



## OCCUPATIONAL HEALTH AND SAFETY POLICY

Version:	01	Effective date:	1 February 2022
Applicable to:	All employees	Control (C):	yes
Approved by:	Board of Directors	Date of approval:	28 January 2022



## Introduction and Purpose

Elementum Energy Group (“**Elementum**” or “**Company**” or “**we**”) commits to powering a transition to a carbon-free society with affordable, reliable, sustainable and modern energy. It also commits to ensuring that our environmental, societal, economic and governance decisions benefit future generations.

We believe that fulfilling our commitments helps address global challenges and achieve UN Sustainable Development Goals (“**SDGs**”).

We believe that a healthy and safe work environment is at the core of our corporate principles and values, being a prerequisite for the smooth operation of the Company.

Our commitment to fostering a safe culture extends beyond maintaining a healthy and safe working environment to the physical and psychological health and wellbeing of our employees.

The purpose of this occupational health and safety policy (the “**Policy**”) is to set out the core principles that we define as crucial in day-to-day activity for ensuring a healthy and safe work environment, eliminating hazards, reducing health and safety risks, promoting the physical and psychological health at the workplace and raising awareness among employees and others who may be affected by our business-related activities.

## Scope

This Policy applies to all Elementum employees, regardless of their department and the position they hold.

Where Elementum participates in existing joint ventures as a non-controlling shareholder, Elementum will make the other shareholder(s) specifically aware of the significance of this Policy to Elementum and encourage such shareholder(s) to implement this Policy or one of a similar standard in the joint venture.

For new minority joint venture cooperation under consideration, Elementum will strive to commit the other shareholder(s) to adopt this Policy or one of a similar standard for the joint venture.

Under this Policy, Elementum may develop a number of procedures and instructions to implement and enforce the obligations undertaken and bring the Policy in line with the different local laws and regulations applicable to Elementum.

## Policy Statements

### OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

We are committed to offering the best conditions for all our employees, continuously improving our safety management framework, systems and processes and never compromising our safety standards for expedience.

We pursue our stated goals by striving to meet and exceed all obligations under applicable legislation, relevant international standards and voluntary commitments undertaken by Elementum and by fostering an enthusiastic commitment to health, safety and the environment among our employees, contractors and others.

Our Integrated Management System (IMS) provides a structured implementation of the ISO 45001 Occupational Health and Safety Management System by:



- ensuring that the OH&S management system is an integral part of IMS and core operations, meets legislation requirements and stakeholder expectations, be they shareholders, employees, customers or society at large;
- encouraging both management commitment and employee involvement to allow consolidation of the culture and reinforcing the importance of OH&S within the organisation;
- including OH&S strategies in the annual business planning process and setting annual measurable OH&S objectives for all operations to ensure an OH&S culture, continuous improvement and compliance with requirements;
- identifying, assessing and controlling OH&S risks and opportunities from known causes of occupational injury and ill health associated with workplace processes and the working environment, investigating cases of work-related injuries and ill health to prevent recurrence;
- providing facilities, equipment, resources and services to enable employees to perform their duties safely;
- performing internal and external audits and validation of OH&S systems, procedures and performance through analysis of organisational data and benchmarking with industry peers; and
- communicating and sharing successful practices and lessons learned from incidents, to continually raise awareness and act preventively.

#### EMPLOYEE OCCUPATIONAL HEALTH & SAFETY COMPETENCY

At Elementum, all employees commit to health and safety. We expect all of them to be aware of such commitment and assume responsibility for maintaining and safeguarding health and safety conditions in their work environments.

To ensure that all employees at every level of the organisation understand and commit to OH&S principles and support a "zero harm" culture, we:

- develop employee OH&S competencies through effective training and leadership in line with position accountability and responsibilities, including individual obligations to personal safety;
- provide a mechanism for consultation and participation of employees in the decision-making process relating to health and safety initiatives; and
- align the requirements of OH&S with all other business objectives, reflect OH&S expectations within position descriptions and ensure that they are subject to performance measurement programs.

#### OCCUPATIONAL HEALTH & SAFETY REPORTING

We commit to transparently reporting our OH&S performance to the public, institutions and other stakeholders in our Annual Report (Sustainability Report).

#### **This Policy meets the requirements of:**

- Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187);
- ILO standards-related activities in the area of occupational safety and health: An in-depth study for discussion with a view to the elaboration of a plan of action for such activities (Report VI, International Labour Conference, 91st Session, 2003);
- International Finance Corporation's Performance Standards (2012);
- The International Bill of Human Rights and IFC Sustainability Framework (2011);
- Environmental and Social Policy of European Bank for Reconstruction and Development (2019); and
- UN Sustainable Development Goals and national legislation.



**Members of Elementum Energy Group include:**

Elementum Energy Limited; and  
Subsidiaries of Elementum Energy Limited.

**Body/Function/Individuals**

**Roles and Responsibilities**

Board of Directors	Approves the Policy.
Chief Operating Officer	Policy Owner: owns, endorses and ensures the implementation of the Policy. Advises on policy content, and ensures relevant and correct communication of policy efforts to internal and external stakeholders.
Management, employees and contract workers of Elementum	Responsible for adhering to this Policy. Comply with the letter and spirit of the Policy. Engage and take responsibility for ensuring that all initiatives are developed in line with the Policy.

**Deviations**

No exemptions from this Policy can be granted unless there are exceptional circumstances or the Policy is obviously not applicable. All requests for exemptions must be made in writing to the Policy owner. The Policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

**Policy Revision**

This Policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It may be amended at any time with the approval of the Board of Directors. In the event of any discrepancies between the English version of this policy and a translated version, the English version will prevail.

**Associated Policies and Procedures**

- Sustainability Policy;
- Risk Identification and Assessment Procedure;
- Recourses Procedure;
- Training and competence Procedure;
- IMS Organisational structure Procedure;



- Internal and External Relations: Contractors Procedure;
- Monitoring Procedure;
- Emergency Response Procedure;
- Compliance Assessment Procedure;
- Internal Audits and Non-Conformities Management Procedure;
- Management Review Procedure;
- IMS Continuous Improvement Procedure; and
- Incident Investigation Procedure.

### **Contact**

For more information, please contact the Chief Operating Officer.