

NORDIC FLANGES GROUP AB		Confidentiality <b>Internal</b>	DOCUMENT ID
DOCUMENT NAME <b>Crisis management policy</b>	ESTABLISHED BY <b>HållbarTillväxt</b>	APPROVED BY <b>The Board</b>	VERSION, DATE <b>1.0, 2023-01-30</b>

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### 1. Introduction

This crisis management policy has been adopted by the board and applies to all companies that are part of the Nordic Flanges Group AB, org. no. 556674–1749 (“Nordic Flanges Group”).

The crisis management policy addresses all employees in the company and describes the company's crisis readiness, how crisis work should be organised and who is responsible for what, in the event of an immediate crisis affecting the company's employees.

### 2. Background

Nordic Flanges Group offers high value to customers in the industrial sector by providing high-quality technology, solutions, and services to both the public and private sectors, globally.

The foundation for our value creation lies in profitable market positions in growing segments. The group's subsidiaries are long-term specialists in stainless steel forging, aluminium casting, and advanced metalworking. We provide our customers with industrial products from raw materials to processed and certified end products. Our industrial focus is on selected segments and trends within the industrial sector and this focus is based on specific market insight and technical expertise.

Sometimes critical situations can arise in our operations.

A crisis can be a great strain for both employees and employers. A prerequisite for us to succeed in such situations is that we have made the necessary preparations and that we have developed a well-planned contingency plan.

A crisis can either be linked to the workplace or personal life. Common crises connected to the workplace are e.g., accidents, employee death, fire, robbery, threats, and serious IT disruptions.

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Situations that are usually classified as crises in someone's personal life can instead be divorce, illness in the family and crimes against persons.

A crisis is usually characterised by the following:

- A threat to people and resources;
- Insufficient, uncertain, unreliable or rapidly changing information;
- Little time to react;
- Loss of control; and / or
- The need for resources is greater than the normal supply.

Regardless of the type of crisis that arises, we must be prepared and able to handle the crisis when it occurs.

In order to have the best conditions for this, it is important to have thought through various scenarios and stages in advance, so that it will be easier to make the right decision once the crisis is a fact.

### 3. Purpose and Objectives

Our crisis management policy aims to provide the conditions for being well-prepared to handle emerging crises and to minimise damage to both employees and our organisation in the event of a crisis.

The company's crisis management policy (the "Policy") establishes the scope and structure of the company's management and communication in the event of a crisis. The policy applies to all levels of the organisation and must ensure that we have the resources and capacity required to handle a crisis.

The company's priorities in crisis management

- Ensure the well-being of our employees.
- Protect the group's assets, brand, and shareholder value.
- Maintain services to our customers.
- Protect the environment where we work.

Crisis support is understood as the direct care of a person who is in a crisis and any subsequent measures. How managers, colleagues and other people react to a person who is in a crisis is of direct importance for how the crisis will be managed by the affected person in question.

In the event of a crisis, there must be predetermined procedures for who should do what in a crisis. The routines must be written down and linked to our crisis management policy. Whoever is responsible for certain measures in a crisis must be given access to resources and training to handle the task. It is the responsibility of management to carry out support efforts after disastrous events.

Each site must have a Crisis management team. The management of each site constitutes the Crisis management team. The site manager or the person he appoints is the chairman of the

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Crisis Management Team and is primarily responsible to convene the Crisis management team. In the event that the site manager is unable to lead the work, it is up to the group to choose a replacement to lead the work.

If someone on the Crisis management team becomes aware that a major crisis has occurred, they are responsible for calling the team together.

An emergency contact list with named persons for the positions is available at each factory and the head office in Stockholm.

Nordic Flanges AB, Själevad:

- The emergency contact list can be found in the folder Systematic fire protection work in the Site Manager's room
- The emergency contact list is available on-site in 6 places
- Documents are available digitally at G:\21\_ SAM\Alarm Guidance

Ferral Components OY, Kalajoki:

- The emergency contact list can be found in the folder Systematic fire protection work in the Site Manager's room
- The emergency contact list is available on-site in 6 places

Nordic Flanges Oy:

- The emergency contact list can be found in the folder Systematic fire protection work in the Site Manager's room
- The emergency contact list is available on-site in 6 places
- Documents are available digitally at <https://pelsu.fi/nordic-flanges/>

Within Nordic Flanges there is also a central crisis management team (C Crisis team). This must be convened if an event or crisis could significantly endanger the group's operations. The central crisis management team (C Crisis team) decides whether the incident or crisis should be handled by the local crisis management team or whether the central crisis management team (C Crisis team) should take over the responsibility.

The CEO or the CEO appointee is the chairman of the Crisis Management team and is primarily responsible for convening the Crisis management team. In the event that the CEO is unable to lead the work, the CFO or the CFO appointee to lead the work. If both the CEO and CFO are prevented from participating, it is up to the group to choose a replacement who will lead the work.

The emergency contact list with named persons included in the central crisis team (C Crisis team) can be found in the folder Systematic fire protection work at each factory and at the head office.

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Responsible for keeping the emergency contact list up to date is the HR manager at each company.

If necessary, the Crisis management team can invite additional people to become members of the Crisis management team.

The team decides whether and which interested parties should receive information internally that an event or incident may constitute a potential crisis.

## 4. Guidelines for crisis management

By following the guidelines below, we ensure that we manage the crisis in the best way possible to minimise its harmful effects.

### Preventive work

The most important crisis management work is to ensure that the crisis never occurs. We must therefore work with preventive measures, partly to avoid risks, and partly, if a crisis does arise after all, to ensure the capability to handle it and to minimise damage and lack of information in the event of a possible crisis.

Our preventive work includes:

- map risks for mental health issues and accidents
- have an active emergency response plan
- ensure that first aid equipment is available and in good condition
- ensure that employees know how to use first-aid equipment
- train managers in crisis management
- continuously check that employees are aware of our action plan for crises

The outcome for how well a crisis is handled is often determined by having those responsible practice handling crises. At least once a year, a crisis exercise must therefore be carried out at each management level.

Employees of the company, who manage staff, must have relevant training in crisis management.

The level of knowledge must be followed up and evaluated annually. Responsibility for training and competence in crisis management rests with the line manager.

All employees must also undergo annual training in this policy as well as fire and accident drills.

### Risk assessment and crisis management plans

- Comprehensive risk assessment.

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All companies in the Nordic Flanges Group must annually map the risks that may cause emergencies, those concerning the health and safety of employees, in addition to other types of crises that can affect production and the ability to deliver to customers.

Some events can directly damage our reputation. Among the generally identified emergencies are deaths, accidents with personal injuries, serious and acute illness, fire, electrical accidents, traffic accidents, threats and violence, victimisation, closure of parts of the business, environmental emissions, violations of applicable anti-corruption regulations, violations of applicable export regulations, IT- breakdown, data breakdown/intrusion and internal crime.

- Crisis management plan

A crisis management plan must ensure that the organisation is prepared and staffed with trained key personnel and that there are required procedures for a crisis to be handled satisfactorily.

Each company must establish detailed procedures for crisis management.

These must include the names and contact details of responsible persons within each company, together with more specific plans for handling various crisis scenarios. The document must be revised regularly so that the contact lists and routine descriptions are up to date.

The responsibility at local levels includes continuously ensuring that the employees are trained for their part in working with crises and first aid, that the equipment to be used is in good condition and that the employees are aware of the action plans that exist for different situations.

## If a crisis arises

If a crisis arises, the following procedures must be followed.

### The emergency phase

There are two parts to emergency crisis management:

#### 1. Rescue operations

Concrete action in a crisis

In a dangerous situation, always follow safety, fire, and rescue guidelines:

- Rescue those in danger, warn others and leave the area
- Call for help
- Limit, extinguish and prevent further damage
- Guide the relief assistance and tell them what has happened

When the directly life-threatening, emergency crisis is over, more people should be involved, and a more systematic way of working should be introduced with the help of the Crisis Management Team.

#### 2. Crisis communication

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When you notice or receive information about a crisis, you must immediately contact your immediate manager or someone from the Company's crisis management team. Gather immediate information about the incident and notify your manager or the crisis management team:

- What happened
- Where and when
- Who was involved
- Why
- Who has more information
- What has been done on site

As soon as the chairman of the crisis management team (CEO) or another member of the crisis management team receives information about the crisis, the crisis management team is responsible for communication. The local crisis management team is always responsible for informing and consulting with the C Crisis team or the person appointed by the C Crisis team.

#### After the immediate emergency

- Information and communication in case of crisis.

During an ongoing crisis, anxiety easily arises among the people concerned. It is therefore important to have coordinated communication during the process so that everyone receives the right information delivered in the right way and at the right time.

To prevent misinformation, all information to customers, employees, suppliers, authorities, press and media must be conveyed through the CEO or his substitute in a crisis. The CEO can then delegate the task further.

Contact with relatives must take place as soon as possible, but information to relatives about death or serious injury may only be given by the police or a doctor. We must never give out that type of information but must always leave that task to qualified professionals.

- Documentation in case of crisis.

When major crises and accidents occur, it is important to document the event; what happened, what was done and the chronology of events. It is important both to keep everyone informed and to be able to draw conclusions afterwards and see opportunities for improvement in the face of new crises.

- Follow-up after a crisis.

Keep the crisis group together and ensure that no one is left alone when a crisis has occurred. Everyone affected by a crisis needs support and help, even those who may seem collected or unconcerned. Make sure that everyone has the opportunity to express what has happened.

#### Reporting of incidents

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Incidents and events that could develop into a crisis for the organisation must be immediately reported to the crisis management team.

In some cases, there is a duty to report, for example to authorities or partners after an accident or a situation that involves danger. Check what the regulations look like in each case.

## 5. Contact

A person who has been exposed to a crisis and wants help or support should, in the first instance, turn to their immediate manager or someone else at the workplace. If the situation is of a more serious nature, the police or ambulance can be contacted instead.

Each company has a designated crisis management team. If a crisis occurs, someone in this team must be notified to immediately initiate the measures needed to minimise damage to people, facilities, operations, or the surrounding environment.

## 6. Liability

All employees are obliged to comply in all respects with the laws, regulations, authority requirements and guidelines that affect crisis management. Violating the guidelines may result in disciplinary action. Ultimately, it is Nordic Flange's managers who are responsible for the guidelines being communicated to employees, as well as to affected external parties to promote a wider knowledge of and use of the guidelines.

If a serious accident or crisis occurs, the Company's board in the respective country must be contacted immediately. It is ultimately the CEO's responsibility.

## 7. Associated documents

Business continuity plan  
Work environment policy  
Information Policy  
HR policy  
Risk analysis and Risk policy

## 8. Exceptions

Only the Board of Directors can approve any exceptions to this policy.

Stockholm on 30 January 2023