

IXCELLERATE LIMITED LIABILITY COMPANY

OCCUPATIONAL HEALTH AND SAFETY POLICY

APPROVED BY
General Director**A. I. Aksenov**

Corporate Bylaw “ _____ ” day of _____ 2021

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1. PURPOSE AND SCOPE

In their operations, IXCELLERATE LLC and IXCELLERATE 3 LLC (hereinafter referred to as “IXCELLERATE”) provide occupational safety and security for their employees, other parties involved in their operations and their customers and affiliates. IXCELLERATE will seek to prevent all accidents, injuries and occupational diseases through everyone's active involvement in IXCELLERATE's occupational health and safety management system. IXCELLERATE is making every effort to identify and eliminate or manage the safety and security risks related to its activities.

The Occupational health and safety policy HS-PL-001-210813 (hereinafter referred to as the “Policy”) shall be applicable to all employees, customers, visitors or third parties that can render services for or on behalf of IXCELLERATE, whatever the capacity in which they do it in all regions, areas of focus and functions. The employees and customers of IXCELLERATE must comply with all local regulatory requirements or the standards of IXCELLERATE that are applicable to their activities while staying on IXCELLERATE's premises.

IXCELLERATE works towards:

- safe operating activities and a responsible approach to occupational health and safety of IXCELLERATE's employees, customers and affiliates with whom it interacts;
- quarterly assessment of performance in providing safety and security with the involvement of IXCELLERATE's Management to breakdown performance indicators and identify opportunities for improvement;
- management of occupational health and safety risks in such a way so as to protect the business reputation and integrity;
- continuous improvement of IXCELLERATE's business processes with respect to occupational health and safety;
- full compliance herewith by employees and disciplinary action against non-compliers up to and including employment termination.

These commitments are the primary purpose of IXCELLERATE's management, individual and collective responsibility of all employees, customers and contractors of IXCELLERATE.

2. TERMS AND DEFINITIONS

This Policy uses the following terms as defined in ISO 45001:

- **safety and security:** Condition where vital interests of people and society are protected against internal and external threats, or the ability of an object, phenomenon or process to survive destructive impacts.
- **customer:** Organization and its representatives that uses IXCELLERATE's services.
- **consultation:** Seeking views before making a decision.
- **hazard:** A factor with a potential to cause injury or ill health.
- **procedure:** Specified way to carry out an activity or a process.
- **employee:** Person performing work or work-related activities under the control of an executive officer of IXCELLERATE.
- **workplace:** Area under control of IXCELLERATE where the employees perform their activities.
- **management system:** Set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives.
- **occupational health and safety management system:** Management system or part of a management system that is used to achieve the Occupational Health and Safety Policy.
- **contractor:** External organization performing works or providing services to IXCELLERATE in accordance with agreed specifications, terms and conditions.
- **occupational health and safety policy:** Policy to prevent work-related injury and ill health to employee(s) and to provide a safe and health workplace(s).
- **participation:** Involvement in decision making process.

- **occupational health and safety objective:** Objective set by an organization to achieve specific results consistent with the Occupational Health and Safety Policy.

3. MISCELLANEOUS

3.1. To achieve the objectives specified in cl. 1, IXCELLERATE undertakes to:

- 3.1.1. implement proactive risk management through the identification of hazards, risk assessment and elimination of the hazards using corrective action procedures in keeping with the nature of activities in the workplace and the scale of the risk;
- 3.1.2. comply with all such applicable legislative and other requirements for occupational safety and health as may be from time to time imposed on IXCELLERATE or as IXCELLERATE may elect to comply with;
- 3.1.3. set measurable goals and objectives in the area of occupational health and safety to enable ongoing improvement with a view to eliminating work-related injuries and diseases;
- 3.1.4. make executive officers, employees and other persons responsible for compliance with the occupational safety and health requirements;
- 3.1.5. set up an effective consultation process to ensure that all employees, contractors and customer representatives are involved in the decision-making processes that affect occupational health and workplace safety and security;
- 3.1.6. provide such information and guidelines and such relevant training and oversight as may be required to ensure that IXCELLERATE's employees can perform their jobs safely and competently;
- 3.1.7. provide adequate information and briefings on occupational health and safety for counterparties and visitors;
- 3.1.8. make this Policy readily available in the workplace and ensure that the provisions of the Policy are consistently and effectively implemented in all business areas and at all locations of IXCELLERATE;
- 3.1.9. create a culture that actively promotes zero injury through the management's example and commitment.

IXCELLERATE acknowledges that all CEOs and senior executives are collectively responsible for ensuring workplace safety and security.

3.2. IXCELLERATE will develop, implement and continually improve the occupational health and safety management system, which:

- 3.2.1. comprises written policies, procedures, manuals and guides that detail the requirements for the occupational health and safety management system and ensure its serviceability;
- 3.2.2. is compliant with the law and the rules in effect at the locations of our facilities;
- 3.2.3. provides a safe and secure workplace, equipment and environment;
- 3.2.4. provides all IXCELLERATE's employees, contractors and customers with recommendations to ensure their safety and security at IXCELLERATE's locations;
- 3.2.5. enables coordination and consultation with all stakeholders in matters of occupational health and safety in the workplace;
- 3.2.6. monitors and reduces the number of occupational injuries and diseases.

3.3. At a minimum, the Occupational Health and Safety Management System must include:

- 3.3.1. commitment and leadership of executives;
- 3.3.2. roles, duties, powers and authority;
- 3.3.3. hazard identification, control prioritization and corrective action procedure;
- 3.3.4. incident investigation and root cause analysis procedure and recommended corrective action;
- 3.3.5. follow-up assessment and monitoring procedure;
- 3.3.6. communication, training and awareness raising procedure;

- 3.3.7. engagement culture promotion methods;
 - 3.3.8. document management procedure;
 - 3.3.9. audit requirements;
 - 3.3.10. management review procedure.
- 3.4. All workplaces will be covered by the Occupational Health and Safety Management System with due regard to the specific requirements and applicable statutory requirements consistent with the nature of the activity, the scale and the geography.

4. DUTIES

The General Director shall be responsible for ensuring the implementation of the Policy and shall make adequate financial and physical resources available to implement this Policy. Personal responsibility of the heads of business units and executive officers shall be imposed by orders and other documents of the occupational health and safety management system.

IXCELLERATE's employees are required to:

- 4.1. know, understand and comply with all such rules, procedures and written instructions in the area of occupational health and safety as may be applicable to their workplace;
- 4.2. successfully complete the necessary occupational safety and health training;
- 4.3. report incidents or close calls, attend training in occupational health and safety, report problems and recommend improvements, as well as engage in other attendant activities;
- 4.4. notify the line manager or superior of any security threats or systemic shortcomings in the workplace;
- 4.5. be responsible for their personal health and safety, as well as for others who can be affected by their actions in the workplace;
- 4.6. refrain from interfering with the equipment, systems and processes responsible for ensuring occupational safety and health, and use them strictly for the intended purpose;
- 4.7. cooperate with IXCELLERATE's management in ensuring regulatory compliance and otherwise performing their assigned duties;
- 4.8. promote safe work practices among their colleagues in order that they do not endanger themselves or others when working with them in situations that can lead to injuries or diseases;
- 4.9. record, whatever their job title or location, any unsafe situations (work activities) identified, and report these to their line manager.

The occupational safety and health measures appropriate for the workplace are detailed in occupational health and safety management documents, which are available at the employee's every workplace. There are occupational safety and health notice boards that provide information and updates at IXCELLERATE's locations.

5. REVIEW FREQUENCY

- 5.1. This Policy will be updated in the event of legislative amendments, changes to IXCELLERATE's working conditions, values or intentions relating to occupational health and safety, as well as in response to findings of a management review of the integrated management system. At a minimum, this Policy will be reviewed and approved every three years for applicability, practicality and effectiveness.

Revision history

Version number	Effective date	Summary of change introduced
HS-PL-001-210813	2021-__-__	Original version