

OCCUPATIONAL HEALTH AND SAFETY

POLICY

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History of Revisions				
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1. Introduction

For Barba Stathis, the health and safety of all staff is a fundamental and primary operational objective. Barba Stathis, by operating responsibly, recognizes both its responsibility for the continuous improvement of the Health & Safety conditions in its workplaces and the right of its employees and the employees of independent partners and contractors who carry out work at its premises to work without being exposed to risks that could cause an accident, injury or occupational disease.

1.1 Approvals - Policy Monitoring Mechanism

This policy is approved by Senior Management.

The Compliance Directorate is responsible for the monitoring and control of this policy and any revision thereof whenever this is deemed necessary.

The policy has an immediate and universal effect.

This policy is posted on the company's intranet from which is easily accessible by all employees.

2. Key health and safety concepts

Some key concepts in HSE issues include the following:

- 2.1 Source of risk (or risk factor): a situation or action with the potential to cause harm in terms of human injury or illness, or a combination of these, i.e. anything that in the course of work has the potential to cause injury or harm to employees' health (respectively, an accident at work or an occupational disease).
- **2.2 Risk:** is the combination of the likelihood of a hazardous event (or exposure to a risk factor) occurring and the severity of the injury or damage to employees' health that may result from such event or exposure.
- **2.3 Risk assessment:** is the process of evaluating the risks to the health and safety of employees in the workplace. It is a systematic examination / study of all aspects of work which examines:
 - what could cause injury or harm and to whom
 - whether the risks can be eliminated
 - what prevention and protection measures should be taken to control and prevent the risks.

- **2.4 Safety:** It is the state in which we feel "safe", i.e. completely free from the threat of some danger that could cause injury or harm to health, (which in practice is impossible to achieve). Therefore, safety should be seen as a value judgement about the level of risk of injury or harm that is considered to be acceptable.
- **2.5 Health (in relation to work):** "The state of complete physical, mental and social well-being and not merely the absence of disease or infirmity" (World Health Organization Constitution, 1946).
- **2.6 Occupational disease:** Occupational disease is defined in two different ways:
 - i. According to the definition provided by medical science, an occupational disease is a disease related to the type of risks to which the sufferer has been exposed due to one's work. This is any disease that can be proven, on the basis of medical criteria, to be attributable to the type of work and the risks to which the employee has been exposed as a result of one's work.
 - ii. The second definition is based on the insurance landscape in each country. In other words, an occupational disease is a disease that is recognized as such by the current insurance system, subject to the conditions and restrictions that it imposes.
- **2.7** Accident at work: a violent and sudden event that occurs during or on the occasion of work, resulting in damage to the health or loss of life of the employee. In other words, when it was caused by a violent action, which has an external cause, external to the victim's body and which occurred during the performance or on the occasion of work, directly or indirectly, in a relationship of cause and effect.
- **2.8 Prevention:** all steps or measures taken or planned to be taken at all stages of work in the company to eliminate or reduce occupational hazards.

3. Roles and responsibilities of persons and departments

3.1 Industrial Infrastructure & Technological Development Manager

- Draws up a written assessment of the risks at work and takes the necessary measures to protect the health and safety of employees by drawing up an occupational risk prevention program.
- Provides the company with written or oral advice on matters relating to occupational health and safety and the prevention of occupational accidents.

- Implements the recommendations of the technical and health inspectors, facilitating their work within the company during inspections.
- Supervises the proper implementation of occupational health and safety measures and informs employees about occupational hazards at work.
- They are responsible for the design, planning, construction and maintenance of equipment and facilities and ensure the procurement of means and equipment, personal protective equipment, in collaboration with the Purchasing Manager.
- Checks the safety of installations and technical equipment before they are put into operation, as well as production processes and working methods before they are implemented.
- Supervises the registration in a special book of the company, which is bookmarked and verified by the Labor Inspectorate, of the written instructions of the Authorities, ensuring their observance and compliance.
- Chairs the Health & Safety Committee and ensures that the committee is convened and meets regularly.
- Recommends and proposes a training program to the Human Resources Directorate and works together with the Human Resources Manager to organize training seminars on accident prevention and avoidance and to further improve Health & Safety measures.

3.2 Safety Technician

The Safety Technician provides suggestions and advice, written or verbal, on matters relating to occupational safety and the prevention of occupational accidents. The written suggestions are recorded by the Safety Technician in a special company book (Safety Technician's Written Suggestions Book). The employer has the obligation to acknowledge in writing the instructions entered in this book.

In particular, the Safety Technician:

- advises on matters relating to the organization and planning of work, the introduction and supply of means and equipment, the selection and control of the effectiveness of personal protective equipment, the layout and arrangement of workstations and the working environment and, in general, the organization of the business.
- checks the safety of installations, technical equipment, production activities and working methods before they are implemented and supervises the implementation of occupational health and safety measures and helps to prevent accidents by informing the management of the company accordingly.

In order to supervise the working conditions, the Safety Technician is obliged to:

- Inspect workstations regularly and report any deficiencies.
- Propose remedial measures and oversee their implementation.
- Check that personal protective equipment is used correctly.
- Investigate the causes of occupational accidents, analyze and evaluate the results of their investigations and propose measures to prevent similar accidents.
- Ensure that the employees of the company comply with the rules of Occupational Health and Safety, and inform and instruct them in order to prevent occupational risks associated with their work.
- Contribute to the development and implementation of employee training programs on occupational health and safety issues.

The Safety Technician has a duty to respect operational confidentiality.

3.3 Occupational physician

The Occupational Physician is the main consultant of the employer, with regard to taking the necessary measures to protect the health of company employees, and his or her work is governed by specific duties, consulting responsibilities and obligations, which are specified by law.

In the context of prevention and protection of employees' health, indicatively:

- They perform medical examinations on employees in relation to their workplace, arrange for medical examinations and measurements of work environment factors and issue a certificate of suitability of employees for the specific job.
- They advises on issues:
 - planning, programming, modification of the production process, construction and maintenance of installations, in accordance with the rules of employee health and safety,
 - taking protective measures when introducing and using materials and supplying equipment,
 - occupational physiology and psychology, including the prevention of violence and harassment at work, including sexual harassment, ergonomics and occupational hygiene, the organization and configuration of workstations and the work environment, and the organization of the production process,
 - organizing a first aid service,
 - initial assignment and change of post for health, physical or mental health reasons, temporarily or permanently, as well as the integration or reintegration of discriminated persons or victims of violence and harassment, including sexual harassment, and victims of domestic violence into the production process, including by suggesting a redesign or reasonable adaptation of the workstation.

- Supervises the implementation of health protection measures for employees, regularly inspecting workstations and proposing measures to address any shortcomings identified, carries out vaccination programs for employees on the instructions of the competent public health department of the region where the Company is located, explains the necessity of the correct use of personal protective equipment and supervises the compliance of employees in general with health and safety rules, informing them of the risks arising from their work and the methods of preventing them.
- Investigates the causes of work-related illnesses of employees, analyzes and evaluates the results of the investigations and proposes measures for the prevention of such illnesses.
- If the company does not have the appropriate infrastructure, it is required to refer employees for specific supplementary medical examinations, which are the responsibility of the employer, at private institutions or at competent medical centers of insurance providers or the Greek Health System (ESY).
- Provides emergency care, especially in the event of an accident, an incident of violence or sudden illness.
- They must keep a medical record for each employee and observe medical confidentiality.
- They are obliged to cooperate with the Safety Technician by carrying out joint inspections of work areas.

3.4 Health and Safety Committee

It shall meet once a month and shall be composed of:

- The Head of Industrial Infrastructure & Technological Development
- The Logistics Manager
- The Human Resources Manager
- The Safety Technician
- The Occupational Physician
- Representatives of the employees' union
- Heads of other Directorates (who may participate if necessary)

The Employee Health and Safety Committee is an advisory body and has the following responsibilities:

- to study the working conditions within the company, to propose measures to improve these conditions and the working environment, to monitor compliance with health and safety measures and to contribute to their implementation by employees,
- ii. in cases of industrial accidents or related incidents, to propose appropriate measures to prevent their recurrence,

- iii. to identify the occupational risk in the work areas or workstations and propose measures to address it, thus participating in the formulation/ updating of the company's policy for the prevention of occupational risk,
- iv. to be informed of the introduction into the company of new production processes, machinery, tools and materials or the operation of new installations in the company, in so far as they affect occupational health and safety conditions,
- v. in the event of immediate and serious danger, to call upon the employer to take appropriate measures, not excluding the shutdown of machinery or plant or the production process,
- vi. it may request the assistance of experts on health and safety matters of employees, with the consent of the employer.

3.5 Employee participation

Employees and their representatives on health and safety issues:

- propose new health and safety measures and express their views on existing measures
- are consulted on the operation of the health and safety arrangements of the company
- provide their opinion on the planning and organization of their health and safety training

4. Purpose

For Barba Stathis, the health and safety of all personnel and the continuous improvement and upgrading of the working conditions of employees is a non-negotiable priority. Human resources are the Company's most important asset. The Company recognizes its responsibilities towards employees, creating the optimal conditions for their safety at work.

5. Legislation

The legal framework in force

6. Policy

6.1 Scope of application

The principles and obligations set out in the Health and Safety Policy which has been approved by the Management of Barba Stathis, apply to personnel working for or on behalf of the Company at all levels, including senior managers, executives, members of the Board of Directors, employees, consultants, contractors, trainees, seconded staff, occasional workers and staff from employment agencies, third party service providers, agents, contractors / sponsors or any other person associated with the Company, regardless of where they are located.

6.2 Basic principles

In the context of its operations, the Company is committed to the following basic principles which govern all its organizational levels:

- Full compliance with current Occupational Health and Safety legislation, adherence to internal procedures and guidelines and harmonization with international standards.
- Continuous identification and assessment of occupational hazards and levels of exposure to harmful agents and taking measures to control and reduce these.
- Setting quantitative and qualitative targets on occupational health and safety, and monitoring their progress through international performance indicators.
- Drawing up preventive action programs to improve working conditions and plans for preventive and corrective actions, procedures and instructions to ensure that risks are eliminated or minimized.
- Incorporating Occupational Health and Safety principles/criteria into the Company's key processes (e.g. procurement & purchasing, mergers and acquisitions, approval of major Company projects) and working methods.
- Continuous improvement of Occupational Health and Safety Management systems through the implementation of best practices.
- The objectives of the programs, procedures and guidelines for establishing, reviewing and achieving the objectives for occupational health and safety are documented through the development of the OHSAS 18001 system.
- Open and transparent communication on all matters relating to health and safety at work. Participation of employees and their representatives in consultation processes on the improvement of occupational Health & Safety Management systems.

- Continuous updating, awareness raising and training of staff, with the aim of eliminating accidents in the workplace and promoting a responsible Health and Safety culture.
- Conducting regular internal and external audits to assess the performance of the Occupational Health and Safety Management systems, the achievement of objectives and the implementation of regulations and principles.
- Process for reporting and investigating Health and Safety incidents and taking preventive and corrective actions.
- Preparedness and response to emergencies with the participation of appropriate staff and the availability of the necessary first aid equipment as required.
- Recognizing the needs and expectations of Social Partners on Health and Safety issues, demonstrating awareness of these needs and expectations and promoting a culture of cooperation.
- Updating and training of partners (contractors, suppliers, customers) on the Company's Health & Safety policy, in order to strengthen the relevant culture in their workplaces.

6.3 Means of achieving the objectives

In order to successfully implement this Policy, the Company provides employees with the following:

- Personal protection equipment.
- Fire safety (maintenance / upgrade of fire protection equipment).
- Medical service and health monitoring.
- Staff training on Health and Safety issues.
- Information material related to Health and Safety.
- Safety improvement projects.
- Premises cleaning projects.
- Personal protective equipment.
- Health and Safety Committee with the participation of management and employee representatives.
- Involvement of employees' representatives in health and safety inspections, audits and accident investigations.
- Right to refuse to perform unsafe work.
- Periodic inspections.
- Compliance with International Labour Organization (ILO) conventions.
- Commitments to standards for performance targets or the level of practice applied.

6.4 Objectives

The objectives of this policy are fully aligned with the company's broader ESG strategy and the primary objective is to ensure an injury-free work environment by 2030.

7. Accident management

7.1 The main causes of accidents in industry potentially include:

- The technical equipment, on matters relating to its design, use and installation.
- Working conditions, for issues relating to noise, temperature, ventilation and lighting.
- Humans, on issues relating to the way they work, their perception of space and physical health.
- **7.2** In the event of an industrial accident, first aid is provided immediately by the trained first aid team by area of responsibility.
- **7.3** The Safety Technician is immediately notified who immediately informs the relevant Manager, the Occupational Physician, the Head of Industrial Infrastructure and Technological Development, the Human Resources Manager and the Payroll Manager for the relevant statements/reports to the Municipal Authorities (S.E.P.E., AT) and their subsequent actions.
- **7.4** The Safety Technician visits the site of the accident and supervises the provision of first aid while assessing the employee's condition in cooperation with the occupational physician.
- **7.5** Then, if there is a need for further medical attention, an ambulance is notified for immediate evacuation of the employee.
- **7.6** Throughout the potential transfer to a hospital there is an open information procedure, and if necessary, the employee is accompanied by a colleague/ supervisor.
- **7.7** The Safety Technician investigates the circumstances of the accident, updates the relevant accident book and prepares a report to be presented to the Health and Safety Committee.
- **7.8** In the event of an accident, the employee's state of health is monitored by the Head of the Directorate and when his or her recovery is complete, he or she is first examined by the occupational physician to confirm his or her recovery and ability to return to work.
- **7.9** The Safety Technician also oversees the corrective actions that will be proposed to eliminate similar accidents.
- 7.10 The safety technician updates the Occupational Risk Assessment study.

8. Staff training - awareness raising

- **8.1** In an effort to ensure the success of the policy and the adoption of health and safety principles at work, Barba Stathis has developed a training program for all employees according to their position.
- **8.2** Through continuous actions and updates it tries to raise awareness among its people and expects their active participation in the implementation of the Present Policy.
- **8.3** As part of ongoing training, teams from each facility are trained on health and safety issues such as:
 - First aid
 - Evacuation plans
 - Use of personal protection measures
 - Accident prevention
 - Use of materials and supplies
 - Use of technical equipment

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