

APPROVED  
by order of MC Delo  
dated February 16, 2022 No.6

**OCCUPATIONAL SAFETY POLICY  
OF MC DELO  
(revision No. 1)**

City of Moscow  
2022

This Policy has been developed in accordance with the Labor Code of the Russian Federation and other regulatory legal acts of the Russian Federation.

## **1. General provisions**

1.1. The objective of labor protection activities is to ensure the safety of life, preservation of health and working capacity of employees of the Limited Liability Company "Management Company "Delo" (hereinafter - "MC Delo", the employer) in the course of working life.

1.2. This Policy defines:

1.2.1. Occupational safety principles of MC Delo.

1.2.2. Tasks of MC Delo for implementation of basic occupational safety principles.

1.2.3. The main lines of work on labor protection and safety in MC Delo.

1.2.4. Allocation of responsibilities between the employer and employees of MC Delo to ensure performance of occupational safety activities.

1.2.5. The role and place of the person responsible for occupational safety.

1.2.6. Accident investigation procedure.

1.3. Compliance with the requirements of occupational safety legislation is an important and integral part of the overall activities management system of MC Delo, the key to business stability and improvement of economic position and well-being of all employees of MC Delo as a whole.

1.4. This Policy shall be binding on all employees of MC Delo.

## **2. Occupational safety principles**

2.1. Basic occupational safety principles of MC Delo.

the principle of priority of preserving life and health of employees in the course of their working life;

the principle of recognizing probability of damage to health of employee in view of severity of consequences as an occupational risk that must be taken into account by MC Delo in its operations;

the principle of involvement of management and employees of MC Delo in occupational safety management system;

the principle of resources capability, which involves allocation by MC Delo of funding to achieve goals and objectives set in the field of occupational safety;

the principle of disclosure of information about activities in the field of occupational safety in MC Delo;

the principle of continuous improvement of the occupational safety system, its adaptation to changes in external and internal work environment;

the principle of social partnership within the framework of direct dialogue between employer and employee;

the principle of personal responsibility of management and employees of MC Delo for proper performance of their duties in the field of occupational safety;

the principle of compliance with all relevant laws, regulations and other statutes containing state requirements to occupational safety, occupational safety programs, as well as collective agreements on occupational safety and any other obligations and requirements voluntarily accepted by organization.

### **3. Occupational safety objectives**

3.1. With a view to implement the basic principles in the field of occupational safety MC Delo focuses on the following:

ensuring occupational safety and safe working conditions for employees of MC Delo in the course of their working life;

minimization of risks and prevention of threat of injury and occupational diseases of employees of MC Delo;

build-up and maintaining high image and reputation of MC Delo in occupational safety issues;

ensuring compliance of working conditions at workplaces with occupational safety requirements.

### **4. The main lines of work in the field of occupational safety**

4.1. In order to ensure safe working conditions and occupational safety, the employer shall:

ensure the safety of employees during operation of buildings, structures and equipment;

ensure that working conditions at each workplace meet the occupational safety requirements;

ensure that individual characteristics of employees are taken into account through arrangement of workplaces, selection of equipment;

ensure that work and rest pattern of employees conforms to requirements of the legislation of the Russian Federation and the legislation of the constituent entities of the Russian Federation;

provide training in safe work methods and practices, occupational safety and first aid treatment in case of accidents at work, health and safety briefings and assessment of knowledge of occupational safety requirements, safe work methods and practices;

ensure that persons who fail to receive health and safety training and briefing in due course and to undergo assessment of knowledge of health and safety procedures are not admitted to work;

ensure monitoring of working conditions at workplace;

ensure that a special assessment of working conditions in the organization is made;

when necessary, and at its own expense, arrange for compulsory preliminary (at the commencement of employment) and periodic (during employment) medical examinations (surveys) of employees, unscheduled medical examinations (surveys) of employees at their request in accordance with medical assessment report with preservation of their job (position) and maintenance of average wage for the duration of the above medical examinations (surveys);

ensure that employees are not allowed to perform their work duties in case of medical contraindications;

ensure that consultations are held with employees on issues of management and improvement of occupational safety system in the organization;

ensure that employees are informed about working conditions and occupational safety at workplace, about the existing risk of damage to health, available compensations and personal protective equipment;

ensure that measures are taken to prevent emergencies, preserve life and health of employees in the event of such situations, including first aid to victims;

ensure investigation and recording of industrial accidents and occupational diseases in accordance with the procedure established by the labor legislation;

provide sanitation and housekeeping support, and medical-preventive services to employees in accordance with the occupational safety requirements;

provide unimpeded access of officials of government agencies in charge of occupational safety and health management, public authorities in charge of oversight and monitoring compliance with labor legislation and other regulatory legal acts containing employment and labor statutes, bodies of the Social Insurance Fund of the Russian Federation, as well as representatives of public oversight bodies in order to conduct inspections of labor conditions and safety in the organization and investigation of accidents at work and occupational diseases;

ensure that instructions of officials of public authorities in charge of oversight and monitoring compliance with labor legislation and other regulatory legal acts containing employment and labor statutes are complied with;

maintain compulsory social insurance of employees against industrial accidents and occupational diseases.

Employee shall:

comply with occupational safety requirements established by the laws and other regulatory legal acts, as well as by occupational safety rules and instructions;

promptly notify immediate or line manager of any situation that threatens life and health of people, of every accident or deterioration of his/ her health, including any signs of acute occupational disease (poisoning).

## **5. Person responsible for occupational safety**

5.1. Person responsible for occupational safety appointed by order of the General Director of MC Delo is charged with the following duties in order to exercise organizational, coordinating, instructional and control functions:

monitoring compliance by all employees of the company with the existing health and safety legislation, rules, norms and instructions;

providing on-the-job briefings and induction training upon entry into employment;

analysis and addressing any deficiencies in ensuring safe working conditions;

periodic assessment of employees' knowledge of health and safety procedures;

development and preparation of occupational safety documentation.

Person responsible for occupational safety reports directly to the General Director of MC Delo on any health and safety issues.

## **6. Monitoring and analysis of working conditions**

6.1. MC Delo implements and improves the control system, which:

ensures systematic monitoring of technical condition of equipment, materials and collective and individual protective means used;

ensures systematic monitoring of compliance with the requirements of applicable statutes of international law and applicable legislation;

ensures control and analysis of implementation of measures aimed at eliminating any identified deficiencies in the field of occupational safety and their causes;

obliges contractors to carry out their own systematic monitoring of compliance with the requirements of applicable statutes of law and health and safety requirements of MC Delo.

Person responsible for occupational safety informs the General Director of MC Delo about all violations and comments with a view to take steps aimed at eliminating any violations and holding guilty persons liable.

## **7. Elaboration of occupational safety measures and improvement of working conditions**

7.1. Occupational safety measures are elaborated by person responsible for occupational safety on the basis of:

- results of analysis of working conditions at workplace;
- financial plan;
- findings of inspections undertaken by supervisory authorities.

Control over implementation of occupational safety measures is exercised by the General Director of MC Delo.

## **8. Accident investigation**

8.1. Accident investigation procedures are determined by the existing legislation of the Russian Federation.

## **9. Final provisions**

9.1. This Policy shall be put into effect, amended and canceled by order of the General Director of MC Delo.

9.2. All amendments and additions to this Policy shall be made by order of the General Director of MC Delo.

9.3. This Policy is public.

9.4. This Policy shall be communicated, disseminated and made available in due course by informing the employees of MC Delo and publishing on internal and external information resources of MC Delo.

9.5. MC Delo also brings this Policy to the attention of its partners and contractors, and engages with the latter subject to provisions of this Policy.

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