

"Kazakhstan Temir Zholy"
Ultyk companyy" shareholder kogamy
Joint-stock company National Company "Kazakhstan Temir Zholy"

Attachment 1
to the decision of the Board
joint-stock company
"National company
"Kazakhstan Temir Zholy"
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**Guidelines for the management system of health protection and ensuring
labor safety in the joint-stock company "National Company" Kazakhstan Temir
Zholy" and its subsidiaries**

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1. Introduction

1. Guidelines for the management system of health and safety in the joint-stock company "National Company" Kazakhstan Temir Zholy "and its subsidiaries developed in accordance with the requirements of the international standard ISO 45001 "Management systems for health and safety" and the interstate standard GOST 12.0.230 "System of labor safety standards. Occupational safety management system. General Requirements" and is the main document that regulates the activities for the management of health and safety in the group of companies of JSC "NC "KTZ".

2. The health and safety management system is aimed at ensuring the safety and health of employees of the Company's group and contractors, visitors and other stakeholders who are affected by hazards associated with the activities of the Company and its subsidiaries.

3. The Guidelines apply to the Company and its subsidiaries.

4. The Manual is mandatory for all employees of the Company and subsidiaries.

2. CONCEPTS AND ABBREVIATIONS

5. The following basic terms and abbreviations are used in this Guide:

Audit - a systematic, independent and documented process of obtaining objective evidence and its objective assessment in order to determine the degree of compliance of the management system of a group of companies JSC "National Company "Kazakhstan Temir Zholy" to the established requirements;

Verification - a set of measures taken to establish compliance with the real, true state of activity (work), production with the requirements of regulatory legal acts of the Republic of Kazakhstan, regulatory and technical documentation, standards and local acts of the Company;

Internal control on safety and labor protection - inspections and audits carried out by the responsible joint ventures of the Company and subsidiaries in the field of labor safety and labor protection;

Continual improvement - the process of improving the health and safety management system to achieve improved health and safety performance consistent with the organization's health and safety policy;

Corrective action - action taken to eliminate the cause of the nonconformity and prevent its recurrence;

Employee - an individual who is in an employment relationship with NC KTZ JSC or its subsidiary and directly performs work under an employment contract;

JSC “NC “KTZh”, Company – Joint-Stock Company “National Company “Kazakhstan Temir Zholy”;

Group of companies JSC "NC "KTZ" - JSC "NC "KTZ" and its subsidiaries;

Security - no unacceptable risk;

Occupational safety - the state of protection of employees, ensured by a set of measures that exclude the impact of harmful and (or) dangerous production factors on employees in the course of labor activity;

Occupational health and safety management system - a set of interrelated or interacting elements that establish policies and goals in the field of health and safety at work and procedures to achieve these goals;

OZ and OBT - health protection and labor safety;

Shutdown of unsafe work - the process of exercising the right to stop work and implies stopping, notifying, correcting and resuming work in order to solve an existing problem;

Industrial safety is a management system that includes processes for protecting health and ensuring labor safety, environmental management;

Industrial Safety Service - structural units at all levels of management of the Company and subsidiaries, whose functions include ensuring the implementation of the Company's policy in the areas of industrial safety;

Hazard - a source, situation or action that carries a potential threat of injury or ill health, or a combination of them;

Risk is a combination of the likelihood of a hazardous event or impact(s) occurring and the severity of injury or ill health that may be caused by the event or impact(s);

Network level subdivision - a subdivision of the Company that is directly subordinate to the management of the Company in accordance with the local act of the Company;

Regional level subdivision - a subdivision of the Company, whose activities are coordinated by a subdivision of the network level in accordance with the regulation on the subdivision of the network level;

Line level subdivision - a subdivision that is operationally subordinate to a subdivision of the regional level in accordance with the regulation on the subdivision of the regional level;

Structural divisions - departments, branches, affiliated staff, representative offices of the Company, including those located outside the Republic of Kazakhstan.

3. Health and safety policy

6. The Company has approved the Policy of the Joint Stock Company "National Company "Kazakhstan Temir Zholy" - Corporate Ideology and Business Philosophy, according to which the Company undertakes to prevent injuries and deterioration in the health of employees, as well as other stakeholders who may be exposed to hazards associated with activities carried out by the Company.

7. The company applies advanced domestic and foreign experience to improve the level of health and safety.

8. In accordance with the concluded agreements, the Company requires its contractors, clients and partners to comply with all standards and norms in the field of safety and labor protection adopted in the Republic of Kazakhstan and in the Company.

4. Organizational roles, responsibilities and authorities

9. Responsibilities for the protection of health and safety between the management of the Company are determined by the Chairman of the Management Board of the Company in accordance with the act "On the distribution of duties and areas of authority".

10. The Deputy Chairmen of the Management Board, managing directors of the Company and the first heads of structural divisions of the Company and subsidiaries, within their powers and competencies, are responsible for organizing work to protect health and ensure labor safety, and implement measures to manage risks in the field of labor safety and protection.

11. The Chief Engineer of the Company is responsible for the management of activities to ensure, form and maintain the health and safety management system in the Company.

12. Maintaining the health and safety management system in the Company in working order, coordinating the activities of all structural divisions of the Company and subsidiaries in the field of health and safety is carried out by the industrial safety service at the level of management of the Company's group, while the responsibility of this service is distributed as follows: in terms of meeting the requirements of the corporate of the Company's policy - is assigned to the Inspectorate for labor safety and ecology, in terms of improving the health and safety management system - to the Department of industrial safety and ecology.

13. Management in the field of health and safety in the structural subdivisions of the Company and subsidiaries is carried out by the heads of structural subdivisions and subsidiaries of the Company, who in the managed subdivision and subsidiaries organize work, the implementation of planned activities, the execution of instructions

from state regulatory and other inspection bodies for violation of legislation in the field of industrial safety .

14. Functional duties on health and safety issues, the rights and responsibilities of each employee of the structural unit of the Company and subsidiaries are contained in the job description, as well as in the local acts of the Company and subsidiaries, which employees of the Company and subsidiaries should be familiar with.

15. Responsibility for the development, timely adjustment, updating and implementation of measures in the field of OSH and OSH (including corrective and preventive ones), as well as for the collection and provision of analysis of OSH and OBT indicators by type of activity rests with process owners at all levels of management .

5. Consultation with workers and their participation

16. Consultations include a two-way exchange of information, including dialogue and exchange of views, which are achieved through functioning works councils, the corporate website and information portal of the Company, the use of a mobile application with feedback, holding production meetings, creating working groups to identify hazards and assess risks in the field of health and safety.

6. Legislative and regulatory requirements

17. The procedure for identifying regulatory legal acts and international standards containing rules, procedures, regulations, requirements aimed at preserving the life and health of the Company's employees in the course of their work is regulated by the Document Management Rules approved by a separate local act of the Company.

18. When developing, implementing and maintaining up-to-date documentation, technical processes and internal procedures, process owners take into account the requirements of legislative and regulatory acts of the Republic of Kazakhstan, as well as the requirements of local acts of the NC KTZ JSC group of companies based on the Register of requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of industrial safety.

19. The procedure for the formation of the Register of requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of industrial safety is regulated by the "Methodology for assessing the compliance of JSC" NC "KTZ" and its subsidiaries with the requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of industrial safety", approved by a separate local act of the Company.

7. Formation of goals in the field of health and safety

20. Branches of the Company and subsidiaries develop their own goals and objectives in the field of health and safety. When developing goals, objectives and plans for their implementation, the following are taken into account:

compliance with Company Policy;

results of hazard identification, assessment of risks and opportunities obtained in accordance with the standard "Identification of hazards, their assessment and risk management in the field of industrial safety in JSC" NC "KTZ" and its subsidiaries, approved by a separate local act of the Company;

legal and regulatory requirements;

the results of the analysis of the performance of the Company and subsidiaries in the field of health and safety;

results of behavioral audits, shutdown and non-consequence analyzes;

financial and production capabilities of departments and subsidiaries;

analysis of non-compliance with legal and regulatory requirements;

analysis of injuries, illnesses and incidents;

tasks to improve business processes and structures in the field of health and safety;

offers from employees and contractors.

21. Target indicators of the health and safety management system should be meaningful, measurable and achievable, have a temporary limitation.

22. Target indicators of the network level of management are agreed with the industrial safety service of the management level of the Company's group and approved by the head of the Company in charge of the network level subdivision.

23. Targets for regional level units are approved by the process owner of the network level unit.

24. Targets for line level units are approved by the process owner of the regional level unit.

25. The basis for updating the target indicators of health and safety may be both the degree of their achievement, and changes in the requirements imposed by the legislation of the Republic of Kazakhstan.

26. Responsible for ensuring the formation of goals in the field of health and safety, their updating, as well as bringing the goals to the involved structural units

and subsidiaries are the owners of the processes of the corresponding level of management.

27. The Chief Engineer of the Company is responsible for the formation of the Company's goals in the field of health and safety at the level of management of the group of Companies.

8. Planning

28. To achieve the goals in the field of health and safety, plans are being developed in the structural divisions of the Company and subsidiaries.

29. Plans for achieving goals are formed in accordance with the "Rules for the development and monitoring of the implementation of an action plan in the field of industrial safety in JSC "NC" KTZ "and its subsidiaries", approved by a separate local act of the Company.

30. Planning of health and safety activities is inextricably linked with the overall planning cycle in the Company and its subsidiaries and takes into account the need to:

a) ensuring compliance with the regulatory legal acts of the Republic of Kazakhstan, international agreements, international standards, requirements of industry standards and norms governing the activities of the Company and its subsidiaries in the field of labor protection, industrial safety, electrical safety, and the collective agreement concluded between the Company and its labor collective;

b) identification of hazards, assessment of risks and opportunities;

c) certification of production facilities for working conditions, aimed at preventing industrial injuries and occupational diseases in accordance with the Rules for mandatory periodic certification of production facilities for working conditions, approved by the regulatory legal act of the Republic of Kazakhstan;

e) conducting spring and autumn inspections of farms;

f) formation of action plans aimed at improving working conditions and safety.

31. The formation and distribution of resources (financial) is prioritized based on the results of risk assessment. First of all, measures aimed at reducing critical risks are subject to financing.

32. It is prohibited to exclude from budgets and action plans and / or postpone to a later date the implementation of projects aimed at ensuring safety and labor protection, except in cases where their irrelevance has been objectively proven due to the introduction of new equipment or technology.

33. The formation of the budget of the Company and its subsidiaries is carried out in accordance with the Rules for the development, approval, approval, adjustment, execution and monitoring of the implementation of development plans for subsidiaries of the National Welfare Fund Samruk-Kazyna joint-stock company, approved by the act of the National Welfare Fund Joint-Stock Company Samruk-Kazyna”, and the Rules for the development, approval, approval, monitoring of execution, adjustment of development plans and budget of subsidiaries of the National Company “Kazakhstan Temir Zholy” joint-stock company, approved by the decision of the Board of JSC “NC “KTZh”.

9. Competence, training and awareness

34. The company and subsidiaries determine the necessary competence of personnel in accordance with the List of positions (professions) of railway workers and the qualification requirements for them, as well as the relevant qualification reference books approved by the authorized body, professional standards.

35. Structural divisions of the Company and subsidiaries provide professional training, retraining, advanced training of employees and monitoring of professional development and training, including the effectiveness of training in accordance with the Rules for organizing professional development and training, approved by a separate local act of the Company.

36. Qualification of personnel is ensured through advanced training courses, seminars, trainings, internships, scientific and practical conferences, symposiums, exhibitions, forums and olympiads.

37. Training and testing of knowledge of employees on safety and labor protection issues are carried out in accordance with the Rules and terms for training, instructing and testing knowledge on safety and labor protection of employees, approved by an act of the authorized labor body.

38. In order to comply with labor protection requirements, the Company and subsidiaries carry out technical training in accordance with the standard “Organization and conduct of on-the-job training for employees of NC KTZ JSC and its subsidiaries”, approved by a separate local act of the Company.

39. Professional training, retraining of specialists, workers of hazardous production facilities on industrial safety issues is carried out in accordance with the Law of the Republic of Kazakhstan "On Civil Protection".

40. The preparation and procedure for testing knowledge on electrical safety issues is carried out in accordance with the Rules for conducting internal monitoring of the state of electrical safety and the technically sound maintenance of electrical

installations in NC KTZ JSC and its subsidiaries, approved by a separate local act of the Company.

41. Qualification testing of knowledge, managers and specialists of structural divisions of the Company and its subsidiaries engaged in the transmission and distribution of electrical energy is carried out in accordance with the Rules for conducting qualification tests of knowledge of the rules of technical operation and safety rules of managers, specialists of organizations engaged in the production, transmission and distribution of electrical energy. and thermal energy and their verification for the purpose of energy supply, to monitor the technical condition and safety of operation of electrical and power plants, approved by the regulatory legal act of the Republic of Kazakhstan.

42. For employees of the Company and subsidiaries, as well as third parties who are allowed to work at the facilities of the Company and subsidiaries, briefings are held in accordance with the Rules and terms for training, instruction and testing knowledge on safety and labor protection of employees, approved by an act of the authorized body by labor.

43. Staff awareness is achieved through functioning works councils, the corporate website and information portal of the Company, using a mobile application with feedback, and holding production meetings.

10. Motivation

44. Motivation of personnel in the field of health and safety serves as a tool for developing a safety culture in the Company, and is regulated by the Rules of moral encouragement in the joint-stock company "National Company "Kazakhstan Temir Zholy", the Rules for remuneration and bonuses in the joint-stock company "National Company "Kazakhstan Temir Zholy" , as well as local acts of DOs. In addition, there is a practice of issuing certificates of trust.

45. Each structural subdivision of the Company and subsidiaries regularly celebrates and publicly encourages its employees for the best results in labor safety.

11. Communication

46. As part of the operation of the OHS and OBT system, the Company, its structural divisions and subsidiaries interact with each other, as well as with contractors, authorized bodies, the public, employees of the Company, railway administrations of other countries, international organizations and others.

47. The list of issues and the timing of both internal and external communication are stipulated by the acts of the Company, given in section 13 of this Guide.

48. Communications are carried out through correspondence, direct contacts, meetings, publications, electronic channels and mobile applications, telephone means of communication and other means of communication, both on paper and electronic media.

49. Feedback on health and safety issues can be provided both through the specified channels and through the hotlines listed on the Company's website, and in other ways that do not contradict the legislation of the Republic of Kazakhstan.

50. Separate information materials and documents on health and safety issues are posted on the Company's corporate information portal (CIP) and are updated as they are updated.

12. Documented information

51. The documentation of the health and safety management system of the Company and its subsidiaries includes the Company's Policy, the Guidelines for managing the group of companies of NC KTZ JSC, these Guidelines, rules, instructions and methods, regulatory and technical documentation and other local acts of the Company, subsidiaries, documents collegial bodies, including working groups, aimed at fulfilling the requirements of regulatory legal acts of the Republic of Kazakhstan in the field of labor safety.

52. Methods for managing documentation and records of the OH&S management system are defined in the Documentation Management Rules at NC KTZ JSC and the Documentation Rules at NC KTZ JSC, approved by a separate local act of the Company.

13. Operations management

53. The Company and subsidiaries have established procedures and defined criteria for the implementation and management of OSH and OSH operations, the absence of which could lead to deviation from the Company's Policy, goals and objectives.

54. The process of operations management is implemented by a set of measures to define goals, establish requirements for their achievement, analyze performance and implement control actions to achieve the target level of safety and improve it.

55. Procedures for managing operations and risks are regulated and implemented in accordance with the regulatory legal acts of the Republic of Kazakhstan, local acts of the Company, subsidiaries in the field of health and safety.

56. Operations management procedures are recorded in management system documents such as:

- a) register of hazards and risks;

- b) rules and instructions for labor protection;
- c) the procedure and regulations for the performance of certain types of work (technological maps, technological processes);
- d) work permit (use of the system of work permits for performing hazardous types of work).

57. In order to change the behavior of an employee during the performance of a production task and eliminate dangerous actions and conditions that can lead to injuries, regular behavioral dialogues and observations are held in each division of the Company and subsidiaries in accordance with the Rules for Organizing a Behavioral Safety Dialogue in the Joint-Stock Company National company "Kazakhstan temir zholy" and its subsidiaries". At the same time, each employee has the right to stop unsafe work.

58. In order to comply with the purchased goods, works and services with the safety requirements specified in the contracts, the Company applies the Rules for managing the procurement activities of the National Company "Kazakhstan Temir Zholy" joint-stock company and organizations, fifty or more percent of voting shares (participatory interests) of which are directly or indirectly owned by NC KTZ JSC on the basis of ownership or trust management, approved by the Management Board of the Company.

59. The health and safety management system includes a methodology for classifying incidents, reporting, investigating and detailed analysis of incidents in the form of violations, potentially dangerous incidents without any consequences, technological incidents, accidents in accordance with the standard "Incident management with the definition of their root causes in the joint-stock company "National Company "Kazakhstan Temir Zholy" and its subsidiaries", approved by a separate local act of the Company.

60. Risk management in the field of health and safety is carried out in accordance with the standard "Identification of hazards and environmental aspects, their assessment and risk management in the field of industrial safety in JSC" NC "KTZ" and its subsidiaries, approved by a separate local act of the Company.

61. To minimize the emergence of new health and safety hazards and risks, hazards are identified, assessed, and subsequently managed.

62. Occupational safety management in the performance of work for the Company and subsidiaries by contractors is carried out in accordance with the standard "Safety management in the performance of work by contractors in the National Company Kazakhstan Temir Zholy JSC and its subsidiaries", approved by a separate local act of the Company.

63. Responsibility for monitoring the use of the prescribed risk management measures at workplaces, for maintaining workplaces in a safe condition is assigned to the heads of structural divisions of the Company and its subsidiaries.

14. Emergency preparedness and response

64. The unified procedure for preparedness and response to emerging emergencies is carried out in accordance with the requirements of the regulatory legal acts of the Republic of Kazakhstan in the field of civil protection and the standard "Prevention and elimination of emergency situations in the National Company" Kazakhstan Temir Zholy "JSC and its subsidiaries", approved by a separate local act of the Company.

65. Emergency preparedness and response procedures include:

planning activities to identify, prevent and eliminate the consequences of emergency situations;

training of all personnel at all levels of management, actions in cases of emergency situations (schedules for conducting drills and training sessions, creating a headquarters for eliminating the consequences of emergency situations);

provision of adequate means for liquidation of emergency situations;

informing at all levels of government and establishing communication with the relevant competent authorities, the public and emergency services.

periodic assessments of the compliance of the emergency prevention and liquidation system with the established requirements.

organization and functioning of the operational headquarters for the elimination of the consequences of emergencies.

15. Assessment of conformity of activities

15.1 Monitoring, measurement, analysis and evaluation

66. The objectives of the monitoring process are:

implementation of activities, programs and plans in the field of health and safety;

prevention and minimization of accidents;

ensuring the safety of production processes at hazardous production facilities;

timely identification of hazards and associated risks.

67. To monitor, analyze and assess the state of health and safety at all levels of management of the Company and subsidiaries, information is recorded and collected,

information is summarized and reports are submitted to the management of the Company and subsidiaries.

68. Reporting is a tool for internal monitoring and the basis for subsequent analysis and evaluation of the performance of the OSH management system.

69. The main principles of health and safety monitoring are implemented by ensuring compliance with the requirements of the RoK regulatory legal acts, local acts of the Company, subsidiaries, the implementation of health and safety measures aimed at reducing harm to human health, the production process and the facility.

70. Accounting for cases of violations in the field of health and safety and reporting on them are provided in the forms established by the regulatory legal acts of the Republic of Kazakhstan, the standard "Management of incidents with determination of their root causes in the joint-stock company" National Company "Kazakhstan Temir Zholy" and its subsidiaries" approved by a separate local act of the Company.

71. Within the established time limits, the divisions of the regional, linear levels of the Company and its subsidiaries provide reports of the established form to the territorial divisions of the authorized state body, the management of the levels of regional, network management, as well as to the management level of the Company's group in accordance with the Rules for the development and monitoring of the implementation of the action plan in the field of industrial safety in JSC "NC "KTZ" and its subsidiaries, approved by a separate local act of the Company.

72. Reporting on the effectiveness of the health and safety management system is heard:

1) at the level of management of the Company's group - at the Board of Directors of the Company with the frequency established by the Sole Shareholder.

2) at the network management level:

monthly - according to a separate schedule at a meeting with the heads of the network division of the Company and subsidiaries or using mass media;

quarterly - at meetings to hear the reports of process owners from the Company's management or using mass media;

according to separate schedules - from the Chairman of the Management Board of the Company.

3) for the regional and linear levels of management, the frequency and reporting procedure is established by the owners of processes at a higher level of management.

The results of the hearings are drawn up in the form of protocols signed by the person who received the report, after agreement with the heads of the supervising enterprises of the Company's group.

73. Reports are input data for the analysis of the activities of the Company and subsidiaries in the field of health and safety.

15.2 Conformity assessment

74. The Company and subsidiaries evaluate compliance with the requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of OHS and OBT.

75. Every year, at all levels of management of the Company and subsidiaries, an assessment is made of compliance with the requirements of regulatory legal acts of the Republic of Kazakhstan and local acts of the Company in accordance with the "Methodology for assessing the compliance of the activities of JSC" NC "KTZ" and its subsidiaries with the requirements of the legislation of the Republic of Kazakhstan and other regulatory requirements in the field of industrial safety ".

The results of the assessment of compliance with the requirements of the regulatory legal acts of the Republic of Kazakhstan and local acts of the Company in the field of health and safety are input data for the analysis of the state of health and safety by the management of the Company and subsidiaries.

76. The list of legislative and regulatory requirements in the field of health and safety is formed and updated in accordance with Section 7 of this Guide.

16. Internal control

77. Internal control on health and safety is carried out in order to comply with the established requirements for safety and labor protection in the workplace and take immediate measures to eliminate detected violations.

78. Internal control in the structural divisions of the Company and its subsidiaries is carried out in accordance with the standard "Organization of internal control of activities in the field of industrial safety in the joint-stock company" National Company "Kazakhstan Temir Zholy" and its subsidiaries", as well as the Rules for planning and conducting internal audit in the group of companies JSC "NC" KTZ ".

79. Based on the results of internal control, the heads of structural divisions of the Company and its subsidiaries take measures to improve activities in the field of health and safety.

17. Performance analysis

80. Analysis of the state of health and safety is reviewed once a quarter at all levels of management of the Company and its subsidiaries.

81. The main input data for the analysis of the functioning of the health and safety management system and the preparation of relevant information for the Company's Management are:

- the status of actions based on the results of the previous analysis;
- changes in internal and external issues related to health and safety;
- needs and expectations of interested parties;
- results of internal and external control;
- the results of the assessment of compliance with legal and other applicable requirements;
- needs and expectations of interested parties;
- internal reporting;
- analysis of the implementation of target and planned indicators in the field of safety;
- information about incidents, nonconformities and corrective actions and continual improvement;
- risks and opportunities;
- consultations of workers and their participation in the management of health and safety;
- resource support for the functioning of the health and safety management system;
- reports on corrective and preventive measures, effectiveness of measures;
- external circumstances, including legal requirements and other requirements applicable to the activities carried out;
- information from external stakeholders, including complaints;
- information about opportunities for improvement.

82. The results of the health and safety review provide the basis for continual improvement and include:

- conclusion regarding the continued suitability, adequacy and effectiveness of the health and safety management system in achieving the intended results;
- confirmation of the possibility of continual improvement;
- identified needs for changes in the health and safety management system;
- resource requirements;
- decisions on the degree of integration of the health and safety management system with other business processes;

- proposals concerning the strategic direction of the Company's development.

83. Top management analyzes the health and safety management system on an annual basis at meetings with the Chairman of the Board of the Company dedicated to summing up the results of the Group of the Company for the year, in accordance with the requirements of the Guidelines for the management of the group of companies of the National Company "Kazakhstan Temir Zholy" Joint-Stock Company, approved by a separate local act of the Company.

84. Top management analyzes the health and safety management system in order to:

assessing the relevance, application and effectiveness of the management system and determining the necessary corrective and preventive actions to improve it (improvement);

assessing the needs for changes in the health and safety management system, the Company's policy, and strategic goals.

18. Continuous improvement

85. Improving the health and safety management system is a constant work through control actions, which includes, among other things, corrections and corrective actions, the results of which are expressed in an increase in the level of labor safety.

86. The Company conducts a systematic evaluation of the effectiveness of the OSH and OBT processes, searches for areas of possible improvement, in order to develop and implement corrective measures in these areas.

87. Decisions to review the organization of the OHS and OBT management system are taken by the Company's Management based on the results of an analysis of its functioning. The result of improving the management system may be the adjustment of its elements (goals, objectives, structure, distribution of powers and responsibilities, allocated resources, procedures, etc.).

88. Evaluation of the effectiveness of the health and safety management system is carried out by the Committee for Safety and Environmental Protection of the Board of Directors of the Company for a preliminary and comprehensive study of issues and preparation of recommendations for a decision by the Board of Directors of the Company.