



Eficode Group Health and Safety Policy

CONFIDENTIAL

27 March 2024

Document I.D.	Eficode Group Health and Safety Policy Group Health and Safety Policy setting out our commitment to health and safety throughout the Group.
Owner	Eficode Management Team
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Version n:o and Issue Date	Latest Review Date	Summary of Changes
v1.0 / 27 March 2024	27 March 2024	Initial version
v1.1 / 24 March 2025	24 March 2025	Updated the link to the new Group Whistleblowing Policy

1. Definitions

“**Board**” means the Board of Directors of Eficode Group.

“**Eficode Group**” or “**Group**” means Eficode Holdings Oy and all (or any, as context may require) of the legal entities belonging to the same group of companies as it, as set out in the Finnish Accounting Act from time to time.

“**Eficode People**” means all Eficode employees and Eficode non-executive directors, such as the members of the Board of Directors and those individuals acting as Eficode’s authorised agents.



“Policy” means this group policy governing health and safety in the Eficode Group.

2. Purpose

At Eficode our primary concern is the safety and wellbeing of our employees, our clients, our contractors and the wider community. We understand that we can impact these matters by managing our people and our work practices in a safe and responsible way. This Policy establishes a set of common principles, minimum operating standards and behaviors which will be practiced at every location where we operate. These are based on the strictest regulatory requirements and industry best practice.

3. Scope

This Policy applies globally to all personnel of all entities controlled by Eficode Group while performing duties at Eficode Group sites and at offsite locations. It also applies to contractors, suppliers and members of the public whilst located at Eficode Group sites.

This Policy sets out our commitment to health and safety and the principles that apply to all our global operations, with no exceptions. It is also anticipated that certain geographies within Eficode Group may require local policies in order to comply with national and local laws and regulations, in addition to the provisions of this Policy. Where national law and international health and safety standards differ, we will follow the higher standard; when faced with conflicting requirements, we will adhere to national law, while seeking ways to honor the principles of international standards.

This Policy is not a static document. It evolves with the changing landscape of our industry and the continuous growth of our Group. This Policy will be reviewed in response to significant change, and at a minimum annually.

4. Our Commitment

People are core to the success of Eficode and therefore doing the right thing to protect their health and safety is important to our business. We manage health and safety in a way that takes reasonable and practicable steps to protect the health and safety of employees from risks in their work or working environments so we can prevent injury and ill health and always in a way that complies with health and safety laws and regulations.



This applies to all employees, to every part of our business, and in every part of the world. Our commitment extends to those who interact with Eficode at our locations such as clients, contractors and visitors.

5. Principles

As an integral part of meeting our commitment, we must lead by example and ensure that employees are actively involved in health & safety programmes and initiatives. Our approach to health and safety includes:

- Understanding our health and safety legal obligations in our countries of operation.
- Taking reasonably practicable steps to ensure that the health and safety issues of our employees and others visiting at Eficode locations are identified and eliminated or reduced to an acceptable level.
- Contractors are competent and have systems in place to comply with safety legislation, standards and procedures.
- Safe and healthy working environments and equipment are provided and maintained.
- We consult with employees and we inform and engage employees to encourage their commitment to health and safety matters.
- We define and communicate the roles and responsibilities for health and safety and ensure individuals are competent to discharge their responsibilities.
- We provide suitable information, training and supervision for employees.
- We have first aid, emergency response procedures and critical incident support in place to minimise the impact of incidents on our people and the business.
- Occupational health, hygiene and wellbeing measures are in place and actively promoted, with a focus on both physical and mental health.
- We report and review all accidents, occupational ill health and significant near misses to minimise the likelihood of a recurrence. Management, or where applicable, designated health and safety officers must keep accurate records of reported incidents, ensuring proper classification, reporting, communication, analysis and follow-up.
- We regularly review and report our performance transparently to our stakeholders to drive continuous improvement.
- We have appropriate employer's liability insurance in accordance with our statutory duties and a copy is available for inspection by employees.

6. Roles and Responsibilities



The CEO

The CEO, under the monitoring of the Board, is responsible for ensuring Eficode's health and safety management system is proportionate, sufficiently implemented and reviewed annually or if there are significant changes that impact health and safety.

The Management Team

The Management Team has ultimate responsibility for:

- Setting health and safety objectives and targets as applicable.
- Development and implementation of a suitable health and safety policy.
- Ensuring that Eficode Group has a clear understanding of its responsibilities for implementing health and safety.
- Ensuring that adequate resources are provided to enable health and safety to be implemented within the organisation.
- Ensuring that adequate reviews are undertaken to ensure the effectiveness and implementation of this Policy and that health and safety is lead by example to develop a strong, positive health and safety culture.

Country Managers

The Country Managers are responsible for:

- Appointing a competent health and safety officer or designated person in accordance with local law who may be delegated operational responsibility under this Policy.
- Investigating all serious accidents, incidents, near misses and dangerous occurrences, and identifying areas for improvement.
- Ensuring that topic specific health and safety policies and procedures which reflect the requirements of this Policy are developed and implemented.
- Ensuring that all health and safety documents are easily accessible to all employees.
- Ensuring that suitable health and safety risk assessments are implemented.
- Development of local health and safety plans to manage health and safety related risks.
- Ensuring there are sufficient resources to successfully implement the Policy and meet the objectives set out in local health and safety plans.
- Ensuring arrangements are in place to monitor and review health and safety performance, including accidents and incidents; and ensuring that the necessary amendments are made to relevant policies, procedures and processes within their country or business unit.
- Ensuring that health and safety topics are clearly communicated to employees with the appropriate levels of training identified and delivered.
- Ensuring that overall health and safety performance is communicated to the Management Team on a regular basis along with a clear strategic plan to drive continued improvement as necessary.



- Actively participating in site inspections, audits and accident investigation activities as directed by the Management Team or Group Sustainability and Compliance Manager.
- Ensuring that relevant health and safety statistics, including, as a minimum, number of work-related injuries, work related fatalities, and days of work lost due to injury are recorded and provided to the Group Sustainability and Compliance Manager on request.

Employees

General duties of an employee include:

- Employees are responsible for their own health and safety.
- Ensure their actions will not jeopardize the safety or health of others.
- Learn and follow the operating procedures, risk assessments and health and safety rules and procedures brought to their attention.
- Comply with information, instruction or training provided.
- Correct, or report any observed unsafe practices and conditions.
- Keep work areas clean and tidy and free from obstruction.
- Make suggestions to improve any aspect of health and safety.
- Comply with emergency arrangements.
- Not to interfere with anything provided to safeguard their health and safety.
- Reporting all health and safety concerns to an appropriate person.

7. Training

- All Eficode People are expected to be familiar with and trained on this Policy.
- All Eficode People and visitors working on site locations must be trained on local safety procedures such as fire, evacuation and on how to seek first aid.
- Country Managers are required to ensure that role/location specific training is provided where appropriate.
- Country Managers are required to establish personnel training and competence assessment for employees who perform tasks that can impact on health and safety performance, such as designated health and safety officers to whom they delegate operational responsibility under this Policy.

8. Raising Concerns

There is an expectation that employees will speak up when they have observed actions that have (or could) lead to the endangerment of themselves, colleagues, clients, contractors or the general public.



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If you see or hear something that falls short of our expected high standards of health and safety you should be able to discuss it with your manager or the Group Sustainability and Compliance Manager.

If you need to raise a health and safety concern confidentially and anonymously you may report through the whistleblowing channel, as outlined in the [Eficode Whistleblowing Policy](#).