



June 2022

Policy

Safety is a core value at GCT USA. We are committed to safeguarding employees, contractors and assets, customers and vendors, the community and the environment at all times. We are dedicated to providing proper training, procedures and tools to ensure a safe and secure working environment which minimizes the risk of an injury or accident, and handles our customers' containers responsibly. We believe that safe operating practices are a shared responsibility among management, employees, contractors and visitors (collectively referred to as "workers").

To accomplish these goals:

- We will** provide a safe, secure and healthy environment.
- We will** promote safety as a core value.
- We will** train our employees to work safely and provide them with the equipment and information necessary to do so.
- We will** ensure that all work is performed safely, no matter how important or urgent. *We respect the right of employees to refuse to do work where unsafe conditions exist.*
- We will** ensure a continued and open dialogue with all business partners.
- We will** focus on the continuous improvement of our operations. *We will integrate an effective Safety Management System (SMS) that ensures a process of continual and pro-active improvement through a collection of processes, procedures, and programs that ensure a formalized approach to system safety through risk and hazard analysis and safety assessment.*
- We will** comply with all laws, regulations, and industry standards.
- We will** cooperate with all regulatory agencies.
- We will** prevent and investigate the occurrence of unsafe or illegal acts. *We are focused on reducing both the probability and severity of incidents.*
- We will** prepare and react promptly to an emergency situation.

Responsibility and Authority

The President of GCT USA has the responsibility and authority to implement this Policy, including the development and approval of related Company policies, procedures, and guidelines. The GCT USA Safety Council serves as a resource and facilitator for the Safety Leaders of each GCT USA terminal.

Each Manager will:

1. Demonstrate commitment to this Policy and dedicate resources to the management and success of a safe workplace.
2. Ensure information, instructions, direction and support is communicated to all supervisory staff in order to protect the health and safety of all the workers.
3. Reinforce and support adherence to all GCT USA Safety Policies as well as compliance with all applicable safety regulations and laws.
4. Monitor departments for their individual safety performance.

Each Supervisor will:

1. Implement and enforce GCT USA Safety Policies and all relevant Health and Safety regulations.
2. Ensure that all workers understand the importance of working in a safe manner and that workers use protective devices and procedures as required.
3. Warn all workers of potential or actual risk and advise workers how to minimize said risks.
4. Ensure workers that require First Aid know when and where to report.
5. Ensure all accidents are reported, investigated and corrective actions implemented to prevent similar accidents in the future.
6. Carry out regular inspections of the workplace.
7. Demonstrate commitment to this Policy.

Each Worker will:

1. Read, understand and comply with GCT USA's policies and procedures.
2. Wear personal protective equipment as required by GCT USA's Policy and/or Regulation.
3. Notify their supervisor(s) of any unsafe conditions or acts that may be of danger to other workers or themselves.
4. Report all accidents and injuries to their supervisor(s).
5. Take reasonable precautions to protect the safety of others and themselves.
6. Demonstrate commitment to this Policy.



John Atkins
President, GCT USA