



Normative internal legal act	<b>Group Occupational Health and Safety Policy</b>
Title of the process	Occupational health and safety assurance
Approving company	AB "Ignitis grupė"
Process owner (unit)	Group Business Resilience
Approving person (body)	Management Board of AB "Ignitis grupė"
Date of approval, decision No.	By the decision No. PR_2022–73 of 13 December 2022
Date of entry into force	From the date of approval

## GROUP OCCUPATIONAL HEALTH AND SAFETY POLICY

A group of companies of AB "Ignitis grupė" (hereinafter – the Group) is introducing occupational health and safety policy to maintain employee motivation to work safely and to meet shareholder expectations of sustainable and responsible development while creating a modern, international, competitive energy Group.

While implementing the occupational health and safety policy the Group is aiming to establish the main principles of a strong culture of occupational health and safety which encompasses all employees of Group companies, ensures the application of good practices and unified, transparent data processing and analysis at the Group companies. The safety culture shall be formed based on personal responsibility and cooperation.

### 1. PURPOSE AND SCOPE

- 1.1. **The purpose of the policy** is to determine the main occupational health and safety principles of the Group.
- 1.2. **The scope of the policy** applies to all Companies of the Group.

### 2. TERMINOLOGY

- 2.1. **Programme "Is it safe?"** shall mean a safety culture development and improvement programme prepared for the Companies of the Group.
- 2.2. **Employee** shall mean a person working at a Company under an employment contract.
- 2.3. **OHS** shall mean occupational health and safety, i.e., all preventive measures to preserve Employee working capacity, health and life at work, which are used or planned in all stages of the activities of the Companies of the Group in order to protect Employees from occupational risks or reduce them as much as possible. Terminology such as 'occupational safety and health' and 'occupational health and safety' shall have the same meaning (*Art. 3.11 of LST ISO 45001:2018*).
- 2.4. **OHS Committee** shall mean a committee formed on a bipartisan principle using an equal number of employer representatives appointed by the employer (administration officers) and the elected Employee representatives for health and safety. The number of committee members shall be determined by the person representing the employer and the Employee representatives. A Company shall form an OHS Committee if it has 50 or more Employees.
- 2.5. **OHS Specialist** shall mean persons appointed by the employer, occupational health and safety specialists of or natural persons carrying out occupational health and safety functions or part thereof in a legal entity providing OHS services to a Company under a concluded contract for services.
- 2.6. **OHS Management System** shall mean the entirety of related or interfacing elements of the Group used for implementing the OHS policy and establishing the OHS objectives, and the processes required to achieve such objectives.
- 2.7. **Group** shall mean AB "Ignitis grupė" and the legal entities it controls directly or indirectly.
- 2.8. **Company** shall mean a company of the Group.
- 2.9. **Incident** shall mean a work-related event where an Employee suffers no damage to health or he/she does not lose an ability to work due to damage to health.
- 2.10. **ISO 45001 standard** shall mean the Lithuanian Standards Board's (LST) EN ISO 45001:2018 standard (Occupational Safety and Health Management System Requirements and Application Instructions).
- 2.11. **Accident** shall mean a work-related event, including a traffic accident, while performing job functions or while an Employee is commuting to or from work where an Employee suffers damage to health and losses the ability to work for at least one day or where an Employee dies, which has been investigated in accordance with the established procedure and has been determined as an Accident.
- 2.12. **Core Activities** shall mean economic activities of the Companies that generate monetary value in the Group (main revenue sources of the Group): energy generation, supply, distribution.
- 2.13. **Policy** shall mean the Group Occupational Health and Safety Policy, this document.
- 2.14. **Contractor** shall mean an external organisation which provides services to the Companies based on concluded contracts as well as specifications, terms and conditions specified therein.

- 2.15. **Risk** shall mean a possibility of trauma or other possible harm to Employee's health and safety due to the effect of hazardous and/or dangerous work environment.
- 2.16. **Occupational Risk Assessment** shall mean a process where: dangers and risk factors, severity of potential harm caused thereof and their probability are identified while considering the applicable protective measures; risk severity is determined; the decision (assessment) is made on the acceptability of risk, i.e., whether the risk is acceptable, tolerable or unacceptable, and on the application of preventive measures.
- 2.17. **Certified Company** shall mean a Company which has an ISO 45001 standard implemented and which complies with the requirements established therein.
- 2.18. **Structural Unit** shall mean an office, department, division or another separate independent structural unit that implements objectives and functions it's assigned.
- 2.19. **TRIR Event** shall mean fatal, serious, light Accident or Incident where an Employee was injured, excluding Accidents that took place when commuting to/from work and not work-related health problems.
- 2.20. **Internal Audit** shall mean independent, objective assurance and advisory activities carried out by the Internal Audit of the Group in respect of the Companies' activities, which are used to create added value to the Group and improve its activities. Internal Audit carries out systemic assessments and helps improve the effectiveness of the Group's management, risk management and control processes.

### **3. GENERAL PROVISIONS**

- 3.1. The Group companies carry out different activities but, regardless of the nature of their activities, occupational health and safety shall be considered a priority.
- 3.2. Group companies cooperate with each other and share the best practices.
- 3.3. Zero tolerance towards violation of the legislation regulating OHS shall be considered as one of the Group's goals and an integral part of its safety culture, which is based on awareness and responsibility of Employees.
- 3.4. In order to constantly improve occupational health and safety effectiveness in the Group's activities, the Companies carrying out the Core Activities of the Group must implement the ISO 45001 standard.

### **4. ORGANISING OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM**

- 4.1. The Group applies a "three lines" model, which defines clear limits of responsibility in respect of organisational management and control of OHS (Fig. 1).
- 4.2. Heads of Structural Units of the Companies are responsible for carrying out (or implementing) OHS requirements, instructing Employees on OHS issues, carrying out health inspection of Employees and other OHS related issues.
- 4.3. The Structural Units responsible for OHS or OHS Specialists of the Companies are directly accountable to the head of the Company to avoid any conflicts of interests when applying OHS control measures or measuring performance indicators.



Fig. 1. The OHS management and control scheme of the Group companies

## 5. LIABILITIES OF THE COMPANIES

- 5.1. Companies are responsible for preventing work-related traumas and illnesses, also for ensuring safe workplace, and shall commit to:
- 5.1.1. comply with requirements established in external and internal OHS-related legislation and the principles of this Policy;
  - 5.1.2. ensure that OHS responsibilities and OHS objectives are established at all levels of the Company and comply with the Group's strategic management principles. OHS goals of the Group are listed in the Group's strategic plan: <https://ignitisgrupe.lt/en/strategy>. OHS objectives of the Companies are established in annual plans of the Companies;
  - 5.2. ensure that all Employees undergo health inspection before they start working at the Company, and periodically undergo the inspections in accordance with the procedure set out in legal acts afterwards;
  - 5.2.1. ensure that all Employees are properly instructed on OHS issues before they start working, initiate the necessary Employee training;
  - 5.2.2. ensure constant internal OHS control at the Companies;
  - 5.2.3. ensure that OHS Management System requirements are included into Companies' processes;
  - 5.2.4. ensure that the necessary financial and human resources are allocated to create, implement, maintain and improve the OHS Management System;
  - 5.2.5. ensure that the Company's OHS complies with the LST EN ISO 45001:2018 standard (only applicable to Certified Companies) and the requirements of applicable legislation;
  - 5.2.6. eliminate hazards and reduce OHS risks, ensure the assessment of occupational risk of all workplaces in accordance with the procedure set out in legal acts;
  - 5.2.7. ensure the opportunity for Employees and their representatives to consult on OHS issues and participate in OHS Management System processes. support the establishment of OHS Committees and their activities;
  - 5.2.8. direct and encourage Employees to contribute to the achievement of established OHS objectives;
  - 5.2.9. ensure and promote constant improvement of the safety culture by implementing the objectives set out in the programme "Is it Safe?" while considering the nature of the Company's activities;
  - 5.2.10. ensure the accuracy of the data from the OHS monitoring carried out in the Companies and its accessibility when assessing compliance and business risks, for Internal Audit;

- 5.2.11. treat OHS as one of the core values of the organisation and communicate its relation to the wellbeing of Employees. endeavour to start all Employee meetings at all levels of Structural Units with OHS-related information.

## **6. PRINCIPLES OF ENSURING OHS**

- 6.1. The Group follows the principle of zero tolerance for violations. All violations of internal OHS legislation must be managed in accordance with the processes established in the Companies, and corrective actions must ensure safe and healthy working conditions in order to prevent any work-related trauma and/or illness.
- 6.2. Companies determine the areas of responsibility of the OHS Management System, establish the respective functions and authorise the responsible Employees. Heads of Structural Units are responsible for the safety of self-subordinate Employees.
- 6.3. Advanced and effective measures and methods are used to assess OHS data, document and control preventive measures that ensure data preservation, protection, convenient representation and analysis.
- 6.4. Involving Employees into creating a safe work environment and intolerance of non-compliances with the provisions of the Policy are some of the most important preventive measures, therefore, all Employees of the Companies are provided with the following opportunities while following the provisions of the Group Code of Ethics:
  - 6.4.1. contribute to improving safety at work and mental wellbeing, submit proposals, share good practices internally at the Company as well as with other Companies of the Group;
  - 6.4.2. share information about safe working practices, submit proposals on improving safe working practices;
  - 6.4.3. consult and participate when the decisions are made related to creating and supporting a safe, healthy, dignified working environment;
  - 6.4.4. constantly improve qualifications and competences, foster awareness and personal responsibility.
- 6.5. Only the partners who are reliable, working safely, comply with OHS requirements established by the Company shall be selected for the provision of OHS services to the Companies under concluded contracts for services, and who:
  - 6.5.1. comply with the Supplier Code of Ethics of the Group;
  - 6.5.2. provide information about the work hours spent at the Companies' objects and Accidents and Incidents where Contractor employees and/or other persons were injured therein in a timely manner;
  - 6.5.3. cooperate during workplace inspections and eliminate any flaws;
  - 6.5.4. implement occupational health and safety requirements stipulated in the legislation of the Republic of Lithuania while performing work or providing services at the objects of the Companies.
- 6.6. Companies organise control of the works performed by Contractors and inspections of workplaces with an objective to identify OHS violations and eliminate them as quickly as possible.
- 6.7. Companies cooperate with Contractor representatives and other third parties in order to determine potential OHS risks at the objects of the Companies and other objects where works are being performed as well as promote a culture of safety at work and zero tolerance for OHS violations.
- 6.8. Companies improve the reliability and resilience of equipment, invest into upgrading and automating generation equipment and processes by installing advanced technologies that reduce OHS risk factors at work.
- 6.9. OHS Specialists provide reports to the responsible Employee appointed by the Group Compliance and Business Risk Functional Area at the predetermined frequency on the OHS risks at the Companies and their monitoring results as well as other indicators (number of Incidents, Accidents, results of workplace inspections, results of Employee instructions and trainings, etc.), also by ensuring regular supervision of OHS activities.
- 6.10. The responsible Employee appointed by the Group Compliance and Business Risk Functional Area presents the summary and results of OHS activities at the Group level once per three months to the Management Board of AB "Ignitis grupė", Risk Management and Business Ethics Supervision Committee under the Supervisory Board of AB "Ignitis grupė" and the Supervisory Board of AB "Ignitis grupė", which submit proposals on how to improve OHS activities at the Group.
- 6.11. The Companies carry out periodic Internal Audit to assess the OHS system. It is mandatory for Certified Companies to carry out the Internal Audit of the OHS system.

## **7. REPORTS ON OHS VIOLATIONS AND ACCIDENTS**

- 7.1. All OHS violations, Incidents and Accidents that took place must be reported in accordance with the procedure and terms established in the internal legislation of the Group and/or the Companies.
- 7.2. Pursuant to the provisions of the Group Business Continuity Assurance Policy, serious and fatal Accidents shall be assessed and analysed by the Companies. If a serious or fatal Accident takes place, the information shall be provided to the Management Board of AB "Ignitis grupė" and the Supervisory Board of AB "Ignitis grupė" as quickly as possible.
- 7.3. All Accidents, TRIR Events and Incidents that take place shall be registered in the Employee health and safety incident registry of the Company and shall be investigated in accordance with the provisions of the legislation.

## **8. FINAL PROVISIONS**

- 8.1. Heads of Companies and/or Employees appointed thereof shall be responsible for the implementation and proper compliance with the provisions of the Policy.
- 8.2. Head of Group Business Resilience shall be responsible for monitoring the compliance with the provisions of the Policy at the Group level and shall ensure a timely revision of the Policy as needed.
- 8.3. The Companies shall ensure the compliance with the provisions of the Policy and prepare and approve internal legislation of the Companies ensuring the implementation of the Policy.
- 8.4. All Employees of the Companies shall be introduced to the Policy and comply with the provisions of the Policy as well as actively participate in its implementation.
- 8.5. The Policy shall be made publicly available on the website of the Group.

## **9. RELATED LEGAL ACTS**

*Law on Occupational Safety and Health of the Republic of Lithuania;*

*Order No. A1-60 of the Minister of Social Security and Labour of the Republic of Lithuania of 1 February 2016 "On the establishment of qualification requirements for occupational safety and health specialists, occupational safety and health officers of an occupational safety and health service, occupational safety and health officers of a legal entity or natural persons carrying out the functions of an occupational safety and health service, or a part thereof";*  
*Order No. A1-457/V-961 of the Minister of Social Security and Labour of the Republic of Lithuania and the Minister of Health of the Republic of Lithuania of 25 October 2012 "On the approval of general provisions on Occupational Risk Assessment";*

*Order No. A1-266/V-575 of the Minister of Social Security and Labour of the Republic of Lithuania and the Minister of Health of the Republic of Lithuania of 2 June 2011 "On the approval of model provisions on occupational safety and health services in Companies";*

*LST EN ISO 45001:2018 standard (Occupational health and safety management system requirements and application instructions);*

[Group Code of Ethics;](#)

[Supplier Code of Ethics of the Group;](#)

[Group Business Continuity Assurance Policy](#)