

POL-MET Sp. z o.o. – Occupational Health and Safety (OHS) Policy

Purpose and Scope

The purpose of this Occupational Health and Safety (OHS) Policy is to formally define the commitments of POL-MET Sp. z o.o. (hereinafter: the Company) regarding the protection of employees' health and life as well as the prevention of accidents and occupational diseases in the construction services sector and in the production of steel structures. The Policy covers all organizational units of the Company and forms the basis for the development of an OHS management system compliant with Polish law, European Union requirements, and international standards, including International Labour Organization (ILO) conventions.

Legal Basis and Standards

1. **Polish Labour Code** – obliges the employer to provide employees with free personal protective equipment that meets conformity assessment requirements and to provide instructions on its use.
2. **Regulation (EU) 2016/425 on personal protective equipment** – sets out essential requirements for the design, production, and conformity assessment of protective equipment.
3. **International Labour Organization** – recognizes safe and healthy working environments as a fundamental principle and right of all workers and requires employers to prepare emergency readiness plans and provide emergency infrastructure (alarms, first-aid kits, emergency lighting).
4. **Polish OHS guidelines** – including publications of the National Labour Inspectorate concerning machine operation, personal protective equipment, fire protection, and accident procedures.

General Commitments

1. **Management commitment** – The Management Board and leadership of the Company are committed to providing the necessary resources (financial, human, and technical) for implementing and continuously improving the OHS system, with the objective of "zero accidents."
2. **Safety culture** – The Company promotes a safety culture based on prevention, open communication, and the involvement of all employees. Employees have the right and obligation to report hazards, accidents, incidents, and "near-miss situations" without fear of retaliation.
3. **Risk assessment** – We regularly identify hazards and conduct occupational risk assessments for all workplaces, including machine operation (welders, cutters, drills, plasma devices, band saws, cranes, forklifts), construction work, and steel structure assembly. The results are documented and used to select protective measures and update procedures.
4. **Training and competence** – Employees are provided with initial and periodic OHS training, including safe machine operation, the use of personal protective equipment, and emergency procedures. Only properly trained persons informed of risks may operate machines.
5. **Employee participation** – Employees are engaged in the development and review of OHS procedures and are consulted in the selection of personal protective equipment.

Area 1 – Personal Protective Equipment (PPE)

1. **Provision of PPE** – According to Article 237⁶ §1 of the Labour Code, the employer must provide employees with free personal protective equipment meeting conformity assessment requirements and inform them of how to use it.
2. **Definition and types of PPE** – PPE is equipment worn or held by the user to protect against threats to safety or health. It includes protective clothing (coveralls, jackets, aprons), limb protection (gloves, footwear), head protection (helmets), eye and face protection (goggles, shields), hearing protection (earmuffs), respiratory protection (masks, half-masks), and fall protection equipment.
3. **Selection and use** – PPE selection is preceded by hazard analysis and risk assessment. PPE is provided when hazards cannot be eliminated or reduced through work organization or collective protective measures. Employees are obliged to use the PPE provided in accordance with instructions, and the employer has the right to monitor compliance.
4. **Storage and maintenance** – PPE as well as work clothing and footwear that have come into contact with chemicals, radioactive materials, or infectious substances must be stored in designated places, which the employer is obliged to provide. The Company ensures proper storage, cleaning, maintenance, and replacement of worn or damaged PPE.

Area 2 – Machinery and Equipment Safety

1. **Compliance with technical requirements** – Machines and technical devices used at work must ensure safe and hygienic working conditions and protect employees from injuries, chemicals, electric shocks, noise, vibrations, and radiation. New machines must have an EU declaration of conformity, CE marking, and an operating manual.
2. **Safeguards and guards** – Machines that do not meet safety requirements must be fitted with appropriate protective devices. Moving parts (belts, gears, chains) must be covered or equipped with protective devices so that removing, opening, or deactivating the guard results in immediate machine shutdown.
3. **Control systems** – Control devices must be well-marked, easily identifiable, and may not create hazards. Each machine must have a component intended for safe stopping; the stop system takes precedence over other control systems. Machines that require it due to hazards and stopping times must be equipped with an emergency stop device.
4. **Operation and maintenance** – Only trained personnel may operate machines. Servicing may only be performed by competent staff in accordance with instructions. Damaged machines must be immediately shut down, disconnected from the power supply, and marked; repairs must be conducted under safe conditions.
5. **Workstation organization** – Machine installation sites and methods of use must minimize occupational risks by ensuring sufficient space, ergonomic workplace layout, and safe material supply and removal. Machines operated by teams must be equipped with warning signals (acoustic or visual) indicating machine start-up.
6. **Company-specific equipment** – The Company uses, among others, welders, cutters, drills, plasma devices, band saws, cranes, and forklifts. For each type of equipment, detailed OHS instructions have been developed, covering requirements for safeguards, technical condition inspections, start-up and shutdown procedures, material handling, and the use of appropriate PPE (e.g., welding masks and filters for welders, eye and face shields for drills, barriers and acoustic signals for cranes, seat belts and anti-tip systems for forklifts). Instructions are updated based on risk assessments and manufacturers' requirements.

Area 3 – Emergency Preparedness and Incident Management

1. **Emergency plan** – Each Company location has a documented emergency response plan (fire, explosion, chemical spill, technical failure, employee accident). The plan defines:
 - potential emergency scenarios identified during risk assessment,
 - the organization of the alarm system (sound and light signals), evacuation routes and assembly points,
 - assignment of roles and responsibilities (emergency coordinator, evacuation teams, first-aid responders),
 - communication procedures with local rescue services and authorities,
 - a list of emergency equipment (first-aid kits, defibrillators, fire extinguishers, safety showers, chemical neutralizers) and their locations,
 - a system for documenting incidents, accidents, and “near-miss events,” as well as procedures for cause analysis and implementation of corrective measures.
2. **Emergency infrastructure** – In accordance with ILO guidelines, plants must be equipped with emergency infrastructure (alarms, first-aid kits, emergency lighting). The Company ensures the availability of:
 - alarm systems with emergency power supply,
 - evacuation lighting,
 - fire extinguishers appropriate to the fire hazard class (A, B, C, D, F) and distributed in accordance with PN-EN 3 standard,
 - first-aid kits and eye-wash stations,
 - spill control kits and chemical neutralizers.
3. **Evacuation** – Employee evacuation must not be delayed when the alarm sounds. Emergency exits must be easily opened, evacuation routes marked and unobstructed. The number of exits and the width of evacuation routes must be appropriate to the number of employees and the nature of the building.
4. **Accident response** – After each accident or incident, medical assistance is provided, the site is secured, causes are analyzed, and preventive measures implemented. Accident documentation is prepared in accordance with regulations.
5. **Drills and training** – The Company organizes regular evacuation drills and first-aid training, as well as readiness tests for responding to spills, fires, and technical failures.

Area 4 – Fire Protection

1. **Fire prevention** – The Company identifies ignition sources (welding, grinders, electrical installations, gas burners) and flammable materials (technical gases, oils, solvents). Preventive measures include:
 - applying hot work procedures and issuing hot work permits,
 - maintaining order and cleanliness, removing flammable waste and dust,
 - regular inspections of electrical and fire installations,
 - safe storage of flammable substances in accordance with manufacturers’ instructions and legal regulations.
2. **Building protections** – Company facilities are equipped with fire protection systems: fire extinguishers, hydrants, fire detection and alarm systems, sprinkler systems (where required), and evacuation lighting. These systems are maintained in working condition and undergo regular inspections.
3. **Fire protection training** – Employees are trained in the use of fire extinguishers, identifying types of fires, notifying emergency services, and evacuation procedures.
4. **Fire instructions and evacuation plans** – Fire safety instructions and evacuation plans are posted in visible places. Evacuation signs and instructions comply with Polish Standards.

5. **Cooperation with the State Fire Service** – The Company maintains contact with the local fire brigade, consults evacuation plans, and organizes joint exercises.

Documentation and Policy Review

- **Documentation** – All procedures, instructions, and risk assessment results are archived.
- **Policy review** – The Policy is reviewed periodically (at least once every two years) and updated when legal, standard, or operational changes occur.
- **Communication** – The document is available to employees, contractors, and stakeholders.

Final Provisions

This Policy has been approved by the Management Board of POL-MET Sp. z o.o. and enters into force on the date of its announcement. Implementation of the Policy's provisions is the duty of every employee. Management monitors compliance and provides resources for the systematic improvement of working conditions.

Prezes Zarządu

Piotr Polkowski



POL-MET Sp. z o.o.

Warszawa, Al. Niepodległości 124 lok. 8
02-577 Warszawa
NIP: 821-264-71-01, REG: 364690209
KRS 0000962541