

SHIN-ETSU HANDOTAI EUROPE LIMITED

OCCUPATIONAL HEALTH AND SAFETY POLICY

The Company and its top management recognise the importance of the management of health and safety in the workplace and are committed to the welfare of the employees and others. This policy is a statement of commitment to conduct business in a manner that as far as is reasonably practicable reduces the risks to the health and safety of its employees, visitors and the public, or of damage to the environment.

The scope of Shin-Etsu's activities is defined with BPD 7 Environmental and Safety Management Systems. The manufacture of silicon wafers presents a broad spectrum of hazards ranging from common workplace activities e.g. use of work equipment, manual handling to highly specialist processes capable of causing significant injury and harm e.g. the use of corrosive chemicals and gases. These hazards shall be identified and where possible eliminated, reduced or controlled through a system of risk assessment and the implementation of risk control mechanisms. Specialist hazards shall be reviewed by technical groups using advanced risk assessment techniques such as HAZOP and FMEA.

The company is committed to providing its workers with safe and healthy working conditions, to the prevention of injury and ill health from its work activities and to continual improvement of health and safety management and performance. Occupational health and safety objectives and targets shall be set at plant and department level and shall be implemented through safety improvement plans. The objectives will be reviewed at the EHS Department plant performance review.

All legal requirements relevant to occupational health and safety shall, as a minimum standard, be complied with. Where appropriate, the minimum legal standards shall be exceeded in line with what is considered best practice. In Implementing this policy, the Company shall have due regard to the requirements of the following:

HSG 65 Successful Health and Safety Management
ISO45001 Occupational Health and Safety Management Systems
EHS Department documentation as found in Q Pulse

The Company's organisation and structure shall be arranged so that persons with management responsibilities shall also be made aware of their health and safety responsibilities. All employees shall be provided with adequate training to carry out their job safely and understand their health and safety responsibilities. Communication with employees will include consultation either directly or via Representatives of Employees Safety on matters related to their health and safety. Mechanisms shall be provided to ensuring that employees have the opportunity to raise issues relating to their health and safety and can participate in their resolution.

Contractors and visitors to the site shall be provided with adequate information and instruction to work safely on the site for the protection of themselves and

employees. Checks shall be made to ensure Contractors meet acceptable health and safety standards

All accidents, incidents and cases of ill-health that are reported shall be investigated and effective corrective and preventative actions put in place. The company shall provide access to occupational health professionals for employees where injury or illness may be as a result of a potential exposure to a hazard within the workplace. Occupational Health surveillance will be provided to those employees deemed most at risk from these hazards.

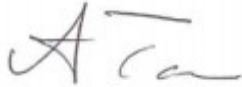
This policy will be reviewed periodically to ensure that it remains relevant and appropriate. The safety and environmental management policies are available on the Company website www.sehe.com or on request.

Signed on behalf of the Board of Directors

Master copy signed

Date 18/Oct/2019

A. Tamura



Managing Director