



CORPORATE POLICY

Subject	Department	Number
Health and Safety	Dana Worldwide	HS1 – 001A
	Responsible Officer: Senior Vice President of Human Resources	Date of Last Revision: March 2020
		Approved By: Executive Leadership Team

1.0 Statement of Policy

Dana believes that the health and safety of its employees, contractors, visitors, and the public is of the highest priority and importance. The purpose of this procedure is to define Dana's Health and Safety Policy as committed by the Executive Leadership Team. This policy is developed in support of the fundamental Principles covered by Dana's Standards of Business Conduct.

2.0 Scope

The scope of this procedure covers global operations of Dana and its wholly owned subsidiaries.

3.0 Responsibilities

The company's officers and employees shall endeavor at all times to conduct the business of the Company in compliance with this policy and all applicable laws and regulations, and to any other health and safety requirements to which the company has subscribed.

This policy has been adopted under the authority of the Executive Committee and it is expected that all employees will comply with the terms of this policy. In support of this policy, executive leadership will ensure that accountability for health and safety is incorporated into, and made an integral part of, the key performance measures of Dana's operations and management team.

4.0 Procedure

Dana is committed to a health and safety continual improvement process to ensure that each employee, contractor, and visitor to our sites has a safe place of employment. This commitment is realized at each site through:

- 4.1 Adequately staffed, trained, and qualified health and safety professionals with organizational authority to develop, implement, and sustain the health and safety policy.

- 4.2 A formal health and safety management system consisting of policies, procedures, and formal improvement plans with evidence of sustained implementation and continual improvement, to include:
 - 4.2.1 Compliance with corporate health and safety initiatives;
 - 4.2.2 Identification of, access to and compliance with health and safety legal requirements and to other requirements to which we have subscribed, including related industrial standards or customer requirements;
 - 4.2.3 A formal risk-based health and safety planning, evaluation, and control process with a focus on the prevention of injury and ill health;
 - 4.2.4 Defined and documented roles and responsibilities as it relates to implementing the health and safety management system;
 - 4.2.5 Identification of training needs and execution of training plans to assure full understanding of expectations and effective implementation of the health and safety management system and the contents of this policy:
 - 4.2.5.1 Training frequency to include both initial and periodic refresher training, but no less frequent than is legally required.
 - 4.2.6 Health and safety objectives and targets with identified responsibilities and timelines for implementation to be defined as part of the annual business planning process;
 - 4.2.7 Retention of records to demonstrate conformance to the requirements of the health and safety management system and compliance with legal requirements; and
 - 4.2.8 A process for measuring and monitoring system performance to include:
 - 4.2.8.1 Auditing of system conformance to policy, procedures and safety objectives / initiatives;
 - 4.2.8.2 A formal incident investigation process to identify root cause and support effective corrective and preventative actions;
 - 4.2.8.3 Communication of performance to employees; and
 - 4.2.8.4 Management of change – reacting to conditions when data supports the need for change.
- 4.3 Formal disciplinary action process owned by the Human Resources function to ensure that appropriate action is taken in the event of a violation of the law or of Dana's policies and procedures;
- 4.4 Dana sites will cooperate fully with regulatory agencies in a courteous and professional manner and it is our intent to provide access to company facilities without the use of a warrant;

- 4.5 Dana’s health and safety policy statement shall be posted at each site for public and employee view and shall be available to all parties interested in the performance of our health and safety management system;
- 4.6 Periodic review for continued relevancy and appropriateness; and
- 4.7 Oversight of, and guidance for, Dana’s overall health and safety management system by corporate and regional management.

5.0 Non-Compliance

- 5.1 Dana Incorporated and each of its subsidiaries is obligated to conduct Dana’s business in a legal, ethical, and responsible manner with respect for human rights. Every Dana employee, regardless of position, shares in the responsibility for assuring that Dana’s business is conducted in a manner that satisfies Dana’s Standards of Business Conduct and this policy.
- 5.2 All employees are strongly encouraged to notify their plant manager, general counsel, or the company’s confidential Ethics Point reporting service of any adverse health or safety issues which have not been addressed in a manner consistent with this policy.

6.0 Associated Documents

- 6.1 Dana’s Standards of Business Conduct
- 6.2 Dana’s Health and Safety Policy Statement

Version	Issue/ Revision Date	Description	Approved By
1.0	June 2012	Initial Release	
2.0 – Rev1	April 2017	Revision	
3.0 – Rev2	March 2020	Revisions to Section 1.0 “executive Leadership Team” and added “contractors” to Sections 1.0 and 4.0	Senior Vice President of Human Resources