

Departement:	IDPB (Veiligheid)	Doc nummer:	<b>PRO-1628</b>	
Proces: (Site)	Veiligheid & Gezondheid	Versie gepubliceerd:	1.0	
Subproces:	Veiligheidsbeleid	Uitgiftedatum:	3/03/2025	
Doc Eigenaar: niv. II	IDPB preventie-adviseur			

## Procedure

# Safety follow-up framework for executives

## 1. Purpose

With this guideline, we want to support our managers to respond uniformly and correctly to unsafe behaviour (actions). Depending on the severity, frequency, knowledge and whether or not conscious action, the response can range from coaching and adjustment to an admonition, suspension and dismissal. We wish to address contractors and our own employees in the same way in the event of unsafe behaviour.

## 1. Scope

This guideline applies to our own employees and contractors who are active on the Olen site. Unsafe behaviour under the influence of alcohol and drugs is not treated. For this we refer to procedure H3 PRO 01.

## 2. Definitions

### Conscious action

A conscious action is an action in which there can be no question of oblivion or a mistake, but which is carried out consciously. Conscious means that one knows (or should know) the correct working method based on training and/or experience, but does not use it. The motive for violating is, for example, laziness or saving time.

### Serious Violation

A serious violation is an action that increases the risk of an accident or incident for the person concerned or one of his colleagues in which a safety procedure or agreement (site and/or department) was not complied with.

## 3. Referentions

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NA

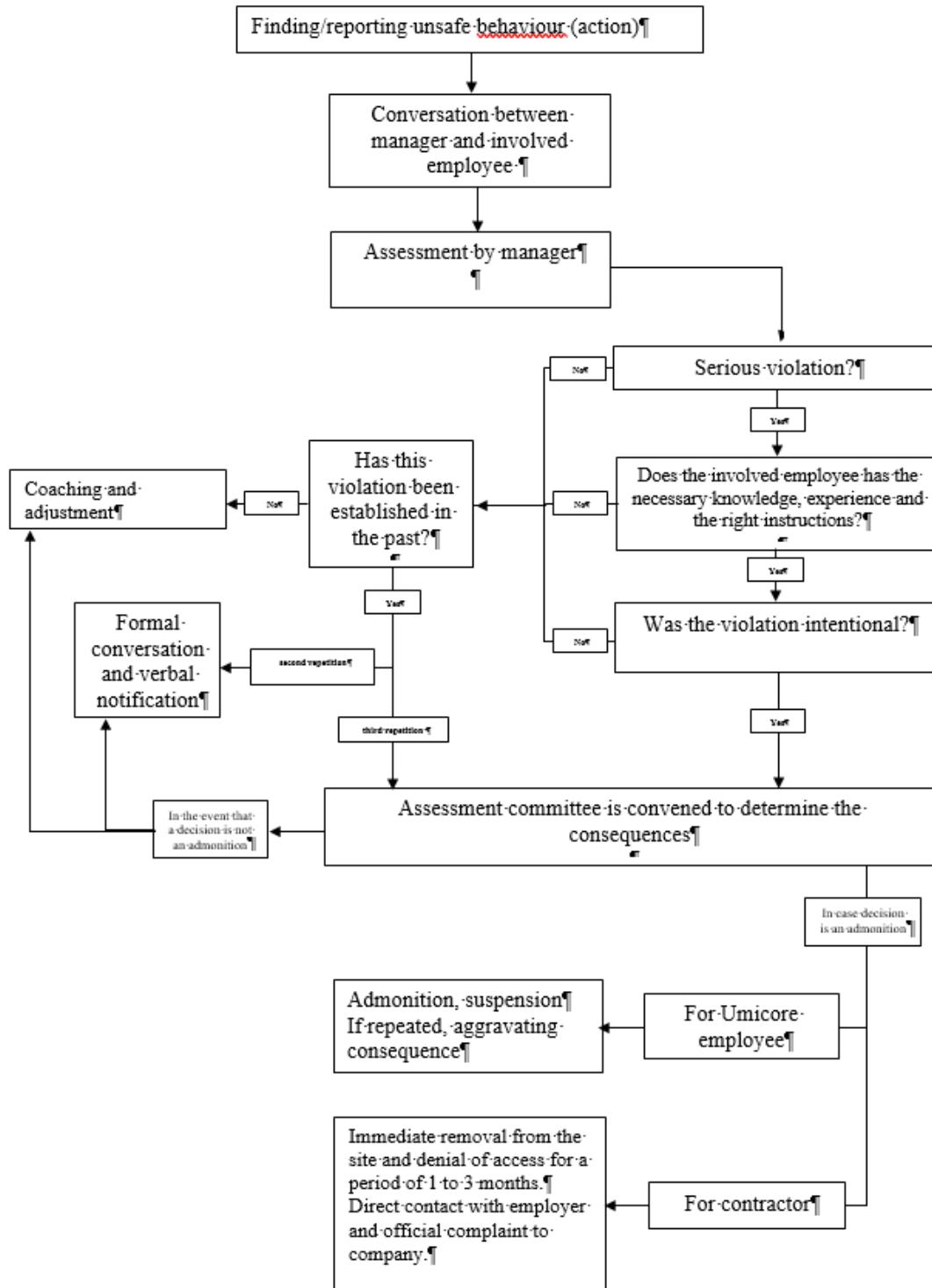
#### **4. Documents**

NA

#### **5. Responsibilities and authorities**

#### **6. Workflow**

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#### A. Identifying unsafe behaviour and first reaction

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It is the task of each of us to address a colleague or contractor when we observe unsafe behaviour. The aim is to remove the unsafe situation, make the colleague aware of his mistake so that he can correct himself and the activity can be continued. If we consider this appropriate, out of concern for the colleague(s), we will report this to the manager of the person addressed. It is recommended to tell the colleague addressed in a respectful manner that you will inform the manager. The manager can take further steps with the approval of the assessor. From the pursuit of an open safety culture, it is encouraged to report a serious violation to the manager.

#### **B. Conversation between manager and employee involved**

The manager talks to the employee and looks for the root cause of the violation.

#### **C. Assessment by the supervisor**

The supervisor assesses the unsafe behaviour. - Is it a repeated or serious violation? - Does the person concerned have the necessary knowledge, resources, experience and the right instruction? - Was the violation carried out deliberately? If the manager answers the three questions in the affirmative, he or she will take the initiative to discuss this with manager+1. After coordination with supervisor +1, he can schedule a meeting to determine whether or not a consequence should follow.

#### **D. Assessment of the safety violation**

- The supervisor immediately convenes at least the following persons (the composition of this is determined per BU and depends on the nature of the violation).
  - o the direct supervisor of the employee concerned (in the case of a contractor, the Umicore site manager or project manager concerned is part of the committee) to explain the correct context, the facts and the story of the employee.
  - o the prevention advisor or EHS manager (or his replacement) will contribute his correct knowledge with regard to safety and the applied procedures from an independent role. If relevant, the prevention advisor can have a conversation with the employee concerned before the meeting takes place so that the facts can be correctly framed and assessed.
  - o P&O coach for monitoring the consistent application of the consequence policy, also from an independent role.
- Depending on the assessment, the employee concerned will be given another opportunity to present his version of the facts.

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- Advice is given on whether or not to apply a consequence. This is determined on the basis of the seriousness of the facts and the history of the person concerned. The possible consequences and who makes the final decision are described in Appendix 1.
- If an admonition, suspension or dismissal is carried out, P&O will, if necessary, inform the employee representatives together with the manager concerned.

#### **E. Consequences in the event of a minor violation**

If one of the questions is answered negatively during the assessment (or its evaluation), the manager will provide the necessary coaching and adjustment (training, instructions or what the employee needs). If the employee commits this violation again, a formal interview and verbal warning will follow. If this verbal warning does not lead to safe behaviour, a consequence may be imposed, from the 3rd offence onwards (see D).

#### **F. Communication to the employee**

The manager, assisted by P&O, informs the employee concerned. A contractor is notified by the P&T purchaser.

#### **Appendix 1: Type of consequences**

The measure of the consequence is determined on the basis of the seriousness and/or frequency of the facts that have occurred. This means that in determining the standard of consequence, the successive steps do not necessarily have to be followed (address, verbal warning, verbal admonition, etc.).

#### **For contractors**

By definition, Umicore is not the employer of the contractor employee. We cannot therefore take measures that violate the employee's employment contract. However, we can deny an employee access to the site for a short or longer period of time. The employer is then obliged to find a solution to this in order to fulfil his assignment from Umicore.

The approach is to first address the employees in question in the event of violations by contractors. Only in the event of structural recurrence of abuses can it be decided to ban the company completely.

In the relationship between contractor and Umicore, the P&T department is the liaison person, so it will always have to be involved.

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Repeated unsafe actions: if the same employee of a contractor has to be removed from the site again within 24 months, this employee will be denied access to the site for life. This employee will also no longer be able to access the site on behalf of another contractor.

### Official complaint to contractor company

- If it is judged that a warning should be given, an official complaint will also be sent to the company concerned. The project manager/site manager contacts P&T to take the necessary steps.
- If it appears that several complaints have already been sent to the company in the context of undesirable behaviour, the cooperation with this company can be terminated.

### For Umicore employees

In accordance with the work regulations, depending on the severity and frequency of the failure, one of the consequences listed may be imposed:

addressing and adjusting undesirable behavior:

- Nobody is perfect, unconsciously we sometimes don't do the right things or not in the right way. This is human. That is why there is room to address each other and thus make adjustments in a positive way. We do this as soon as possible after the unsafe action has been identified. This is not without obligation.
- If you suspect that there will be a problem, contact P&O
- Adjustments can be made on the basis of a targeted training, toolbox, repetition of the introduction film,...

### verbal warning

- After repeated adjustments to undesirable behaviour, a verbal warning can be carried out. This is a formal moment when the employee concerned is informed that he/she has already been addressed repeatedly, but that it is up to him/her to adjust the behavior. This is the last conversation before moving on to an admonition.
- is based on the manager
- the manager conducts the conversation with the person concerned
- the manager sends an email to P&O Coach and manager +1, where information about the conversation is shared (date, content, follow-up, response of the employee, etc.).

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verbal admonition:

- is issued by the direct supervisor after consultation with supervisor +1 and P&O Coach
- must be done within 48 hours after informing P&O.
- written representation is drawn up in consultation with P&O Coach and senior manager and is signed by the supervisor  the reminder is sent to P&O Coach for storage in the personal file

written admonition:

- is issued by the direct supervisor after consultation with supervisor +1 and P&O Coach
- must be done within 48 hours after informing P&O.
- written representation is drawn up in consultation with P&O Coach and supervisor +1 and is signed by the supervisor and employee
- the reminder is sent to P&O Coach for storage in the personal file

Temporary suspension of the employment contract without retention of pay:

- after the conversation with the employee, a temporary suspension can be carried out in consultation with the manager, supervisor +1 and Site P&O manager
- must take place within 48 hours after informing P&O.
- the duration depends on the seriousness and frequency of the shortcoming
- The suspension will be included in a written admonition drawn up by the manager, manager +1 and Site P&O manager
- in a conversation with the manager +1 and Site P&O manager, the suspension is signed by the person concerned, manager +1 and Site P&O manager.

dismissal with respect to notice periods (whether or not to perform) or dismissal with severance pay:

- assumes Site P&O manager in consultation with the supervisor +1 and supervisor
- must be done within 3 working days after informing P&O.
- the supervisor+1 together with Site P&O manager conduct the dismissal interview
- P&O draws up the necessary dismissal documents

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Dismissal for serious cause:

- assumes Site P&O manager in consultation with the manager+1
- must be done within 3 working days after informing P&O
- The dismissal for serious cause is a consequence of a very serious shortcoming that immediately makes any professional cooperation between employee and employer impossible
- the manager+1 together with Site P&O manager conduct the dismissal interview
- P&O prepares the necessary dismissal documents