliminate mistakes. Mistakes admitted in the past working operation are the essential experience and help us to optimize our working operations in the future as well as the occupational health and safety and the environmental awareness.

➤ **Risk and Opportunity Management**

The Company' management (with the employees involved) continuously defines, identifies, makes analysis, and values the risks and opportunities, as well as the resulting minimization or elimination of risks and the measures to enhance our opportunities.

➤ **Continuous improvement**

Our sequence of operations, processes, methods as also the integrated management system is under permanent assessment and is optimized continuously to minimize the risks of business disruption, dangerous and hazardous occurrences, and accidents within the service process.

➤ **Compliance with our ethical principles ("Code of ethics and conduct")**

We and our employees are committed to complying with our ethical principles, in particular respect for persons of any origin, respect for human rights, anti-corruption (anti-bribery) and data protection guidelines. We do not tolerate discrimination of any kind (including age, religion, origin, gender, colour, race, nationality), child labour in any form, harassment, and abuse in the workplace. Our business partners are also obliged to comply with our ethical principles accordingly. Possible violations (internal or external) must be reported to us immediately.

The above mentioned principals (guidelines) provide the frame of our company's operational and strategic objectives defined, realized and assessed by management in order to provide a customer-oriented and high quality service provision under consideration of our defined occupational health and safety as well as environmental aspects.

The Company' management is responsible for the introduction, implementation, maintenance, further development (ongoing improvement) and the efficiency of the integrated management system (IMS) and is furthermore taking accountability for the system.

This IMS is binding upon all employees of our Company and is applicable to all our employees / workers, because only if it is used by each employee / worker without limit, it is possible to provide a high-quality customer-oriented service, adhering to the required environmental aspects and OH&S requirements.

This company policy is made known and available to all employees without limit, and where necessary, is transferred at the disposal of the relevant stakeholders. The company policy will come into effect at the date when signed by the Company' management.

The company policy applies to the entire company of EMS Log GmbH (all locations).



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