

SHE Standards

Safety, Health and Environmental
Protection Standards



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Foreword

Henkel strives to balance economic, ecological and social objectives to safeguard and strengthen our competitiveness in global markets. The Henkel SHE Standards address Safety, Health and Environmental Protection. They support Henkel's "Vision and Values" and Henkel's Codes such as the "Code of Corporate Sustainability." The SHE Standards are an integral element of Henkel's commitment to sustainable development.

To complement the standards, binding procedures describe relevant requirements in more detail. Guidance documents including best practice examples will support implementation. Irrespective of Henkel's requirements, compliance with applicable regulatory requirements is mandatory. In the event of any contradictions, local legal requirements must be followed if they are stricter.

The SHE Standards are applicable worldwide for the Henkel Group, and each of Henkel's affiliated companies must implement them with an appropriate management system. Specific regional and local procedures are necessary elements for implementation.

Henkel Management Board

I Management Process

I.1 Policy, Objectives and Programs

Goal

To ensure commitment to, and implementation of, a SHE management system, which is appropriate to the purpose of our organization, activities, products and services, as well as the continuous improvement of the SHE management system.

Policy

Requirements

- The Henkel "Vision and Values", related Henkel Codes and all applicable laws, rules and regulations must be followed.
- Additional policy elements may be added if required by business or local demands.
- The policy shall be communicated to all employees, and to other stakeholders on request.
- The responsible management team shall ensure that within their areas of responsibility an appropriate SHE organization is in place to fulfill the requirements of the SHE standards and that the relevant sections of the policy and SHE standards are understood and applied.

Objectives and Programs

Requirements

- SHE objectives and corresponding programs must be developed considering:
 - The policy
 - Legal compliance
 - Significant impacts
 - National/regional conditions
 - Technical feasibility
 - Economic viability.
- The programs shall include measures, responsibilities, means and deadlines for achieving the SHE objectives.
- Key performance indicators must be defined for activities with significant impact and monitored regularly to assess achievement of SHE objectives and effectiveness of the management system.
- Results must be communicated within the organization.

I.2 Verification

Goal

To ensure legal compliance and efficient implementation and maintenance of the management system.

Requirements

- Compliance with internal and external requirements must be monitored, including:
 - Identification and evaluation of relevant legal and regulatory requirements
 - Monitoring and assessment of relevant internal and external requirements and their changes
 - Identification of non-compliance and implementation of corrective actions
 - Communication of all relevant information concerning internal and external requirements and their changes to all staff concerned.
- The responsible management team must define the tools (e.g. inspections, audits, self-assessment) to supervise the implementation of the external and internal requirements.
- Audits shall be carried out by competent auditors, considering all relevant requirements imposed by Henkel, the authorities and external bodies, as well as by regulations.

The frequency and scope of such audits shall be based on the risks and relevance of the activities.
- The responsible management team shall review the organization's SHE management system on a regular basis, at least once per year to ensure its continuing suitability, adequacy and effectiveness. This review shall include assessing opportunities for improvement and the need for changes to the system, including the SHE policy and objectives. The review process must consider:
 - Process and system performance
 - Organization and responsibilities
 - Status of SHE objectives and programs
 - Results of self-assessments and audits
 - Status of preventive and corrective actions and related programs
 - Stakeholder feedback
 - Relevant changes in legal, external and internal requirements.
- The results of audits and reviews shall be communicated to all management concerned.

I.3 Preventive and Corrective Actions

Goal

To continuously improve the management system and processes and to avoid occurrence or recurrence of any nonconformities.

Requirements

- Any nonconformity with internal or external requirements must be evaluated and its causes analyzed.
- Necessary preventive and/or corrective actions must be defined and implemented within appropriate timeframes and in accordance with the risk level.
- The status of preventive and corrective actions shall be communicated to all management concerned.

I.4 Reporting and Communication

Goal

To implement appropriate communication channels at the appropriate organizational level, and to ensure a constructive relationship with stakeholders.

Requirements

- Effective channels for communication with stakeholders must be implemented.
- Specific performance data, related to product, production site, and business activity shall be monitored and assessed to identify risks and potential for improvement. Results shall be reported to the management.
- Employees and the public shall be informed regularly about progress and continuous SHE improvement.
- Data and information shall be provided according to Henkel Group requirements. These requirements take into account the information needs of our stakeholders.
- Each organization is responsible for communicating relevant issues to their stakeholders, including management, employees, customers, authorities and the local community.

I.5 Organization, Responsibilities and Training

Goal

To ensure that Henkel provides all necessary resources and defines transparent responsibilities in order to implement and maintain an effective and efficient management system.

Requirements

- An adequate organization shall be implemented, including the definition of responsibilities at all management levels.
- Responsibilities shall be clearly delegated, agreed between the employee and the company, documented, communicated and supervised.
- Workplace and function descriptions must include the relevant duties as well as the knowledge and qualifications necessary to fulfill these duties.
- SHE-related representative(s) must possess the necessary skills based on their education, training or experience and must be equipped with necessary resources.
- New employees shall be adequately informed about the company and trained in their job.
- Training needs must be identified and the appropriate training conducted.
- Adequate training records must be maintained.

I.6 Document Control

Goal

To ensure that documents and records are controlled systematically and that they comply with all relevant standards.

Requirements

- Written work instructions and procedures for operational control must be established and maintained, especially where deviations could result in high-risk situations. Documentation of the implementation of instructions and procedures must be maintained.
- Documents shall be understandable, dated (with revision dates), readily identifiable and maintained in an orderly manner.
- Documents shall be approved by authorized personnel, periodically reviewed and updated if necessary.
- The current versions of documents shall be available at all relevant locations.
- Obsolete documents shall be promptly removed or otherwise secured against unintentional use. Obsolete documents or records shall be archived in accordance with their specified archiving period.

2 Product Development

2.1 Design of Products

Goal

To ensure that research, development and product design systematically consider the impact on the environment, employees, and customers.

Requirements

- Product development must include the identification of all relevant legal and regulatory as well as internal and other external requirements.
- Product design must consider SHE aspects in addition to economic feasibility and customer needs. Product SHE aspects must include:
 - Efficient use of resources at key stages of the product's life cycle, including packaging
 - Safety of products and components, as determined by risk assessments
 - Reduction of emissions and wastes that result from the manufacture, use and disposal of products and packaging
 - Adequate labeling information on products and packages for customers and consumers.

2.2 Safety of Raw Materials

Goal

To ensure that appropriate knowledge of raw materials is available as a basis for safe products and safe handling and use.

Requirements

- It must be verified that raw materials comply with legal, customer and other requirements as well as Henkel-specific internal standards for the intended use.
- Raw materials used in Henkel products must be assessed in terms of their chemical and physical hazards to human health and the environment. Specific attention must be paid to highly hazardous raw materials.
- Required core information must be defined. Information sources include supplier information, Henkel databases, legal classification, labeling requirements and customer needs.
- On the basis of this information, appropriate risk management measures for storage, handling and use must be determined. This information must be communicated to the Henkel employees, contractors, contract manufacturers and licensees.

2.3 Safety of Products

Goal

To ensure that products are safe for their intended use in terms of human health and the environment.

Requirements

- Adequate knowledge must be compiled about the composition of the formulation. This comprises appropriate information on all ingredients based on chemical substances including potential reaction products in the formulation.
- A review of the regulatory compliance must be conducted for all products depending on the application and region/country for marketing (e.g. chemical inventory status).
- Appropriate information on ingredients, technical and safety data of traded goods marketed under a Henkel brand must be available and all regulatory and SHE aspects assessed by persons with appropriate knowledge and expertise.
- Product safety must be evaluated in a risk assessment process, which includes the hazards of the product ingredients and the exposure potential associated with the product use. The hazards of ingredients/products determine the scope and the details of the assessment process.
- The risk assessment process must include the prioritization of the necessary measures. The main elements are product classification, labeling and communication to customers in the form of material safety data sheets (SDS).
- If no local requirements apply, widely acknowledged international regulations have to be used as guidance.
- At a minimum, product classification, labeling and/or SDS of products must consider:
 - Information on hazardous properties
 - Instructions for the safe use and handling of products
 - Contact information for questions or emergencies.

This information must be provided to customers in regions or countries where regulations on product labeling and SDS preparation do not exist.

- If risks cannot be adequately managed by these means, further risk management measures must be considered. These may include:
 - Re-design of the product or process
 - Delivery to customers only if proper application of risk management measures is assured.
 - Withdrawal of the product from the market.

- Personnel involved in the handling and use of products must be adequately informed in advance about the hazards of the products.
- A systematic procedure must be implemented to ensure that relevant and updated information on Henkel products is provided to the customers.
- Information provided to the customers shall be reviewed regularly and upon receipt of any new or changed relevant information.

Animal Testing and Alternative Methods

Requirements

- Animal tests shall only be commissioned if legislation so provides and only after confirmation that no alternative approaches are available for obtaining the necessary safety information.
- In case of a decision to conduct an animal test, animal welfare considerations must be taken into account in conducting the test.
- Selection of test programs must follow the 3Rs rule (refine, reduce and replace animal tests) as the guiding principle. Test facilities must be approved by corporate Henkel professionals.

2.4 Market Launch, Product Monitoring, Product Review

Goal

To ensure that products in the market are monitored for feedback on safety issues and for the identification of evolving SHE issues.

Requirements

- Compliance with internal and external requirements must be monitored.
- Undesirable effects on human health or the environment must be monitored and assessed.
- Problems due to critical public debate must be identified and the impact of such discussions must be evaluated.
- Results of product monitoring must be considered in the product risk assessment.
- In case of any serious concerns about the safety of products, appropriate processes for product recalls must be implemented.

3 Operations (Supply Chain)

3.1 Purchasing and Suppliers

Goal

To ensure appropriate SHE performance of suppliers of goods and services.

Requirements

- Henkel requires that suppliers provide adequate information for the safe handling and use of their goods.
- For raw materials and packaging, information requirements must be defined by persons having appropriate knowledge and expertise, taking into account the requirements for storage, workplace handling, product safety, distribution, product use and disposal.
- For services and technical equipment, information requirements must be defined by the internal recipients.
- Suppliers must be evaluated according to their ability to meet Henkel's requirements regarding SHE performance.
- Suppliers who repeatedly fail to meet the defined requirements shall be identified and corrective actions shall be taken.

3.2 Storage

Goal

To ensure that the design and operation of storage facilities and equipment is adequate for the hazards and amounts of stored chemicals or materials.

Requirements

- The hazards associated with raw materials, intermediates, finished goods and other chemicals must be identified and appropriate risk management measures must be implemented.
- Storage facility design and storage conditions must be adequate to the hazards and quantities of stored chemicals or materials.
- Adequate safety measures must be implemented:
 - Availability of current safety information on the materials (e.g. SDS)
 - Package and container labeling that contains information about hazardous properties of the material
 - Segregation and/or separation of incompatible substances
 - Signposts for designated areas
 - Access control to stored toxic substances or liquefied gas
 - Appropriately marked traffic routes and storage areas

- Precautions against soil and water contamination
- An updated inventory list containing names, average amounts and safety information of the hazardous substances stored.

External Storage

Requirements

- Henkel defines storage requirements in its arrangements with contractors who provide storage for Henkel. Requirements shall consider local/regional circumstances and measures stated above.
- Qualified personnel must be authorized for selecting and monitoring contractors providing storage for Henkel.
- Contractual agreements must address legal compliance, defined Henkel requirements and the requirement to provide incident and accident information to Henkel.
- Contractors providing storage for Henkel must be monitored and evaluated, including accident and incident information.
- Contractors providing storage for Henkel who repeatedly fail to meet defined requirements shall be identified and corrective actions shall be taken.

3.3 Plant and Process

Safety Goal

To ensure that the design and the operation of production plants and manufacturing processes is safe for the employees, the public and the environment.

Plant Risk Assessment

Requirements

- Risk assessments must be carried out for all production facilities.
- Processes that may lead to serious incidents must be identified, and their hazards and risks must be thoroughly analyzed.
- Adequate corrective actions must be taken to minimize identified risks.

Plant Design

Requirements

- Utilized and/or planned processes and production technologies must consider SHE issues. Consideration of SHE issues must be documented including:
 - The assessment of safety and environmental impacts, including those to employees and the local community
 - The properties of all substances involved
 - The process conditions and process specifications with special emphasis on SHE requirements
 - The evaluation of any possible hazardous interactions between substances used in the process and between substances and construction materials
 - Pilot scale data shall be included in the entire plant design if feasible.
- Plant design shall consider:
 - Compliance with defined specifications from process development, legal and regulatory requirements, accepted technical standards and design codes
 - Provisions for emission, odor and noise reduction, wastewater treatment, waste disposal, soil and groundwater protection
 - Performance/updating of all relevant risk assessments
 - Provision of adequate technology, design, and engineering documentation
 - Facility security.
- Plant construction shall consider:
 - The establishment of qualified construction management, which is also responsible for SHE issues at the construction site

- The performance and documentation of equipment tests
- The provision of equipment documentation
- The development of maintenance, operating, pollution control and emergency procedures, and operator training requirements
- The communication and transfer of all information and documents to future management
- Training for future operating personnel.
- Pre-start-up safety reviews shall be conducted and shall consider:
 - All issues stated above under “plant design” and “plant construction”
 - Any efficiencies to be addressed before transferring responsibility to site management
 - Transfer record
 - Production trials to be conducted prior to production start-up as appropriate and where feasible.
- Procedures must be defined and implemented including appropriate measures addressing SHE, specifically:
 - Start-up, shutdown and regular operation of the processes
 - Raw material and product control, including laboratory safety issues
 - Clear labeling with SHE information of raw materials as well as intermediate and final products
 - Precautions for non-regular conditions, e.g. emergency situations, breakdown of SHE-relevant equipment
 - Reduction of energy and water consumption
 - Minimization of waste and emissions
 - Control of the disposal of waste and the release of emissions; data for evidence must be recorded
 - Prevention of soil and groundwater contamination.

Change Management

Requirements

A procedure for change management must be implemented:

- Prior to implementation, plant modifications (such as changes in processes, chemicals, technology, equipment and/or working conditions, including contractor work) must be evaluated for their impact on current risk assessments
- The results of the impact analysis must be addressed before starting the operation
- After serious incidents and after irregular shutdown periods, risk assessments must be reviewed and the results must be addressed before restarting the operation
- All modifications must be adequately documented.

Maintenance and Inspection

Requirements

- A systematic maintenance and inspection plan for all SHE-relevant equipment must be developed and implemented.
- Processes must be in place to ensure that work on safety-critical equipment is given first priority, including the identification, regular inspection and maintenance of such equipment.
- Maintenance and inspection personnel shall be qualified and competent, and they must hold all necessary licenses required by law.
- A safe work permit system must be implemented for dangerous work (e.g. hot work, confined space entry).
- Lock-out/tag-out procedures shall be implemented to prevent unintentional use during service or maintenance.

3.4 Production

Goal

To ensure that production processes are operated safely and with minimized impact on the employees, neighbors and the environment.

Requirements

- Operating procedures must be available at the workplace and must include:
 - Start-up, shutdown and regular operation of equipment
 - Handling of hazardous chemicals
 - Safe handling of equipment
 - Dangers for people and the environment
 - Protective measures and rules of behavior
 - Behavior in case of danger and emergency
 - First-aid measures
 - Accidental release measures and appropriate disposal.
- Henkel employees as well as non-Henkel production workers must be regularly instructed on applicable work-related SHE issues and operating procedures.
- Records shall be kept for all relevant plant operations (e.g. plant log files, records of SHE-relevant measurements).
- Regular inspections shall be performed by supervisors during shifts.

3.5 Contractors

Goal

To ensure that contractors working at Henkel sites comply with the Henkel requirements.

Requirements

- Henkel defines the requirements in its arrangements with contractors. Requirements shall consider local/regional circumstances.
- Qualified personnel must be authorized for selecting and monitoring contractors.
- Contractual agreements must address legal compliance, defined Henkel requirements and the requirement to provide incident and accident information to Henkel.
- Contractors are obliged to comply with the same requirements as Henkel employees while performing work at Henkel facilities.
- Henkel provides contractors with SHE information regarding the site, raw materials, production processes and products.
- Contractors' employees working at Henkel sites must be informed, instructed, coordinated and supervised conscientiously.
- If a contractor hires sub-contractors for work on Henkel premises, a general written agreement with Henkel is mandatory. In such a case, the contractor is responsible for forwarding all Henkel requirements and information to the sub-contractor.
- Unsafe work, deviations from acceptable safety practice and other misconduct by contractors must not be tolerated, and such misconduct shall be documented and discussed with the contractor.
- Contractors shall be monitored and evaluated, including accident and incident information.
- Contractors who repeatedly fail to meet defined requirements shall be identified and corrective action shall be taken.

3.6 Contract Manufacturing (Toll Production and/or Full Service)

Goal

To ensure that products manufactured by contract producers are given the same attention as any other Henkel products.

Requirements

- Henkel defines the requirements in its arrangements with contract manufacturers. Requirements shall consider local/regional circumstances.
- Qualified personnel must be authorized for selecting and monitoring contractors.
- Contractual agreements must address legal compliance, defined Henkel requirements and the requirement to provide incident and accident information to Henkel.
- Henkel provides the contract manufacturers with SHE information on raw materials, packaging materials, production processes and products.
- Contract manufacturers shall be monitored and evaluated, including accident and incident information.
- Contract manufacturers who repeatedly fail to meet these requirements shall be identified and corrective action shall be taken.

3.7 Transportation

Goal

To ensure that shipping of materials under Henkel's responsibility is conducted in a manner that is safe for human health and the environment.

Requirements

- Information requirements for the safe transportation of products, raw materials and waste must be defined.
- The SHE risks associated with the transportation of products, raw materials and waste must be evaluated and the appropriate risk management measures must be defined by applying the dangerous goods regulations.
- Risk management measures shall include:
 - Proper selection of the appropriate means of transport
 - Proper classification, packaging, marking and labeling of shipments
 - Safe product and raw material loading and unloading procedures
 - Appropriate training and instructions for staff and carriers.
- The cleaning of tank cars, tank trucks and reusable containers must take into account any SHE risks.
- Emergency response information and advice shall be made available on a 24-hour basis appropriate to distribution hazards.
- Henkel defines the requirements in its arrangements with carriers. Requirements shall consider local/regional circumstances.
- Qualified personnel must be authorized for selecting and monitoring carriers.
- Contractual agreements must address legal compliance, defined Henkel requirements and the requirement to provide incident and accident information to Henkel.
- Henkel provides carriers with SHE information on products, raw materials and waste.
- Carriers coming to and leaving Henkel sites are instructed, coordinated and supervised.
- Carriers are monitored and evaluated, including accident and incident information.
- Carriers who repeatedly fail to meet the defined requirements shall be identified and corrective action shall be taken.

4 General SHE Processes

4.1 Occupational Health and Safety

Goal

To ensure the health and safety of employees, contractors and visitors.

Requirements

- Preventing health risks in the workplace is an integral part of every Henkel manager's duties. Every employee is responsible and accountable for health and safety within the scope of their authority.
- Workplace risk assessments must be performed and documented for all workplaces at appropriate intervals and if conditions change:
 - Hazards must be identified (including mechanical and electrical hazards, hazards caused by physical impact; exposure measurement for hazardous substances)
 - Risks must be assessed (including comparison with exposure limits and regulatory requirements) and minimized
 - The health and safety of employees performing external work or performing activities at customer sites must be ensured
 - Preventive and/or corrective measures must be implemented, followed up and checked for their efficiency, and necessary training must be conducted.
- Adequate personal protective equipment (PPE) must be defined according to the identified workplace risks if engineering controls are not feasible. PPE compliant with the legal requirements or industry standards must be provided and used by the employees concerned.
- Visitors are instructed on the specific hazards of the site and the safety measures implemented, including the use of PPE.
- Good housekeeping must be ensured to prevent accidents.

4.2 Health Care

Goal

To ensure that adequate occupational health care is provided to employees.

Requirements

- Adequate access to occupational health professionals shall be provided.
- Prompt first aid treatment must be ensured by providing adequate equipment and trained personnel during all shifts.
- Occupational medical examinations prior to initial job assignment and at defined intervals (health surveillance) shall be performed in accordance with regulatory requirements and the specific hazards of the workplaces.
- Based on regional and national issues, general health promotion shall be provided and adequate programs shall be accessible to employees.
- Medical examinations must be documented. Medical records shall be securely stored and managed as confidential information.

4.3 Environmental Impacts

Goal

To ensure that relevant environmental impacts associated with Henkel business processes are analyzed and reported, and that measures for optimization are initiated.

Requirements

- Each facility must monitor and record a defined set of environmental data concerning:
 - Air emissions
 - Generation and discharge of wastewater
 - Waste generation and disposal
 - Energy and water consumption
 - Potential for accidental release
 - Soil or groundwater contamination
 - Very hazardous substances
 - Impact on the local community, including noise, odors and other complaints.
- The facility shall assess the environmental impacts of its processes, taking into account all environmental data and internal and external requirements, including legal limits.
- The facility shall promote the environmentally responsible behavior of Henkel employees.
- For the annual sustainability report, relevant data must be reported to the respective corporate department. Reporting is initiated by a corporate request. Reported data must be validated and confirmed by the operating Business Unit (BU) management.
- All reported data must be analyzed and the need for improvement measures or programs shall be evaluated.
- To meet the needs of all external stakeholders, the summarized data shall be reported in the Henkel Group's Sustainability Report.

4.4 Fire Prevention

Goal

To ensure that employees and assets are protected from fire and explosion.

Requirements

- Measures to prevent fires and explosions must be identified and implemented.
- The availability of adequate fire fighting equipment/installations must be ensured.
- An appropriate fire fighting management system must be implemented and integrated into the facility emergency plan.
- Structural fire protection and fire fighting measures shall be agreed with the local fire department.

4.5 Emergency Management

Goal

To ensure a proper response to any emergency at Henkel facilities.

Requirements

- A comprehensive emergency plan shall be developed and maintained. The plan must be appropriate to facility hazards and must consider the results of the risk assessments. The following main issues shall be addressed:
 - Emergency alarm / alerting
 - Emergency organization
 - Emergency response procedures
 - Emergency communication.
- Emergency plans shall be coordinated with local emergency services.
- The essential contents of the emergency plans shall be communicated to employees, contractors, visitors and, if appropriate, also to the local community and authorities.
- Sufficient escape routes must be provided and maintained.
- Training in and tests of emergency procedures shall be conducted on a periodic basis.
- Any identified deficiencies shall be communicated to site management and corrective actions taken.

4.6 Controlling and Reporting of Accidents and Incidents

Goal

To ensure efficient communication and investigation of accidents and incidents.

Requirements

- Any fatal accidents must be reported immediately to the Chairman of the Board, Henkel Group, and to the respective Executive Vice President, Henkel Group, of the operating Business Unit (BU).
- The Henkel SHEcom database must be used for the documentation and reporting of incidents or accidents.
- All incidents and/or occupational accidents must be adequately investigated and adequate corrective actions must be identified and implemented.
- The incident and accident data shall be summarized and analyzed. The need for improvement measures or programs shall be evaluated.
- To meet the needs of all external stakeholders, the data is summarized at the Henkel Group level and the results are reported in the Henkel Group's Sustainability Report.

4.7 Site Security

Goal

To protect Henkel's personnel and assets.

Requirements

- Premises must be secured against unauthorized access by measures including perimeter fencing, reliable access control systems, sign-in and sign-out practices for visitors and contractors, guarding and patrolling systems as appropriate.

4.8 Acquisitions, Divestments, Facility Closures

Goal

To ensure that SHE risks of companies or activities that are to be acquired or divested are appropriately assessed.

Requirements

- An assessment of SHE liabilities and performance must be conducted prior to the purchase of a business or the purchase or lease of property.
- Results must be communicated to the responsible project manager and the operating Business Unit (BU) manager as well as to the Acquisition Review Council (ARC) and any other corporate, BU and regional functions involved.
- Following an acquisition, an assessment regarding SHE concerns within 12 months is mandatory.
- The decision-making process regarding any divestment or facility closure, must include a SHE assessment at an early stage.

Credits/Contact Information

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Germany

©2022 Henkel AG & Co. KGaA

Edited by: Corporate SHE

Contact Information: Corporate SHE
Phone: +49 (0)211-797-3414
E-Mail: Clemens.schroeder@henkel.com

