

Basic HSE requirements for contractors at the sites of ALTEO Nyrt.



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1 General requirements

The Contractor undertakes to

- strictly comply with the laws in force at all times, as well as with the HSE regulations (health and safety, fire and environmental protection, traffic rules, etc.) constituting an inseparable annex of effective contracts or individual orders (hereinafter: Contract) at the Hungarian sites, facilities and leased premises of ALTEO Nyrt. (1033 Budapest, Kórház utca 6-12) (including solar power plants and wind turbines located in non-residential areas).
- provide to those performing work the required personal, material and environmental conditions to work safely without risk to their health.
- check compliance with the relevant laws and the existence of safe and non-hazardous working conditions within the framework of regular inspections, and, if necessary, ensure that any identified deficiencies are rectified.

When fulfilling the order, the Contractor may involve subcontractors only upon prior written notification with the written approval of the Customer.

If the Contractor wishes to employ a subcontractor (contributor), it undertakes to have the subcontractor strictly comply with the HSE regulations in force at the sites of ALTEO Nyrt. The Contractor shall hand over the HSE regulations to be observed to its subcontractors and familiarize them with the contents thereof in a documented manner. Subcontractors may only start work after they have familiarized themselves with the HSE regulations to be observed and accepted such regulations as binding on them.

The Contractor is responsible for subcontractors used as if the relevant work had been performed by the Contractor.

The Contractor must take all necessary measures to ensure that the materials and procedures used during the performance of its activities do not threaten the health and safety of the persons who perform the activities and who are within the scope of the work, or the security of the natural and built environment, and do not cause damage to ALTEO Nyrt.

Any questions in connection with the HSE requirements related to the fulfillment of the Contract or the order must be directed to the contacts specified in the Contract or the order, who will provide the Contractor and/or its subcontractor an opportunity to clarify any HSE-related questions that have arisen (e.g. hazards at the site, evaluation on HSE plans, interpretation of MOL HSE rules, etc.).

1.1 Definitions

Subcontractor: A contractor signing a construction contract with the customer contractor.

Accident: a one-off external impact on the human body that occurs suddenly or within a relatively short period of time, regardless of the will of the injured person, and causes injury, poisoning or other health impairment (physical or mental) and/or death.

Brownfield work: any work performed at the sites of ALTEO Nyrt. but not affecting or being related to the operating technology, where the area of the work can be clearly distinguished from the area of the operating technology system.

HSE: Acronym made up of the components Health, Safety and Environmental Protection, used by ALTEO Nyrt. to refer to health and safety, fire and environmental protection activities and this subject in general.

HSE critical activity: work representing a significant risk in itself or performed under special conditions.



HSE Coordinator: Safety and health protection coordinator (hereinafter: coordinator): The work done by the coordinator during the construction activity is a professional occupational safety activity. The main task of the coordinator is to coordinate the activities of those working together on the building and construction (subcontractors) in terms of safety in time and space and to prevent the occurrence of high-risk situations.

Personal protective equipment: personal protective equipment (hereinafter: protective equipment) means any device, equipment, appliance or tool intended to be worn or used by a person to protect against health or safety hazards.

Inspection: both the Occupational Safety and Health Authority and the employer have the right to monitor the conditions and implementation of safe, non-hazardous work through regular or extraordinary HSE inspections (even without prior notice).

Responsible Technical Leader: Pursuant to Section 13 of Government Decree No. 191/2009 (IX. 15.), the construction and installation work performed in the construction work area is supervised by a responsible technical manager. The activity of the responsible technical manager covers the supervision of the whole or a specific part of the construction activity undertaken in the construction contract of the contractor.

General Contractor: A contractor signing a construction contract with the builder, named in the contract, and performing construction activities.

Participants in the process of construction, maintenance, repair, etc. activities: to be defined in the relevant contracts and orders.

Risk: the combined effect of the likelihood and severity of injury or impairment to health in an emergency.

Establishment: the process resulting in a new plant or workplace, or that of renovating, extending, converting an existing one, or the installation of machinery, irrespective of whether these are used for productive or non-productive purposes after their completion.

Work accident: an accident suffered by an employee in the course of or in connection with his/her organized work, regardless of its location, time or the extent of the (injured) employee's contribution.

An accident is deemed to occur in connection with the work if the employee suffers an accident while using transport related to work, receiving or handling materials, cleaning, company canteens, occupational health services or any other services provided by the employer in connection with the work.

Working clothes: clothes protecting or replacing the employee's own clothes from increased wear and tear and contamination resulting from the activity

Supervisor: See Section 4

Contractor: A contractor who carries out construction activities on a commercial basis and who, based on its position in the construction chain or in the respective contract, may be a general contractor, a customer contractor, or a subcontractor.

Protective clothing: personal protective equipment that provides protection against physical, chemical or biological hazards that may endanger the health or physical integrity of the employee during work.

The protection capacity of specific items of protective clothing is defined by standards and norms.

Greenfield work: any work that:

- is performed outside the sites of ALTEO Nyrt., or in an area where no industrial activity has previously taken place and no infrastructure has been previously established (usually areas removed from agricultural cultivation). This type of work typically involves construction activities.
- is performed at the sites of ALTEO Nyrt. where no operating technology is present
- is performed in an area leased by ALTEO Nyrt. where no industrial activity has previously taken place



2 Preconditions for starting work

2.1 Work permit

On the premises of ALTEO Nyrt. and its respective subsidiaries within the meaning of Section 3(2)(2) of Act C of 2000 on Accounting, not including FE-GROUP INVEST Zrt. (hereinafter jointly: "ALTEO Group" or "Customer"), work may only be performed **in possession of a valid and effective work permit** issued by ALTEO Group, which may be issued under the following conditions:

- A valid and effective contract or order for the work.
- The supervisor appointed by the Contractor possesses a valid Supervisor's Certificate.
 <u>Before commencing work</u>, the supervisor reviews the HSE material compiled by ALTEO Nyrt.
 through E-Learning and takes a corresponding exam. If the exam is passed, a "Supervisor's Certificate" is issued, which entitles its holder to apply for a work permit.
 Exceptions are detailed in Section 2.1.1.
- The Contractor has a proper preliminary occupational health and safety risk assessment for the work to be performed <u>in accordance with the relevant regulations</u> (see Section 2.2)

 The risk assessment must cover the risks and risk factors of the work equipment used, the activity to be performed and the work environment. Based on the risk assessment, the Contractor determines the necessary personal protective equipment and the necessary risk mitigation measures.
 - The risk assessment is used by the issuer of the permit to prepare the work permit, and, where necessary, it is supplemented or amendments are suggested.
- The material, personal and HSE conditions of the work are ensured

2.1.1 Exceptions, special situations

(Sample: Annex 2)

During all work classified as greenfield work, after handing over the work area, work is authorized under the responsibility of the Contractor, according to its own procedure. This is determined by the work area handover protocol or the SHPP.

2.2 Obligation to prepare a risk assessment

2.2.1 Simplified occupational health and safety risk assessment

The Contractor must prepare a simplified occupational health and safety risk assessment if the work he performs is regarded as extremely risky, or if the Customer requests this in advance.

The risk assessment must be prepared on the basis of the form and sample provided by ALTEO Nyrt.

The simplified occupational health and safety risk assessment consists of three main parts (see Annex

- 2):
- 1. Contractor details, which must be filled in by the Contractor(s), providing information about themselves and their subcontractors, and determining which activities within a given work will be carried out by which Contractor.
- 2. Part describing the hazards arising from the technology used for the work, for which preliminary information is provided by ALTEO Nyrt. during the preliminary site survey, providing details on the sources of physical threats and harmful substances arising from the technology.
- 3. The risks must be described in detail by the Contractor, identifying possible risks and the methods of protection against them based on the various steps of performing the activity (taking into consideration the sequence of activities). This is the part where the protective and safety devices to be used during the activity, as well as the methods and equipment for handling emergencies must



be specified. The steps of the work process must be described in such detail that the entire work process, the tools and protective equipment used can be identified.

2.2.2 Safety and Health Protection Plan (SHPP)

In the case of construction activities subject to an official permit, a **safety and health protection plan** must be prepared if

- the construction activity is expected to last longer than 30 working days, and more than 20 employees take part in it simultaneously, or
- the amount of the planned work exceeds 500 man-days, or
- several companies work on the realization of a given project at the same time and at the same place.

The plan must first be prepared at the design stage, and then it must be updated with possible changes at the implementation stage. When creating the content, the requirements of all relevant laws (currently Joint Decree No. 4/2002 (II. 20.) SZCSM-EüM), as well as the following criteria must be taken into consideration:

- · timeline of work processes,
- coordination of simultaneous work, the unique rules thereof,
- determination of activities to be performed only in a certain sequence,
- determination of protective equipment and measures,
- rules for preventing the entry of unauthorized persons.

The above-mentioned plan must be prepared by the safety and health protection coordinator (specialist entitled to perform work safety activities), who is also responsible for making the necessary amendments and checking compliance with its provisions during implementation. The General Contractor is responsible for the appointment and employment of the safety and health protection coordinator.

2.2.3 Comprehensive risk assessment (not simplified)

A comprehensive risk assessment must be carried out for construction projects that are not subject to an official permit, but

- the construction activity is expected to last longer than 30 working days, and more than 20 employees take part in it simultaneously, or
- the amount of the planned work exceeds 500 man-days, or
- several companies work on the realization of a given project at the same time and at the same place.

Attention: Risk assessments must be submitted for approval at least 3 working days before the actual commencement of the work. The Customer's authorized representative for the work site (issuer of the work permit) is entitled to evaluate the risk assessment. Upon request, the HSE organization of ALTEO Nyrt. will provide professional assistance during the evaluation procedure.

2.2.4 Extremely risky activities:

- 1. Work in confined spaces, unless the activity is limited to revision and inspection only (see more details in Annex 5)
- 2. Work involving a critical risk of fire
 - Work involving a critical risk of fire means an activity with a risk of fire carried out in the immediate vicinity of operating technology, as well as an activity generating such heat that may be an ignition source for the environment (see more details in Annex 4).
- 3. Lifting operations subject to a lifting plan and lifting operations carried out under special circumstances
 - Lifting operations carried out under special circumstances include lifting activities above operating technology, in confined spaces, and above buildings in which persons are regularly present (see more details in Annex 3).



- 4. First disassembly of dangerous devices, work involving the disassembly of pressurized parts of technological systems, and any activities where the release of hazardous substances is expected;
- 5. Work performed above ground level or under water involving the risk of falling in, falling down or submerging, if there is no established technical protection (see more details in Annex 7);
- 6. Parallel work performed by contractors, if they endanger each other's safety;
- 7. Other work involving an increased risk or performed under special conditions (particularly earthwork, see Annex 6), under a foil tent, in a plastic tunnel or in an area delimited in any other way, in an inert atmosphere), subject to the individual decision of the operator.

2.3 Personnel and material conditions for performing the work

2.3.1 Personnel conditions for performing the work

• The supervisors of the Contractor and/or the subcontractors may only enter the sites, facilities or leased premises of ALTEO Nyrt. to perform work after completing a valid ALTEO Nyrt. HSE training course and passing an exam. An HSE supervisor training course must be completed by all supervisors who are listed as supervisors in the work permit. The document proving that the exam has been successfully passed must be kept by the supervisor at the site. The HSE training and the exam are valid for one year and must be renewed before their expiry.

In the case of construction activities subject to an official permit or construction activities longer than 30 working days, excluding planned maintenance activities, before starting the activity, the Contractor's supervisor(s) must attend an HSE training course provided by ALTEO Nyrt. for the given project.

- The supervisor must familiarize the members of his or her work group with the HSE training material applicable to the facilities and leased premises of ALTEO Nyrt. and to the activity, who must, after the training, declare in writing that they have been made familiar with the HSE regulations of ALTEO Nyrt. and accept compliance with them as binding on them. The Employee's Declaration must be kept in the work area, and, upon request, it must be presented. Work can only be performed by persons who have attended the employee briefing and confirmed their attendance with their signatures.
- Work may only be performed by persons who are in a proper condition for work.

2.3.2 Material conditions for performing the work:

- The persons performing the work must have the personal protective equipment specified in the relevant legislation, risk assessment and work permit, and uniform work clothing with the Contractor's logo, covering their arms and legs.
 On the premises of ALTEO Nyrt., in the case of construction work where there is no direct risk of injury to the hands, arms or legs, short-sleeved work shirts (T-shirts) and work shorts may be acceptable if the corresponding risk assessment expressly permits this. Short clothing is not permitted in technological areas.
- The Contractor is responsible for determining, providing and checking the use of the protective equipment required for the activities based on the risk assessment. The Contractor must continuously ensure that the specified protective equipment is in good condition and provides full protection; in case of damage, the equipment must be repaired or replaced. The protection capacity of the protective equipment and, where required, the periodic inspections must be identifiable at the work site.
- Those performing the work may only use tools and work equipment that are suitable for performing the work and have been inspected in accordance with the relevant law.
 The documents certifying the inspections for non-hazardous and hazardous work equipment according to the laws in force at all times, currently Decree No. 10/2016 (IV. 5.) NGM and



Section 3 of Decree No. 5/1993 (XII. 26.) MÜM, respectively, must be available in the event of an audit by the HSE organization.

Depending on the work area and the activity, the Contractor must possess a sufficient number
of (rented or owned) gas concentration measuring instruments for the detection of the gases
defined in the corresponding permit. The instrument may only be operated by a person assigned
by the company who is familiar with its operation. A certificate must be available with respect to
the periodic inspection and calibration of the instruments.

2.3.3 Protective and work clothing, personal protective equipment to be used on a mandatory basis

Protective and work clothing, as well as personal protective equipment must be used in the technological areas of the sites of ALTEO Nyrt. on a mandatory basis.

2.3.3.1 Industrial power plants, heating power plants

- Industrial safety helmet (MSZ EN 397:2012+A1:2013, protection category 2)
- For activities where flammable and explosive liquids, gases, dust or vapor may be released to an extent causing danger, or are present, closed, antistatic, flame-resistant or flameproof protective clothing marked with the Contractor's logo (MSZ EN ISO 13688:2013, MSZ EN ISO 11612:2016, MSZ EN ISO 14116:2016, MSZ EN 1149-5:2019 protection category) 1*
- In other areas, closed, uniform work clothing with the Contractor's logo
- Type S3 closed work safety footwear (MSZ EN ISO 20345: 2022)
- In the area of BC Power Plant and BC Power:
 - o protective goggles
 - o full respiratory protection equipped with ABEK-CO-NO-Hg-P3 filter insert
 - safety helmet with chin strap are mandatory.

2.3.3.2 Hydropower plants, water treatment plants, solar power plants

- Industrial safety helmet (MSZ EN 397:2012+A1:2013, protection category 2)
- Uniform work clothing with the Contractor's logo
- Type S3 closed work safety footwear (MSZ EN ISO 20345: 2022)
- For work involving a risk of falling into or submerging under water, those performing the work must also be provided with automatically inflating life jackets. (hydropower plants)

2.3.3.3 Wind turbines

- Industrial safety helmet for rope access activities (EN 397, EN 50365, EN 12492)
- Uniform work clothing with the Contractor's logo
- Type S3 closed work safety footwear (MSZ EN ISO 20344: 2022; MSZ EN ISO 20345:2022; MSZ EN ISO 22568-1:2019)
- Due to the risk of falling from a height and falling in, full body harness (EN 361), fall protection system with a Y-strap energy absorber (EN 355, EN 353-1,2)
- For tasks where employees need to work in a specific position to ensure work safety during the work process, e.g. repair of lights in a tower, positioning lanyards are to be used (EN 358)
- 1* Note: At the sites and in the technological areas of BC Power Plant, BC Power, TVK Power Plant, it is always mandatory, not only for activities where such situations may occur.

<u>Attention:</u> At some sites, in addition to mandatory protective equipment, it is also mandatory to use the protective equipment prescribed by the displayed pictograms (noise protection earmuffs, protective gloves, protective apron against acids, alkalis, etc.).



2.4 Occupational health and safety conditions for work

- The Contractor must comply with the relevant provisions of the current occupational health and safety legislation in order to establish a safe workplace. Before commencing work, the Contractor must ensure appropriate working conditions for those performing the work based on the expected number of persons performing the work, the nature of the work, and the local circumstances (possibility of eating, changing clothes, providing first aid, etc.)
- For activities lasting more than three working days and performed with the employment of three
 or more persons at the same time, the Contractor must provide MOBILE TOILETS for its
 employees and Subcontractors, or, subject to individual agreement, they may use the toilets of
 the site or the mobile toilets made available to them by ALTEO Nyrt.
- The Contractor must ensure that its employees and Subcontractors arrive at the workplace in a proper condition for work and perform their work with the expertise and care that can be reasonably expected.
- The Contractor is liable for any damage caused by its employees or Subcontractors.
- If the supervisor has to leave the work site, he or she must appoint a deputy with the appropriate qualifications. If no deputy with the appropriate qualifications can be found, the work must be suspended.
- Where required by the nature of the activity, the Contractor must display in the assigned work
 area the security and health protection signs required by law in a clearly visible manner, check
 the existence of such signs, and properly maintain them.
- The Contractor must ensure that no unauthorized persons are present in the assigned work area.
- In areas classified as explosive, it is prohibited to wear shoes that may emit sparks and clothes made of synthetic fibers, and it is prohibited to bring ignition devices into such areas.
- If there is a change in the number of persons performing the work or in the personnel, the Contractor must report this fact to the issuer of the work permit and instruct new workers in connection with the HSE requirements in accordance with the applicable regulations.
- Every day, before commencing work, the Contractor must check in with the organization/person issuing the work permit.
- During the entire work period, the persons working in the work area must maintain order and cleanliness.
- If the Contractor working in the work area employs or uses the services of one or more subcontractors, fulfilment partners, contributors or work teams performing various activities, then the coordination of fire protection and occupational health and safety (the coordination of their activities) is the responsibility of the Contractor, who is legally responsible for these aspects.
- The Contractor is responsible for all occupational health and safety, fire protection and environmental protection activities of its subcontractors.
- The Contractor must store all materials and hazardous substances used, removed, prepared for installation, etc. during its activities in accordance with the relevant laws, standards and regulations.
- Smoking is only allowed in the designated areas. Smoking is prohibited at the sites of BorsodChem Zrt., BC Power Plant and BC Power.



- At the sites of ALTEO Nyrt., the regulations of the Highway Code apply, the maximum travel speed is 30 km/h.
- The Contractor must report all work accidents, accidents and injuries to the organization or
 person issuing the work permit; but the investigation of incidents, as well as other related tasks
 are the responsibility of the Contractor. If an incident needs to be investigated, the Contractor
 must inform, through the HSE contact person, its authorized representative for the work site of
 the results of the investigation and the measures implemented.
- To ensure safe and non-hazardous working conditions, the Contractor must take all security measures which are not listed here, but which can be reasonably concluded from the conditions of the work area and the nature of the task.
- If parallel work is performed by subcontractors under the control of the Contractor in the work area, it is the Contractor's responsibility to coordinate the parallel activities. If several Contractors perform work in the given work area, a person appointed by the Customer (ALTEO Nyrt.) is responsible for the coordination of parallel work.
 When applying for a work permit, the supervisor must request information from the issuer of the permit, and the issuer of the permit must provide information about the parallel activities performed in the area. In such cases, the supervisor must contact the supervisor of the group performing parallel activities and make sure that they do not put each other at risk through their activities.

2.5 Fire protection conditions for work

- Activities involving a risk of fire may only be carried out in possession of a permit for the given activity ("hot work permit").
- When determining the work area, suitable escape paths and routes must be designated. During
 work, these designated routes must be continuously monitored. It is PROHIBITED to block or
 narrow the escape routes or to store materials on them even temporarily.
- Depending on the work site, those performing the work must familiarize themselves with the alarm signals used at the given workplace and the measures to be taken in case of an alarm, which are presented by the authorized representative for the work site.
- As far as BorsodChem Zrt., BC Power Plant and BC Power are concerned: In the event of a siren signal or any other indication of danger, the activity being performed must be stopped, the gas mask kept available at the site must be put on, the work area must be brought to a safe state (switching off electrical equipment, cooling down hot surfaces, turning off gas cylinders, etc.), and the area must be left perpendicularly to the wind direction. The wind direction is indicated by wind bags.
- When performing activities involving a risk of fire, the Contractor must ensure that an inspected fire extinguisher with the required extinguishing agent is available.
- Occasional activities involving a risk of fire may be performed in accordance with the conditions specified in advance in writing based on the characteristics of the site. The conditions must be specified by the person giving direct instructions for the work or directly controlling the activity of persons performing the work.
- Welders and persons performing work involving open flames, as well as persons directly
 controlling their work must have a valid fire protection examination. The certificate of the fire
 protection examination must be kept on site.
- The hot work permit must be signed by a person appointed by the Customer, who may supplement the permit according to the specificities of the location



 The gas cylinders stored in the work area may be stored in accordance with the relevant legislation currently in force. At the place where the gases are used, only a number of gas cylinders containing the amount sufficient for a single gas replacement may be stored, in a device designed for this purpose.

2.6 Environmental conditions for work

- It is prohibited to bring materials or preparations with incomplete or damaged labels and/or packaging and/or unidentifiable materials or preparations to the location of the activity, the work area, or the technological area.
- The Contractor must selectively collect the hazardous and non-hazardous waste generated during the performance of the activity in appropriately sized collection containers in a way that the pollution of the environment is prevented. It is the responsibility, task and obligation of the Contractor to provide the collection containers.
- Unless otherwise provided in the contract, the Contractor must have a carrier possessing a valid license remove the generated waste and hand it over to a waste disposal facility possessing a valid license as its own production waste.
- The Contractor must document the waste collected and removed by it and hand over to the Customer the records and documents proving removal and destruction before completing performance of the contract.
- The Contractor must report any incidents generating environmental impact or pollution during the performance of the work to the Customer's environmental protection officer.
- The elimination of the consequences of incidents generating environmental impact or pollution during the performance of the work must be started right after they occur. All costs incurred must be borne by the Contractor.

2.6.1 Requirements for chemicals used

- When choosing and using hazardous substances and preparations necessary for its activities, the Contractor must consider the hazards of the relevant substance/preparation to be used, the hazards present at the location of the activity, in the work area and the technological area, as well as any interaction between them.
- During activities involving hazardous substances and preparations, the Contractor must keep
 the safety data sheets of the hazardous substances and preparations used at the work site or
 within easy reach (e.g. within the site).
- If the hazardous substance may impact the environment of the Operator (manager of the technological area where the work is performed) or a third party, the Contractor must inform the Customer accordingly before starting the activity.
- Where necessary, the conditions agreed by the Contractor and the Customer regarding the use
 of hazardous substances must be specified in the Work Permit.

2.7 Property protection conditions for work

- The Contractor and those performing work for it may only carry out the work in the manner and in the area specified in the contract concluded by the parties for the given work.
- It is prohibited to bring alcohol or narcotic substances into the work area.



- The Contractor accepts that the HSE specialists of ALTEO Nyrt. and the site managers may subject those performing work for the Contractor to breathalyzer tests during work.
- The Contractor accepts full responsibility for the actions of those performing work for it.
- The Contractor acknowledges that ALTEO Nyrt. operates a property protection security system (camera, alarm and access control system) and takes advantage of remote monitoring at its sites.
- The Contractor will receive information on individual property protection instructions for each location at the relevant site.
- The Contractor may only enter the site in the presence or with the permission of an employee of ALTEO Nyrt.
- The Contractor may enter the remotely monitored site without the presence of an employee of ALTEO Nyrt. only if the remote monitoring center is notified of this fact accordingly.
- At sites without permanent supervision and equipped with alarms:
 - typically when working in the area of solar power plants, the fence may be touched after deactivating the alarm system. Deactivation is performed by the remote monitoring center. The control lamps mounted on the fence allow the Contractor to verify the inactive status of the system.
 - typically when working in the area of wind farms, prior login to the remote monitoring center; the alarm can only be deactivated in the presence of, or by, an employee of ALTEO Nyrt.

2.8 Work area handover procedure

2.8.1 Simplified work area handover procedure

In the event of maintenance, repair, assembly and minor construction activities (non-SHPP work and work not subject to the preparation of a full risk assessment), the handover of the work area may take place after the work permit has been issued.

The process does not require separate documentation; the specifications for the use of the work area will be prescribed by the Customer in the work permit. The handover and acceptance of the work area takes place by means of a joint site survey, at which the Customer and the Contractor determine the boundaries of the work area, and the Customer (Operator) describes the hazards arising from the work area and the work environment.

2.8.2 Work area handover procedure for construction projects

In the case of construction projects, subject to the contract or order, the work area handover procedure may precede the issuance of the work permit (the issuer of the work permit must be determined in the SHPP prior to construction).

The handover of the work area must be documented in writing, and the document must cover the most important regulations regarding the work area, the special hazards present in the work area, and other issues and problems not otherwise regulated, which may endanger the safety of the construction activity.

The Contractor or person responsible for coordination must be specifically named in the handover documentation of the work area, if the construction is not subject to an SHPP or is not named in the SHPP.

After taking over the work area, the Contractor (taking over the work area) must surround it in a clearly visible manner (taking into consideration local circumstances). At the border of the fenced-off area, warning, prohibition and information signs must be installed about the work being performed. The



information label must indicate the name and address of the company/companies performing the work, as well as the name and contact details of the on-site work manager.

If, for any reason, it is not possible or justified to fence off the work area (e.g. when mowing lawn, taking care of plants, checking sprinklers or other fire protection devices, etc.), the Contractor must indicate the fact that work is being performed, the name of the Contractor, as well as the name and contact details of the supervisor by installing a sign on the access route to the work area.

In a work area where it is justified by the nature of the hazard, safety and health protection signs must be installed in order to protect employees and those within the scope of the work.

The installation of these signs is the responsibility of the Contractor working in the area. Warning and prohibition signs must draw the attention of those performing the work and those within the scope of the work to the hazards arising in the work location.

After taking over the work area, the Contractor is responsible to ensure the protection of persons within the scope of the work according to the laws in force at all times (currently, the provisions of Act XCIII of 1993 (OHS Act) are applicable).

3 Documents required to be kept at the work site

At the sites/in the projects of ALTEO Nyrt., work may only be performed in possession of documents proving suitability, education, qualification and authorization for the performance of the given activity:

- · an occupational health report proving fitness for work,
- · document proving authorization to work as a supervisor, training records
- fire protection examination (for the professions and activities prescribed by law),
- work area handover and provision records (where necessary),
- risk assessment or SHPP (where necessary according to the internal regulations of ALTEO Nyrt.),
- list of work equipment and instruments, periodic inspection records,
- · safety data sheets of the chemicals used,
- periodic inspection records of lifting devices, slinging devices and machines,
- employer's assignments and training records of first aiders,
- documents proving qualifications (lifting equipment operator, welder, other machine operator, etc.)
- work permit.

The specified documents may be stored and presented on site in electronic form.

4 Supervisor

The Contractor(s) must appoint a supervisor to control the work on site. The supervisor can only be a person who, in addition to the general employment conditions:

- is suitable for controlling several people,
- knows the hazards and sources of hazards typical of the given work environment,
- knows the health, safety and environmental regulations required for the performance of the work and is able to apply them in practice,
- has participated in the supervisor training prescribed by ALTEO Nyrt. and passed the relevant exam.

The supervisor

- must ensure safe and non-hazardous working conditions on site for those performing work under his or her control, as well as ensure compliance with and check the safety regulations defined in the applicable laws;
- must clearly distinguish himself or herself from those performing work under his or her control (colored armband, safety helmet with a different color, etc.);
- must suspend the work and report this fact to the operator's representative if he or she detects any abnormal circumstances during the work;



- may leave the work site only after the suspension of work; while he or she is absent, the employees under his or her control must not perform any work;
- may only perform work if he or she can safely monitor those performing work under his or her control, as well as the movements and incidents that pose a threat, and if he or she can take timely action and respond to any hazards that may arise;
- in the case of work in confined spaces, in addition to control tasks, he or she can only perform observation activities;
- must inform those performing work under his or her control about the risks of the work and the HSE regulations to be followed in a documented manner.

5 Organizational requirements

5.1 Provision of sanitary facilities

During its work performed at the sites or facilities of ALTEO Nyrt., the Contractor must ensure the minimum level of occupational health and safety requirements in the workplaces according to the laws in force at all times (currently Joint Decree No. 3/2002 (II. 8.) SzCsM-EüM is applicable in this respect).

If the work site qualifies as a construction workplace, the provisions of the laws in force at all times, currently "Joint Decree No. 4/2002 (II. 20.) SzCsM-EüM on the minimum occupational health and safety requirements to be implemented at construction workplaces and during construction processes", must also be complied with.

The Contractor must provide drinking water or hot drink/soda water depending on the nature of the work and the current weather conditions, as well as protective agents and an adequate level of cleaning and hygiene conditions in line with the nature of the activity and work.

In the event of work carried out in a technological area or outdoors, if the work is expected to last longer than 2 days and the expected number of persons working simultaneously is at least 10 (including the aggregate number of the employees of the Contractor and its Subcontractors), a resting place (container) and at least 1 mobile toilet must be provided by the Contractor concerned in the work area. This quantity must be increased by 1 more mobile toilet for each additional 5 persons.

If the work lasts longer than two weeks, a washroom must also be provided. This requirement does not have to be complied with if, after the work has been completed, the employer transports the employees to a central location where adequate sanitary facilities are present.

In the washroom, a wall-mounted wash basin must be provided per 5 employees, as well as 1 shower with cold and hot running water per 20 employees. There must be proper ventilation, illumination and heating in the washroom. The temperature to be ensured is 21 °C. Separate showers must be provided or the separate use of showers must be made possible for women and men.

The resting container must be provided with a heating system (in winter, if the daily average temperature is less than +4 degrees) and a cooling system (in summer, if the daily average temperature exceeds +24 degrees), and must be of a suitable size.

The containers provided by the Contractor are to be installed based on the approved organizational plan; if there is no such plan, the installation can take place upon consultation with ALTEO Nyrt.

Any deviation from these instructions is only allowed if the contract for the activity includes provisions contrary to these conditions. The contract may not be contrary to the applicable legislation.

5.2 First aid requirements

The employer (Contractor) must ensure the possibility of providing first aid, and also that one of the employees should be a person trained and qualified according to the relevant regulations, appointed for



the provision of first aid, who is always available on site (the document proving such qualifications must be presented upon request).

Measures must be taken to ensure that workers who have suffered an accident or suddenly become ill can be transported for medical care at any time.

In the event of maintenance or project activities requiring a significant number of personnel, if the size of the workplace or the nature of the activity makes it necessary, one or, where required, even several first aid rooms must be established. The obligation to establish first aid rooms exists if more than 50 employees work at the construction workplace simultaneously. This room must be labeled as specified in the relevant specific laws in force at all times (currently, Decree No. 2/1998 (I. 16.) MüM is applicable in this respect). This room must be dimensioned in a way that a stretcher can be easily brought in there, with the injured person lying on it.



First aid rooms must be equipped with the appropriate first aid equipment and devices.

In addition, first aid equipment must be available at all places where this is required by the working conditions.

The storage locations of first aid equipment must be labeled in accordance with separate legislation, and they must be easily accessible.

The address and phone number of the nearest ambulance service must be displayed in a clearly visible place.

6 Causing and reporting HSE incidents

The Contractor must report any incident that involves:

- personal injury,
- the formation of fire or smoke,
- a technical incident involving material damage or equipment malfunction,
- environmental pollution,
- a traffic accident,

or is related to such circumstances.

The report must be made to the manager of the technological area where the work is performed (Operator) and to the Customer (the person appointed in the contract as the Customer's representative) with respect to incidents affecting the Contractor's own employees and any subcontractors' employees.

The verbal notification must be confirmed in writing within 24 hours, providing the following information:

- date and time of the incident;
- location of the incident (company/identifiable location);
- nature of incident (actual incident/near miss);
- type of incident (process accident or personal injury, material damage, road accident, occupational disease, spillage into the environment, fire/explosion, road incident);
- whether it is related to the performance of work:
- affected persons (own employee, supplier/subcontractor, third party);
- brief description of the incident;
- data of reporting person.

To support the subsequent investigation of the incident, after reporting the incident, if possible, the location must be left unchanged until the arrival of the plant staff. The Contractor must order the



immediate exploration of the root causes of the incident and document them according to the applicable legislation, and, in case of a personal injury subject to reporting, a report must also be made to the authorities. The Contractor must involve the appointed representative of ALTEO Nyrt. in the investigation of the incident through consultation and provide a copy of the investigation records to him or her.

7 Emergency procedures

The Contractor must familiarize itself with the alarm rules of the work site, the method of alarming, assembly points, emergency phone numbers, and the expected rules of conduct.

The Supervisors will be informed of these rules by the issuer of the work permit.

8 Rules and procedures for sanctions for the breach of regulations

Contractors working for ALTEO Nyrt. and their employees (agents), as well as the Subcontractors used, are responsible for compliance with the provisions of these regulations, as well as the occupational health and safety, fire protection and environmental protection requirements set forth in the relevant laws

During the performance of the work by the Contractor, the specified representatives of ALTEO Nyrt. are entitled to conduct on-site inspections to check the compliance of the work with the rules. The inspections cover the checking of compliance with the applicable and relevant legal regulations and the HSE requirements of ALTEO Nyrt.

Depending on the severity of violations found and documented during the on-site inspections, ALTEO Nyrt. is entitled to apply occupational health and safety sanctions.

Depending on the severity of violations found and documented during the on-site inspections, ALTEO Nyrt. is entitled to apply the following sanctions:

- · Notice for resolving discrepancies
- Ordering extraordinary occupational health and safety and fire protection training
- Withdrawal of work permit, temporary suspension of work
- Application of HSE penalty (fine) as defined in Annex 1
- Expulsion of the employees of the Contractor and its Subcontractors from the sites of ALTEO Nyrt. according to Annex 1
- Termination of the Contract with immediate effect

By signing the works contract, the Contractor declares that if it violates the provisions of these regulations, the legal consequences described in the regulations may be applied against it and considers them to be lawful and proportionate.

The Contractor accepts that any delay due to occupational health and safety, fire protection or environmental protection sanctions does not provide a legal basis for amending the delivery deadline specified in the Contract.

8.1 The process of sanctioning

If the relevant regulations or laws are violated by the Contractor, its employees or its Subcontractor for the first time, the Customer will warn the Contractor in writing.

If the Contractor, its employees or its Subcontractor repeatedly violate the regulations or laws, depending on the nature of the violation, the Customer may, at its discretion, apply the sanctions referred to in Annex 1 against the Contractor (penalty, other legal consequences).

In case of a serious violation, instead of a written warning, the Customer is entitled to apply the sanction referred to in Annex 1 immediately.

A violation is considered to be serious if the consequence thereof may be **serious damage** to the life, physical integrity or health of the employee(s) or the person(s) within the scope of the work.



If multiple contracts exist between the Contractor and the Customer (irrespective of the place of performance), the violations are counted on an aggregate basis, rather than separately for each contract.

Sanctioning procedure:

The persons authorized to conduct the inspection record the violation detected during the inspection in a protocol. This protocol is signed by the employee who violated the regulations or by a representative of his or her employer, who are entitled to acknowledge or object to the violation.

The person conducting the inspection sends the protocol, supplemented with a sanction proposal, to the Sustainability and HSE Director, who decides at his or her own discretion on the application of the sanction and the amount of the fine (HSE penalty) to be imposed, and informs the Contractor and the Customer in writing. If the sanction is an expulsion, the Ethics, Compliance and Control Director of ALTEO Nyrt. must also be informed of the decision made. The Contractor must pay the penalty by the deadline stated in the penalty notice from ALTEO Nyrt. If the Contractor does not pay the penalty within the specified deadline, the amount of the penalty may be deducted from any remuneration of the Contractor.

The Contractor accepts that the payment of the fine (HSE penalty) imposed is a precondition for the payment of the contractor's fee specified in the Contract.

Persons entitled to conduct inspections and to propose sanctions:

- In the case of construction works subject to an SHPP, the persons specified in the SHPP.
- In the case of construction, repair or maintenance works not subject to an SHPP, the persons specified in the Contract.
- In the case of construction, repair, maintenance, etc. works subject to a construction log (e-log or paper-based log), the persons specified in the construction log.
- In all other cases:
 - o employees of the Sustainability and HSE Directorate of ALTEO Nyrt.,
 - o appointed representatives of the Customer,
 - o manager or representative of the project location (site)



9 Annexes

Annex 1 Sanctions for breaches

Sanctions for breaches (penalties, other legal consequences)										
No.	Violation	Amount of penalty	Other sanction							
1	Violation of smoking regulations	HUE 100 000	expulsion: 3 years (person)							
١.	Violation of fire ban	HOF 100,000	expulsion. 5 years (person)							
2.	Working without a work permit	HUF 100,000	suspension of work							
3.	Consumption, storage or possession of alcohol or narcotics at the sites of ALTEO Nyrt., or an attempt of the same	HUF 70,000	expulsion: 3 years (person)							
4.	Working in an improper condition for work	HUF 70,000	expulsion: 3 years (person)							
5.	Providing or using inappropriate protective equipment, failure to use protective equipment	HUF 30,000	occasion per person							
6.	Using a prohibited area for traffic or stay	HUF 30,000	occasion per person							
7.	Traffic offense	HUF 30,000								
8.	Failure to disconnect the work area from the mains after work	HUF 30,000								
9.	Acts against property, theft, intentional damage, etc.	HUF 100,000	compensation for damage, permanent expulsion							
10.	Careless soiling of roads, causing damage to areas, soil pollution during transport	HUF 30,000	removal of damage, cleaning							
11.	Improper indication of work area,	HUF 30,000								
12.	Improper storage of the waste generated	HUF 30,000								
13.	Lack or non-conformity of medical fitness document	HUF 30,000 per person	suspension of the person's work							
14.	Lack of documents required to be kept on site	HUF 30,000 per document								
15.	Failure to meet reporting obligation	HUF 30,000								
16.	Worker poses a serious risk to his or her or another person's bodily integrity or well-being	HUF 30,000	expulsion: 6 months (person)							
16.	Working without HSE training	HUF 30,000 per person								
17.	Lack of company identification	HUF 30,000 per person								
18.	Failure to provide amenities (toilet, resting and dining container, etc.) deadline: start of work	HUF 50,000								
19.	Non-compliance with regulations not specifically examined here	HUF 30,000								



Annex 2: Simplified risk assessment, sample document

		HSE PLAN]
D	escription of the works		
Α	greement ID		
	Principal		General Contractor
1	General Contractor		General Contractor
	Contractor 1		General Contractor
٦	Contractor 2		General Contractor
2	Contractor 3		General Contractor
	Add more as applicable		General Contractor
3	Brief description of the activities/tasks to be performed		General Contractor
4	Site, location		General Contractor
_	The HSE plan was drafted by	name of author	General Contractor
5	Date of drafting	day. month. year	General Contractor
	The HSE plan was approved by (on behalf of the site)	name of approver	Organizational unit/site representative
6	Date	day. month. year	Organizational unit/site representative
7	The HSE plan was approved by (on behalf of the General Contractor)	name of approver	General Contractor
	Date	day. month. year	General Contractor
8	The HSE plan was approved by (on behalf of HSE)	name of approver	Organizational unit/site HSE
	Date	day. month. year	Organizational unit/site HSE
		SUBCONTRACTOR'S MANAGEMENT	
		Description	
be Si	escription of requirements to e complied with by the ubcontractor and its ubcontractors (sub-ubcontractors)	Control over the subcontractors involved in the construction is described in the contract.	Subcontractor
Di be su sa	ivision of HSE liability etween several ubcontractors working at the ame location at the same time varallel work)		Subcontractor



SUPERVISION											
	Title	Frequency									
Supervision: General Contractor	XY – HSE XY Building Engineer/Supervisor	Through weekly spot checks.	General Contractor								
Supervision: Subcontractor	N/A	N/A	Subcontractor								
Supervision: locals	XY Kft.	Through spot checks	Site								
Supervision: indicate whether necessary			Other								

	TECHNOLOGY (SITE) HAZARDS																			
	Physical hazard																			
Fill in the technology	Lifting/rotating/hauling of equipment	Disruption of structural balance	Slipping, stumbling, falling; moving objects	Sharp, burred edges	Temperature, hot material	Workspace not level with the ground	Work above, falling objects	Inclement weather	Pressure and vacuum	Energy source with no control device (oven, reactor, column)	Insufficient ventilation	Closed space	Noise	Vibration	Insufficient lighting, laser	Electromagnetic field	High voltage	Location and arrangement (domino effect)	Dusty environment	Other (specify)
Architectural demolition	X	X	X	X		X	X	Х					X	Х						
Concreting, formwork	X	X	X	X		X	X	х						X						
Erecting structures	Х	X	Х	X		Х	Х	Х												
Master builder's work	X	X	X	X		Х	Х	Х					X							
Production of steel structures	X	X	X	X		X	Х	Х					X							
Repair of outer facades	X	X	Х	X		X	Х	Х					Х							
Repair of inner facades	Х	Х	Х	X		Х	Х	х					Х							

		Presence of hazardous substances																
Fill in the technology	Fire and explosion hazard	Hazardous atmosphere	Risk of fire (highly flammable)	Ionizing radiation sources	Toxic	Caustic	Irritating	Causing sensitivity or allergic reactions	Infectious	Carcinogenic	Mutagenic	Teratogenic	Fetotoxicity/embryotoxicity	Inert gas asphyxiation (nitrogen, carbon dioxide)	Microorganisms	Other (specify)		
Architectural demolition																		
Concreting, formwork																		



Erecting structures										
Master builder's work										
Production of steel structures										
Repair of outer facades										
Repair of inner facades										

Other important information: (e.g. specification or description of the above hazards or other hazards from specific technology, layout, design, etc.)

Work involving a risk of fire.

				Job Safety Analysis (JSA) and SOP							
						Parti	cipant ·	– Lia	bility	,	
Step number	Step/Activity	What can go wrong?	What can be damaged/who can get injured?	Mitigation / Preventive action	Issuer of order	Operator	General Contractor	Subcontractor	Local fire	Other (specify)	Related legal or internal documentation currently in force
1.	Occupation of the work area	mechanical hazards, risk of falling down, falling in, tripping, risk of electric current, manual and mechanical material handling.	Employees, experts, helpers	Personnel conditions: Qualification, training. Material conditions: Tools in perfect condition Personal protective equipment: Safety helmet, safety shoes, safety gloves, protective goggles,	S		М, Е, А				Decree No. 4/2002 SzCsM- EüM (establishment of construction workplaces), Decree No. 65/1999 (XII. 22.) EüM, Act XCIII of 1993 (OHS Act), Decree No. 10/2016 (04. 05.) NGM (work equipment)
4.	Concrete chiseling, demolition	mechanical hazards, risk of falling down, falling in, Surfaces with sharp burrs, work at height, work involving a risk of fire Manual and mechanical material handling Debris flying out.	Skilled construction worker, unskilled worker.	Personnel conditions: Qualification, training, Material conditions: Tools in perfect condition Certified fire-fighting equipment. Personal protective equipment: Safety helmet, safety shoes, safety gloves, cut-proof protective gloves, mechanical protection of electrical cables. Collective protection: three-row 1 meter high regular guardrail, fall protection harness, properly sized covers.	S		М, Е, А				Decree No. 4/2002 SzCsM- EüM (establishment of construction workplaces), Decree No. 65/1999 (XII. 22.) EüM, Act XCIII of 1993 (OHS Act), Decree No. 10/2016 (04. 05.) NGM (work equipment)



	Formwork with prefabricated board-based formwork systecustom wooder formwork, installation, cut and bending of reinforcement steel, on-site installation of reinforced concrete, ready mixed concrete pumping, need vibrator compaction per layer,	mechanical hazards, risk of falling down, falling in, tripping, risk of electric current, manual and mechanical material handling. Surfaces with sharp burrs, work at height. Work involving a risk of fire.	Skilled construction worker, unskilled worker.	Personnel conditions: Qualification, training, Material conditions: Tools in perfect condition Certified fire-fighting equipment. Personal protective equipment: Safety helmet, safety shoes, safety gloves, cut-proof protective gloves, protective goggle, protective clothing, fall protection harness, collective protection: three-row 1 meter high regular guardrail, properly sized covers, mechanical protection of electrical cables.	S	M, E, A		Decree No. 4/2002 SzCsM- EüM (establishment of construction workplaces) Decree No. 65/1999 (XII. 22.) EüM, Act XCIII of 1993 (OHS Act), Decree No. 10/2016 (04. 05.) NGM
	Mechanical concrete demolition, on demolition was With Bobcat on floor structure.	Mechanical hazards, risk of falling down, falling in, tripping, risk of electric e. current. Manual and mechanical material handling.	Skilled construction worker, unskilled worker.	Personnel conditions: Qualification, training. Material conditions: Tools in perfect condition. Earth-moving machine in perfect condition. The demolition of the floor structure can start from the firm underground. Demolished concrete debris should be used to build an underground in front. Level and compact the underground. The floor structure may only be demolished in a way that the horizontal distance between the plane of the structure to be demolished and the plane of the underground being built may not be more than 50 cm.	S	M,E,A		Decree No. 4/2002 SzCsM- EüM (establishment of construction workplaces), Decree No. 65/1999 (XII. 22.) EüM, Act XCIII of 1993 (OHS Act), Decree No. 10/2016 (04. 05.) NGM
	Preparation of base plate for tupstream inlet of Turbine I.	ne tripping. Surfaces with sharp	Skilled construction worker, unskilled worker.	Personnel conditions: Qualification, training, Material conditions: Tools in perfect condition Certified fire-fighting equipment. Personal protective equipment: Safety helmet, safety shoes, safety gloves, cut-proof protective gloves, mechanical protection of electrical cables. Collective protection: three-row 1 meter high regular guardrail, fall protection harness, properly sized covers.	S	M,E,A		Decree No. 4/2002 SzCsM- EüM (establishment of construction workplaces), Decree No. 65/1999 (XII. 22.) EüM, Act XCIII of 1993 (OHS Act), Decree No. 10/2016 (04. 05.) NGM
1	Transformer space, electrica rooms, master builder's work.	Mechanical hazards. Risk of falling down, falling in, I tripping. Surfaces with sharp burrs, manual and mechanical material handling. Work at height.	Skilled construction worker, unskilled worker.	Personnel conditions: Qualification, training, Material conditions: Tools in perfect condition Certified fire-fighting equipment. Personal protective equipment: Safety helmet, safety shoes, safety gloves, cut-proof protective gloves, mechanical protection of electrical cables. Collective protection: three-row 1 meter high regular guardrail, fall protection harness, properly sized covers.	S	M,E,A		Decree No. 4/2002 SzCsM- EüM (establishment of construction workplaces), Decree No. 65/1999 (XII. 22.) EüM, Act XCIII of 1993 (OHS Act), Decree No. 10/2016 (04. 05.) NGM



Mechanical hazards. Risk of Personnel conditions: Qualification, training, Plastering, repair falling down, falling in, Decree No. 4/2002 SzCsM-Material conditions: Tools in perfect condition. Certified fire extinguisher. Personal protective tripping. Surfaces with sharp EüM, Decree No. 65/1999 and painting of Skilled construction (XII. 22.) EüM, Act XCIII of 1993 (OHS Act), Decree No. 13. inner facades on M,E,Aburrs, manual and worker, unskilled S equipment: Safety helmet, safety shoes, safety historic mechanical material worker. gloves, fall protection harness, 3-row regular 10/2016 NGM. handling. Work at height. monuments. guardrail. Chemicals and paints.

	Emergency actions			Manda	tory personal protective equip	ment
	Description	To protect:	Yes	No	Туре	EN (number of standard)
Requirements for suspending	, , ,	Head	Х		safety helmet	MSZ EN 397
work (e.g. weather, works	from the Building Engineer.	Hearing	Х		earplugs or earmuffs	MSZ EN 352-1, MSZ EN 352-2
performed in an area close by)		Eyes / face, head	Х		protective goggle, safety helmet	MSZ EN 166
		Airways		Х		
First aid provided by and kit stored in	Provided by the general contractor, placed in the work area.	Arms/hands	X		Five-finger protective gloves	MSZ EN 388
First aid provided at	Persons included in the list of first aiders in the occupational health and safety folder placed in the work area.	Legs/feet	Х		Safety shoes with steel toe	MSZ EN 20345
Escape routes from location	Specified by SHPP.	Skin		X		
In case of emergency communication between the subcontractor and locals provided by (title)	XY Building Engineer	Upper body/torso		Х		
How to warn about an emergency on site?	Loud words, mobile phone	Body	X		Working clothes	EN ISO 11612, EN 1149-5
Emergency action in the event of fire/explosion	Stop work, notification of fire brigade, plant, employer, Central Hotline (0-24 hours), assembly at the designated assembly point.	Bathroom provided	by:		XY Kft.	
Emergency action in the event of injury	Stop work, notification of ambulance, plant, employer Make arrangements for medical care, report to the direct workplace manager, the Contact Person and the HSE organization (persons listed on page 1)	Warming room prov	ided by	(in temp	eratures below zero):	XY Kft.
Emergency action in the event of spills		Subject to weather	conditio	ns, hot d	rink/soda water provided by:	XY Kft.



Annex 3: Load lifting

Work process

- When applying for a work permit, the Contractor indicates that the work necessitates the use of cranes.
- 2. It checks (with the help of the customer's agent, if requested) whether it is necessary to prepare a lifting plan for the performance of the lifting operation. If the lifting operation is considered risky, the operator of the lifting equipment used must prepare a lifting plan. See the details broken down by site in Sections 2.1 and 2.2 of Annex 3.

If the lifting operation requires a plan, the Contractor hands over a copy of the lifting plan prepared in accordance with the regulations to the customer ordering the work for approval at least 72 hours before the lifting activity (installation). In all cases, the authorized lifting specialist of ALTEO Nyrt. is entitled to evaluate the plan and issue a preliminary approval.

The Contractor provides the crane necessary for the work (if lifting operations are within the technical scope of the Contractor), checks the technical condition of the ordered machine and its accessories, the operator's license, and

- It checks whether the load capacity of the ordered machine is appropriate for the weight of the load to be lifted.
- It checks the validity and existence of the following documents:
 - o a certificate of conformity for occupational health and safety,
 - o commissioning permit
 - o instruction manual in Hungarian language
 - o load diagram
 - o lifting equipment log (regularly maintained)
 - o crane log (regularly maintained)
 - o records certifying the occurrence of periodic reviews
 - valid registration certificate
 - o documents certifying the qualification of slingers
- It checks compliance with the personnel conditions for crane operations:

A crane may be operated independently on site by a person who:

- o is more than 18 years old
- o is fit for work according to the preliminary and periodical Fit to Work Medical examination
- has the required qualifications
- has received occupational health and safety training regarding the specificities of the location.
- It checks whether the conditions necessary for the safe stabilization of the crane are ensured at the site of the crane operation, whether there are public utility or other lines under the ground surface that may be damaged through the crane operation (the inspection is supported by a competent manager of ALTEO Nyrt.)
- 2.1 A lifting operation is considered risky (TVK Power Plant, BC Power Plant and BC Power) if:
 - work is performed in an area where arrangements must be made for the safe operation of lifting machines operating within each other's reach,
 - lifting is done with more than one crane,
 - the weight of the load to be lifted exceeds 80% of the rated load range of the lifting equipment (load range for extension of boom),
 - the weight of the load to be lifted exceeds 70% of the rated load range of the lifting equipment (load range for extension of boom), and any malfunction may endanger existing facilities,
 - a lifting beam or pillar is used for a lifting operation,
 - the load weighs more than 15 tonnes and is lifted over facilities out of operation,
 - the load weighs more than 3 tonnes and is lifted above or close to existing facilities in operation,



- people work in the immediate vicinity of or under a suspended load of more than 3,000 kg or installation activities (attachment, welding) must be carried out under it,
- lifting activities are carried out near high or low voltage above-ground electrical power lines,
- this is requested by the head of the plant incorporating the work area due to the technological processes taking place in the area,
- 2.2 A lifting operation is considered risky (apart from Section 2.1 at all other sites, as well as for brownfield or greenfield work) if:
 - work is performed in an area where arrangements must be made for the safe operation of lifting machines operating within each other's reach,
 - lifting is done with more than one crane,
 - the weight of the load to be lifted exceeds 90% of the rated load range of the lifting equipment (load range for extension of boom),
 - the weight of the load to be lifted exceeds 75% of the rated load range of the lifting equipment (load range for extension of boom), and any malfunction may endanger existing facilities,
 - the load weighs more than 20 tonnes and is lifted over facilities out of operation,
 - the load weighs more than 3 tonnes and is lifted above or close to existing facilities in operation,
 - people work in the immediate vicinity of or under a suspended load of more than 3,000 kg or installation activities (attachment, welding) must be carried out under it,
 - lifting activities are carried out near high or low voltage above-ground electrical power lines,
 - this is requested by the head of the plant incorporating the work area due to the technological processes taking place in the area,
- 3. Documentation and technical checks are performed, and confirmed in writing, by the Contractor ordering the lifting operation.
- 4. The Contractor informs the issuer of the work permit of the receipt of the lifting machine, fills in, presents and hands over the completed *Crane inspection and permission sheet*, and, after reviewing and countersigning the sheet, a competent person (who has issued the work permit) authorizes the commencement of the operation.

When issuing the permit, the issuer of the permit will not check the correctness of the completed form, but is entitled to perform spot checks at any time during the work. If any deficiency or non-compliance is revealed, the lifting activity must be suspended immediately.

The issuer of the permit will attach a copy to the work permit, while the original must be kept by the person performing the lifting operation during the work process.

5. The Contractor reports the completion of the lifting operation to the approver. The fact that the lifting activity has been completed must be recorded on both copies of the *Crane inspection and permission sheet*, and then the machine may leave the site.

For lifting operations not requiring a plan, the process is identical with the one described above.



(alteo CRANE INSPECTION	N AND PERMISSION SHEET Date:		
Entity ordering the crane (company, name):	Name of company performing the crane operations		
Company performing work related to crane operations:	Vehicle driver, crane operator:		
Entity approving the crane operations:	Contributors to crane operations (contractors, insu	rers):	
Name of checke	ed document	Yes	No
Certificate of conformity for occupational health and safety, com	missioning permit		
Instruction manual in Hungarian language			
Load diagram			
Lifting equipment log (regularly maintained)			
Crane log (regularly maintained)			
Records certifying the occurrence of periodic reviews (with a "pa	assed" result)		
Valid registration certificate			
Certificates proving the qualification of persons involved in the cr	rane operations (lifting equipment operator, slinger)		
Documents proving the medical fitness of persons involved in the	e crane operations		
Document proving the completion of the occupational health and	safety training regarding the specificities of the location		
Lifting o	data	Yes	No
The load to be lifted exceeds 65% of the load capacity associate	ed with the boom extension of the lifting equipment		
The load to be lifted exceeds 50% of the load capacity associate	ed with the boom extension of the lifting equipment		
Malfunction of the equipment may endanger existing facilities			
The load to be lifted weighs more than 15 tonnes			
The load to be lifted weighs more than 1 tonne, and the lifting op	peration takes place above an existing facility		
The load to be lifted weighs more than 1 tonne, and people are v	working under or in the immediate vicinity of the load		
The lifting activity takes place in the vicinity of an overhead elect	ric line		
A lifting plan is required according to the preliminary examinatior	1		
There is an approved lifting plan according to the regulations			
The lifting area must be, and has been, fenced off			
Security personnel must be appointed for the lifting area, and the	ey are available		
I hereby grant permission for the start of the crane			
Name/signature	Date and time:		
We have completed the crane operation:			
Name/signature of person making the report	Date and time:		
I acknowledge the completion of the work; there was no incident	t subject to reporting during the work.		
Signature			



Annex 4: Rules for work involving a risk of fire

PERFORMING HOT WORK

Subject: Principles, definitions and regulations related to activities involving a risk of fire This annex is in line with the effective laws and regulations currently in force in Hungary, as well as with the internal rules; it is an explanatory and informative description thereof.

Definitions, general provisions:

- <u>Activity involving a risk of fire:</u> an activity performed at temperatures exceeding the ignition temperature or flash point of any surrounding combustible material or done with an open flame or with glowing, smoldering or sparking that can serve as an ignition source.
- Brownfield work: see Section 1.1 Definitions
- Greenfield work: See Section 1.1 Definitions
- <u>HSE critical activity:</u> work representing a significant risk in itself or performed under special conditions.

Conditions for permitting activities involving a risk of fire

Personnel conditions for authorizing and starting hot work:

- a hot work permit may only be issued by a person with a "Fire protection examination (1)"
- hot work may not be performed alone
- from those performing hot work, at least the employee supervising the work must have a "Fire protection examination (1)"
- welders and other persons performing work with an open flame must have a fire protection examination valid for the given area to perform the activity. Other activities involving a risk of fire can also be performed by a person who has received training in fire protection rules and regulations.
- work that requires a certain qualification according to the applicable legislation can only be performed by employees with the required qualification
- activities involving a risk of fire can only be performed by a person who is at least 18 years of age and is mentally and physically fit to perform the work

Further conditions for starting hot work:

- after issuing the necessary permits, those performing the hot work take over the work area from the issuer of the work permit within the framework of the work area handover procedure
- before performing the work, it must be ensured that the work area and its surroundings are in a
 condition ensuring that the activity involving a risk of fire can be performed safely, and that other
 equipment cannot be damaged during the performance of the activity.
- before starting the activity involving a risk of fire, it must be confirmed that the work is not impeded by the technology, and this fact must be recorded in the written permit
- Combustible materials must be removed from the 5-meter area of the work involving a risk of fire, or, if that is not possible:
 - o to provide protection against heat radiation, the combustible material must be separated and covered with a non-combustible material with good thermal insulation.
 - when glowing materials are scattered, combustible materials may e.g. be covered with a wet tarpaulin, the endangered area may be wetted with water, etc.

Other safety regulations, obligations:

- Those performing the inspection (issuer or countersigner of the permit) and the work must comply with the working conditions prescribed in the issued permit and regularly monitor the work and the conditions thereof. <u>If there is any change in the specified conditions, the work must be stopped</u>, the necessary modifications in the requirements of the permit must be initiated, and a modified permit must be issued.
- The person giving direct instructions for the work or directly controlling the activity of persons performing the work must:
 - o provide supervision from the beginning to the end of the work
 - provide fire-fighting equipment and fire extinguishers suitable for extinguishing fires that may arise there



- After completing the activity involving a risk of fire, the persons performing the work must:
 - inspect the site and its surroundings from a fire protection point of view
 - o eliminate all circumstances that may lead to a fire
- After completing the activity involving a risk of fire, the <u>person directly controlling the activity</u> of those performing the work must:
 - hand over the worksite to the manager of the facility at which the work is performed or the authorized representative thereof
 - the date and time of handover must be indicated in the permit and must be confirmed by signature.
- On the premises of TVK-Erőmű Kft., depending on the nature of the work involving a risk of fire, FER Kft. must be present, subject to consultation with the technical manager.

Permitting activities involving a risk of fire

On the premises of the ALTEO Group, activities involving an occasional risk of fire may only be performed with a written permission, irrespective of the person performing the work.

Pursuant to § 11 of the National Fire Protection Regulations, a written permit authorizing work involving a risk of fire may be issued by the employer of the person performing the work or a person authorized by the employer.

The written permission consists of two parts, a "work permit" and an attached form entitled "hot work permit".

The work permit is issued by an authorized employee of the given site, while the hot work permit is issued by the person ordering the work (representative of the employer of the person performing the work), and, if the required conditions are met, it is countersigned by an authorized employee of the given site.

If the two documents are not issued at the same time, the document authorizing hot work must be subsequently attached to the relevant work permit.

Documentation:

Basic documents for performing work:

- work order
- work permit
- hot work permit

Content requirements:

The form authorizing hot work must, at a minimum, contain the following:

- name of the issuer of the permit, number and validity of his or her fire protection examination certificate
- list of those performing the work, name of supervisor, number and validity of fire protection examination certificates
- for work subject to qualification, name of person performing the work and number of certificate certifying his or her qualification
- work site, planned date of work
- brief description of the activity
- other regulations related to the performance of the activity (humidification of environment, covering of nearby equipment, the need to measure gas concentration, etc.), the relevant fire protection rules and regulations
- type and number of fire extinguishers to be kept on site

The Contractor may order hot work carried out in a non-technological facility in a commercially available form complying with the provisions of the fire protection law in force (currently the Fire Protection Regulations according to Decree No. 54/2014 (XII. 5) BM).

Validity:

 A hot work permit may be issued for a maximum period of a single shift. A copy of it must be kept at the work site. After the work has been completed, the permit must be countersigned and retained for two years.



Form:



PERMIT For performing hot work (for a single occasion, one day)

Number (date/no.) 20....--/.....

According to the National Fire Protection Regulation and the on-site survey conducted on (day) (month) 20 (year), the following hot work may be performed:
Exact location for performing the hot work:
Time and duration of performing the hot work: from (day) (month) 20 (year), (hours) (minutes) to day month year 20, (hours) (minutes) Extended:
Details of the person performing the hot work: Name:
Number of fire protection examination certificate:
Name: Number of fire protection examination certificate:
In addition to the Decrees, the welding safety regulations, and the provisions of the relevant standard, the person performing the work must comply with or execute the following regulations:
 Before starting the activity, all flammable (combustible, etc.) materials must be removed from the 5 m area thereof, or, if that is not possible, they must be covered with a wet tarpaulin or other material not transferring heat. It is prohibited to perform work in any place where it may cause fire or explosion until the risk of fire or explosion has been eliminated. It is prohibited to use defective, damaged, leaking or unregistered appliances, leaking bottles, cracked or damaged hoses or equipment. It is only allowed to carry out welding operations with equipment in a perfect and reliable condition. Equipment in operation must not be left unattended. Bottles must be kept away from heating elements, pipelines, grounding elements, and the place of flame cutting or welding operations. Before starting the activity, the floor openings must be covered, and the lower level must be checked for any conditions leading to a risk of fire. The site and lower levels must be inspected upon completion of the activity. While performing the activity, fire extinguishers and fire-fighting equipment suitable for extinguishing the given fire must be at hand. The permit does not entitle its holder to enter any equipment or smoke.

Signature of the person issuing the permit





For activities involving a risk of fire to be carried out by a local manager of the function ordering the work, or his or instruction:	
I entrusted the following employee with the provision of s the activity:	upervisory services during the performance of
Name:	
Position:	
and I have instructed him/her with respect to the relevant I hereby authorize the performance of the work involving protection regulations and additional measures described	a risk of fire subject to compliance with the fire
S	ignature of the manager of the workplace
I have received the fire protection training necessary for a manifold from the fire exting made available to me. I assume criminal responsibility health and safety regulations regarding the activity, and I	guishers, fire-fighting equipment and devices or compliance with the fire and occupational
	(day) (month) 20 (year)
Si	gnature of the person performing the work
The work has been completed, everybody has left the we there are no fire hazards in the work area, the work area	ork area, tools, materials and waste removed, is in a safe state
Handed over on: Date/time: /	······:: ········:
Received on: Date/time: / 20 :	
Signature of the person issuing the permit	Signature of the manager of the workplace

Information:

- a) The welder must have the welding permit at hand during the work.
- b) The permit must be issued in 2 copies, one copy is kept by the issuer.
- c) Work involving a risk of fire may only be performed in compliance with the provisions of the permit.
- d) In the event of an official inspection, the permit must be presented.
- g) The welding equipment must be recorded in a register, based on which the given appliance can be identified (plant number, serial number, name of the operator, etc.).
- **h)** Welding operations may only be performed by a person with a valid professional and fire protection certification.
- i) Hot work may only be performed by a minimum of 2 people; it is PROHIBITED to entrust 1 person with this type of activity.
- **j)** For other activities involving a risk of fire (e.g. soldering, bitumen heating, use of a blow lamp, burning weeds and dry leaves, etc.), the individual sections of the permit must be filled in as appropriate to the nature of the activity.



Annex 5: Working in confined spaces

Regulations for work in confined spaces:

At the sites of the ALTEO Group, it is only permitted to perform work in confined spaces based on a permit issued by the manager of the organizational unit operating the equipment as intended, or the representative thereof, after the necessary consultations. The entry permit is an integral part of the work permit for the work, and is only valid together with it.

What is considered work in a confined space

- Work in confined spaces includes any activity carried out by bending into or entering the given equipment, provided that such space was not designed for entry by persons but, nevertheless, satisfies the following conditions:
 - o space large enough for the entry and stay of at least one worker
 - entry and exit, i.e. escape, is restricted by a narrow entrance and exit opening or in any other way

As far as earthworks are concerned, all activities

- carried out manually in a depth of 1.2 m or more in the technological areas or in the immediate vicinity of technological areas at high-risk sites of the ALTEO Group (MPK; BorsodChem; BC Power).
- during which, irrespective of depth, the work must be carried out by bending below ground level in any work area,
- carried out in a depth of 1.2 m or more, if the conditions of the earthwork do not satisfy the
 requirements set forth in the laws in force at all times, currently Items 5.5, 8.7, 10.1 and 10.2 of
 Section III of Annex 4 of Joint Decree 4/2002 (II. 20.) SzCsM-EüM,
- rated as such by the site manager or the supervisor

are considered as work in confined spaces

An entry permit can only be issued if the persons performing the work meet the required conditions and the technological conditions allow the performance of the work.

Mandatory content elements of the entry permit:

- the equipment in or on which the work is performed must be named in a clearly identifiable manner
- the task to be performed must be described
- the name and signature of the person issuing the permit must be included
- the name and signature of the responsible person controlling the work must be included
- the names of those participating in the work, including observers, must be included
- a list of preparatory operations preceding the entry must be included
- a list of required protective equipment must be included
- preliminary concentration measurement data and regulations for further measurements
- the name and signature of the person performing the measurement and the type of the measuring instrument must be indicated

<u>Note:</u> In the area of MPK, only a representative of the FER fire department may perform preliminary gas concentration measurements. If an appropriate measuring instrument is available, mid-work measurements can also be performed by the person performing the work or the representative of the person issuing the permit.

The entry permit must be issued in 2 <u>copies</u>, one of which should be kept by the person performing the work. This person must keep this copy during the entire work process. The second copy must be kept by the person issuing the permit for 1 year.

An entry permit can be issued for 1 day only; for continuous work, the conditions must be examined every day and a new permit must be issued accordingly.



Personnel and material conditions for work in confined spaces:

Entry in the equipment may only be performed by a Contractor (or its subcontractor) whose entry and the corresponding work are supported by:

- an appropriate number of employees (those entering the confined space and responsible for supervision),
- adequately qualified employees (technology, first aid, etc.),
- employees who are suitable for work in confined spaces and medically fit in accordance with the technology and the expected risks and have a valid medical assessment,
- appropriate machines and work equipment (regularly reviewed, assigned to the appropriate zone),
- the required protective and safety devices (taking into consideration possible risks) and employees who have been trained to use them safely,
- employees have the necessary knowledge regarding occupational health and safety and fire protection,
- the employees are over 18,
- the employees have been trained on the tasks to be performed and the associated risks,
- employees know the mandatory rules of conduct

Addition:

- A person with managerial rights, entrusted with the management and continuous control of the work, must be present during the work
- During the period of work, at least two workers exclusively entrusted with observing the person(s) performing the work in confined spaces, equipped with the required protective equipment and trained, and also physically fit, for rescue must be present on the site (one of them can be the supervisor)
- If the equipment has more than one openings suitable for entry, each additional opening must be observed by 1 supervisor

Dangers arising and to be eliminated during work in confined spaces:

- presence of gases, vapors and dusts that are harmful to health in hazardous concentrations
- lack of oxygen causing suffocation
- presence of corrosive or toxic substances
- presence of flammable and explosive gases, vapors
- rotating, moving internal mechanisms
- presence of electrical equipment
- possibility of fire

Required personal and collective protective equipment:

If the performance of work in confined spaces may lead to the release of substances harmful to health, or such substances may enter the equipment, affected workers must be provided with personal respiratory protective equipment. (It is PROHIBITED to wear a gas mask with a filter insert.)

Instead of using a respiratory protective equipment, protection is considered equivalent if:

- the airspace is analyzed during the entire work, and none of the measured values exceeds the prescribed values
- artificial or natural ventilation can be ensured in a way that the air within the equipment is replaced to the required extent

During work in confined spaces, a reliable information connection must be ensured between the persons working inside and the observers

Depending on the nature of the work, suitable protective clothing must be provided to those working inside and the observers alike.

General requirements for work in confined spaces:

Preparations for work in confined spaces:

- the dangerous equipment must be prepared for entry as required
- the preparatory operations must be recorded separately in writing or defined in the work permit



- if the presence of gases, vapors or dusts harmful to health is detected during preparation, or such substances are emitted from the equipment, the work can only be started after the necessary safety measures have been implemented
- during the preparatory activity, the appropriate protective equipment, the tools and equipment (RB equipment?) to be used must be determined depending on the hazard
- flammable or toxic gases must be kept away from the equipment
- entry is allowed in the temperature range between 5 and 45 °C, which must be ensured by means of cooling or heating during preparation

Isolation, disconnection

Before starting work in confined spaces, the dangerous equipment must be disconnected from other dangerous equipment (e.g. pipelines) in a way that no hazardous substances can enter the equipment.

Dangerous equipment can be disconnected by:

- removing the relevant pipe section and using a blind flange
- · using a blind disc
- using a double shut-off assembly provided that:
 - there must be an assembly between the two assemblies which is connected to the outside space or to the exhaust system
 - o the internal tightness of the assemblies must be checked before entry
 - o shut-off assemblies must be provided with a safety sign and a padlock

Before entry, the activation of machine parts in dangerous equipment must be prevented in a reliable way by de-energizing electrical systems in accordance with MSZ 1585, by mechanical disconnection, or by removing the relevant machine part, and all connected electrical equipment must also be deenergized.

If entry in the confined space may result in contact with large metal surfaces, all electrical equipment where the emergence of external potential could lead to an electric shock must be fed via an isolation transformer. The endpoint of the isolation transformer cannot be divided among multiple consumers.

Airspace analysis

After the preparatory activities have been completed, and before issuing a work permit or starting work, an airspace analysis must be performed in the dangerous equipment in accordance with the provisions of the MSZ-09-57.0033-1990 standard.

If the measured gas concentration is lower than the permitted value, and it is clear that the level of contamination cannot change during the work, it is sufficient to measure the concentration before starting the work. If the work is carried out continuously (e.g. with a one-shift work schedule for several days), concentration measurements must be performed every time work is started.

If the measured gas concentration is lower than the permitted value, but it is expected to increase during the work, the measurement must be repeated accordingly.

The measurement is performed by the person issuing the work permit using his or her own certified instrument, and the measured value and the time of measurement are recorded on the work permit and confirmed by signature.

If the presence or appearance of any flammable or other dangerous (harmful, toxic, etc.) substance cannot be safely ruled out in the work space, or the ventilation of the work space is limited (the level of oxygen may fall below 17%), continuous gas concentration measurement is mandatory for the entire duration of the work, no matter whether gas concentration was measured prior to the issuance of the work permit.

Prior to issuing the permit, and continuously during the work, the following parameters must be measured:

- Harmful and/or toxic vapors/gases;
- Combustible vapors/gases (ARH);
- Oxygen (O2)



The instrument must be capable of automatic alarming. Only certified instruments may be used.

The performance of continuous airspace analysis and the provision of a personal airspace measurement device are the duty and responsibility of the Contractor carrying out the work in confined spaces.

If the work in confined spaces must be performed in an **inert gas atmosphere**, its required presence must be checked by continuous airspace measurement. If the presence of the required inert gas atmosphere cannot be continuously ensured, work in the affected space may not be permitted. Work in an inert gas atmosphere may only be performed using a double safety respiratory system.

If the activity in confined spaces takes place in an airspace where **the concentration of oxygen may rise above the normal level (21 v/v%)**, it must be continuously measured and kept below 23 v/v% in order to avoid an increased risk of fire.

If the **concentration of oxygen is between 21 and 23 v/v%**, activities involving a risk of fire are not allowed, and only electrical devices with an explosion-proof design and non-sparking tools may be used. In the event that the **concentration of oxygen is above 23 v/v%**, any activity may only be permitted and performed based on written operating instructions developed and accepted by all parties involved in the work.

Between 5% and 10% ARH, entry in confined spaces is allowed only for general work, between 10% and 20% ARH only for inspection and cleaning purposes, provided that these activities do not involve a risk of fire or the formation of sparks.

No activity is permitted in confined spaces above 20% ARH, and no work may be carried out in such spaces.

In the event that the concentration of any combustible material in the work space rises above 20% ARH during work in confined spaces, all work must be stopped immediately, all potential ignition sources must be eliminated, and the contaminated airspace must be left as soon as possible. The work may only be continued after the concentration of the combustible material has fallen below the above-mentioned limit, and after the required conditions have been met, subject to a new permit.

Expectations for observers:

Supervisory tasks may only be assigned to a person who is trained and physically fit for rescue activities and has appropriate first aid knowledge.

When working in confined spaces, reliable communication (e.g. oral, signal rope, radio) must be ensured between the persons inside and the observers, but the choice of the appropriate solution must be based on all relevant circumstances (distances, explosion-proof zones).

In the event of work in confined spaces, in addition to those entering the confined space, the Contractor performing the work must provide an appropriate number of **observer(s)**, as specified in the work permit, on the site, whose main task is to secure and, if necessary, immediately rescue those entering the confined space. Observers may not be entrusted with any other task. All observers must have protective equipment and protective clothing at least of the same type and protective capacity as the persons entering the confined space. If gases are likely to appear in dangerous concentrations outside the given device, equipment or tank, at least one continuous gas concentration measurement instrument must be provided. Observers must have continuous contact with those entering the confined space, and they must have proper training, skills, capabilities and equipment to perform rescue tasks.

In the event of work in confined spaces, the number of those entering the confined space and the number of observers must be specified in the work permit in accordance with the following principles:

If the equipment (tank, shaft, etc.) is contaminated with CH substance, the number of those entering it may not exceed 2 for each entry point (e.g. manhole, ladder for climbing down and up for shafts, etc.) The minimum number of observers (not to be entrusted with other work during the work in confined spaces, apart from observation and possible rescue) for one entry point (only those used for entry need to be taken into account) is 2, plus 1 observer for each additional entry point. Deviations from the above are possible depending on the risks associated with the work area and the activity, as well as on the risk mitigation measures.



If the equipment (tank, shaft, etc.) is free of CH (disconnected, cleaned, steamed out, ventilated, etc.), the number of those entering it may exceed 2 for each entry point. In such cases, the number of those entering is determined in the simplified risk assessment and, subsequently, in the work permit. The minimum number of observers (not to be entrusted with other work during the work in confined spaces, apart from observation and possible rescue) for one entry point (only those used for entry need to be taken into account) is 2, plus 1 observer for each additional entry point.



Annex 6: Earthworks

Principles, definitions and regulations related to earthworks

Definitions:

- Earthworks include any activity involving manual or mechanical intervention at a depth of at least 25 cm from the original ground level (excavation, drilling, ramming, landscaping).
- HSE critical activity: work representing a significant risk in itself or performed under special conditions.

General provisions:

Manual or mechanical earthworks are considered to be HSE critical activities. Prior to the commencement of earthworks, the utilities and conduits running underground must be mapped in the relevant area, for which the operator provides information (map extract showing the location of utilities, conduits and cables).

If the position of utilities located underground cannot be clearly determined, mechanical earthworks must be preceded by manual earthworks.

In the case of mechanical earthworks, the contractor must initiate the laying out of the public utility network in the affected area.

As far as earthworks are concerned, all activities

- carried out manually in a depth of 1.2 m or more in the technological areas or in the immediate vicinity of technological areas at high-risk sites of the ALTEO Group (MPK; BorsodChem; BC Power),
- during which, irrespective of depth, the work must be carried out by bending below ground level in any work area,
- carried out in a depth of 1.2 m or more, if the conditions of the earthwork do not satisfy the requirements set forth in the laws in force at all times, currently Items 5.5, 8.7, 10.1 and 10.2 of Section III of Annex 4 of Joint Decree 4/2002 (II. 20) SzCsM-EüM.
- rated as such by the site manager or the supervisor

are considered as work in confined spaces

The general rules for ground preparation and earthworks are currently laid down in Joint Decree No. 4/2002 (II. 20.) SZCSM-EüM.

If the earthwork crosses, touches or approaches within 1m the route of an underground facility, a prospecting trench must be cut along the route in accordance with the depth of the planned earthwork plus 20cm. The prospecting trench must be excavated manually, in a stepwise manner. Prospecting trenches may not be smaller than 1.8 x 0.8m. It is prohibited to use a pick mattock when reaching the marking tape or the cover, further excavation must be performed with extreme caution.

Safety regulations:

- Mechanical earthworks may only be performed with great caution. Do not perform mechanical earthworks in areas where manual earthworks are prescribed.
- When working with a machine, 1 observer must be employed to supervise the work carried out by the machine outside its reach in order to avoid possible incidents causing damage to unexpected conduits or cables not indicated on the maps.
- If the contractor finds unidentifiable wires, cables or ammunition on the construction site, the work must be stopped immediately, and the person who issued the work permit must be notified. This circumstance must be recorded in the construction log.
- All cables and pipelines found in the ground shall be considered to be live and under pressure, respectively, until disconnection from the mains network or pressure release.
- Cables with a damaged insulation or ones that have been cut through may not be touched due
 to the risk of electric shock. In the event of cutting through or damaging a cable or pipeline, the
 operator's contact person must be notified immediately. The area of the defect must be clearly
 delimited; it must not be covered with earth.
- The earthworks that have been interrupted may only be resumed if the elimination of all risks has been confirmed by the person in charge of the relevant field of expertise and after this has been permitted by the person responsible for the area, modifying the working conditions if necessary.



In the event of earthworks, the working pit must be created in compliance with the provisions of the laws in force at all times, currently Joint Decree No. 4/2002 (II. 20.) SZCSM-EüM in a way that:

- The backflow of excavated earth into the working pit can be prevented (by creating rupture plane of at least 0.5m),
- The walls of the working pit are secured against tumbling or collapsing (using struts or an appropriate slope),
- In case of danger, employees are able to leave the working pit safely under all circumstances (this should usually be done using a ladder, which must remain at the construction site throughout the operation),
- a warning barrier must be installed for depths between 0.25m and 1.2m (red and white or yellow and black marking strip, indicating the danger for those approaching the working pit, stretched at a height of 1m),
- a protective guardrail must be installed around the working pit for depths of more than 1.2m (installed with a stable structure at minimum 1m height, e.g. from wooden planks, which physically prevent falling), at a distance of at least 1m from the edge, or a solution equivalent to these protection conditions (e.g. an appropriately sized earth wall).

Conditions for permitting earthworks

The work permit procedure can be started if the following conditions are met and taken into account:

- the minimum number of workers required for the given earthworks:
 - o For manual earthworks, up to a depth of 1.2m 2 persons, including 1 observer
 - For manual earthworks at a depth of more than 1.2m
 persons, including
 observers
 - For mechanical earthworks

- 2 persons, including 1 observer
- the person applying for the permit or his or her representative has passed the supervisor's exam required by ALTEO Nyrt.
- dangerous energies (underground pipelines, electrical lines, control engineering cables) have been mapped in the technological area affected by the earthworks, and they have been isolated, excluded and marked, where necessary
- if required, the conditions for entry are met

Permitting earthworks

Earthworks may only be performed in possession of an earthworks permit at the sites of the ALTEO Group, in the technological areas thereof, or in technological environments. (IE-13/F10).

At the sites of ALTEO Nyrt., an earthworks permit may be issued by the power plant manager, an operations or technical manager, the operations team leader, the day shift manager, or their authorized representative.

Exceptions, special permits:

- for the sites BC Power Plant and Steam Boiler, as well as BC Power, only BorsodChem Zrt. can
 issue an earthworks permit. It is responsibility of the party / contractor performing the earthworks
 (the Contractor) to obtain that permit, which must be countersigned by the operations manager
 or the technical manager of the above sites. The work may only be started if these conditions
 are met.
- For brownfield or greenfield work, if there is a work area handover/takeover and no other agreement has been made, the authorized representative of the party taking over the work area (the Contractor) is entitled to issue the earthworks permit according to their own rules of procedure.
- The regulations of the SHPP (Safety and Health Protection Plan) must be adhered to for investments subject to an SHPP.

Documentation:

Basic documents for performing work:

- work order
- work permit
- earthworks permit



• entry permit, where necessary

Exceptions are greenfield work for which a separate agreement has been signed, and for which the SHPP defines specific regulations.

Validity:

An earthworks permit may be issued for a maximum period of a single shift, with the following exceptions:

- for brownfield work, the earthworks permit may be issued for a maximum of 5 working days, with the proviso that the licensed period may not be interrupted by a public holiday or a rest day, if the SHPP allows this
- for greenfield work, the duration of the earthworks permit issued may be freely determined without any limitation if the relevant provisions of the laws in force at all times, currently Decree No. 4/2002 SzCsM-EüM, are complied with in a controlled manner, and if the SHPP allows this
- For construction projects subject to the preparation of an "SHPP" (Safety and Health Protection Plan), the provisions of the SHPP apply.

Form:



EARTHWORKS PERMIT

Number (date/no.) 20/
Issued by:
Approved by: (power plant manager, operations manager, technical manager, operations team manager, day shift manager, authorized representative)
Validity: from (day) (month) 20 (year), (hours) (minutes) * to (day)
Subject of work
External company performing the work:
Designation and number of plan documentation:
Location of earthworks:
Method of setting out:
Approved manual tools:
Approved earth-moving machine:
Supervision:
Other requirements:
Warning: The work must be stopped immediately as soon as a utility or a sign indicating the presence thereof (protective brickwork, track marking, etc.) is found. In such a case, the work can only be continued after further instructions from the approver.
issuer approver
I acknowledge the provisions of the permit (supervisor of external company):
Name:
Signature:
Dated:
Mandatory annex: Copy of utility drawings

* exceptions are construction activities subject to the preparation of an "SHPP" (Safety and Health Protection Plan) (subject to a building permit), in which case the provisions thereof are applicable.



Annex 7: Work at height

This annex is in line with the effective laws and regulations currently in force in Hungary, as well as with the internal rules; it is an explanatory and informative description thereof.

Applicable regulations:

- Act XCIII of 1993 on Occupational Health and Safety
- Decree No. 10/2016 (IV. 5.) NGM on the minimum level of safety and health requirements
- for the use of work equipment
- Joint Decree No. 4/2002 (II. 20.) SzCsM-EüM on the minimum occupational safety and health
- requirements to be implemented at construction workplaces and during construction processes
- Alteo procedure IE-13. Safe, non-hazardous work requirements for each workplace and work process
- HSE requirements for Alteo Contractors

General provisions:

Act XCIII of 1993 on Occupational Health and Safety

For work processes where the employee may be exposed to sources of hazards, effective protection must be implemented, unless otherwise required by separate legislation, through the use of closed technology, or, if this is not possible, through the **application (or, where necessary, simultaneous application) of collective technical protection, organizational measures and personal protective equipment.** The priority of collective technical protection compared to individual protection must be taken into consideration.

• Decree No. 10/2016 (IV. 5.) NGM.

Temporary work in an elevated workplace: Unless otherwise provided for in this Decree, **work at a level difference of more than 1 meter on a non-permanent, short-term basis**, performed in a place where the working conditions do not meet the safety and ergonomic requirements, so **specific risk prevention measures are required.** In workplaces involving a risk of falling in or falling down, or where the worker and those within the scope of the work are threatened by falling objects, protection must be provided by means of fencing, covering or other suitable solutions. Specific risk prevention measures must be implemented if the work equipment is used in an elevated workplace where:

- there is a material immediately adjacent to or below the place of work, irrespective of the level difference, which poses a risk of suffocation;
- the work equipment is operated from a platform, scaffold or stage.
- a workplace meeting all safety and ergonomic requirements is located higher than 1m.
- Joint Decree No. 4/2002 (II. 20.) SzCsM-EüM on the minimum occupational safety and health... Falling from a height must be prevented using suitable equipment, particularly a scaffolding structure providing adequate protection. The scaffolds must be massive, sufficiently high and have at least one foot board, one middle board, and railings or an equivalent solution.

Work at height may only be performed using appropriate and suitable equipment, or ensuring collective technical protection (e.g. lifting platform, protective net, protective grid, mobile erecting scaffold). If, due to the nature of the work, the use of such equipment is not possible, a suitable access solution must be found, and the person performing the work must be provided with personal protective equipment preventing falls from a height.

Protection must primarily be provided with equipment preventing employees and the materials used from falling down. If that is not possible, personal protective equipment must be used.

Protection against falling from a height can be provided by properly dimensioned and fixed covers or foot boards, middle boards and railings in three rows, with a height of 1m and a spacing of not ore than 0.3m, or any other solution providing an equivalent level of protection. Where a protective net or protective grid is used, its mesh size must not exceed 10cm x 10cm.

If there is a risk of falling in or falling down, and the work can only be carried out by disassembling safety elements (railing) or bending over them, the use of personal fall protection equipment is mandatory.

When using personal fall protection equipment, the supporting points must be chosen so that they have an appropriate load capacity as required by the standards MSZ EN 795 and MSZ EN 959 for mobile and fixed (bored or glued) supporting points, respectively, and, if possible, they are above the persons performing the work.



For work at height, tools, parts and machines must be positioned (or, in the case of machines, fixed) in a way that their possible fall does not pose an additional risk in the work area below. In such cases, the movement of persons under the work area must be restricted during work.

Work at height is considered a critical activity, so at least 2 people are required to perform it. This is also necessary to ensure that the employee is not kept suspended for more than 15 minutes during a possible fall or during the operation of the fall protection system, in order to avoid suspension trauma. Also, if possible, the rescue of the colleague should be started as soon as possible. Persons working at a height must have a valid medical fitness certificate (for work at heights) and must be demonstrably trained in the use of protective equipment.

So, to sum up, at sites and facilities owned or operated by ALTEO, during construction, maintenance, repair, operation tasks, if there is a level difference of more than 1m. In that case, first of all, appropriate collective protection must be ensured – scaffold, podium, railing, protective grid, protective guardrail or protective net. If that is not possible due to the nature of the work or the work area, the employee must be provided with appropriate personal protection, i.e. the appropriate equipment must be available to and usable by them. In such cases, recommended equipment (in addition to basic occupational health and safety equipment) includes:

- full body harness MSZ EN 361
- industrial safety helmet MSZ EN 397
- positioning lanyard MSZ EN 358
- energy absorber, Y-strap energy absorber MSZ EN 355, 358
- retractable fall arrester MSZ EN 360
- fixing ropes MSZ EN 354
- harnesses MSZ EN 566
- carabiners, connecting elements MSZ EN 362
- mobile and fixed bored or glued supporting points MSZ EN 795, 959
- ropes with low elongation (below 5%) MSZ EN 1891



Annex 8: Installation of scaffolds

For works requiring scaffolding at the sites of the ALTEO Group, the construction of scaffolding is performed by contractors. Ordering scaffolding works:

- a) The contractor installs (or has its subcontractor install) the scaffolds for its own work
- b) An authorized employee of the ALTEO Group has the scaffolds installed (by an external contractor) for the work to be performed by the Contractor
- 1. Inspection and approval of the scaffold construction process in case a) above (installation by the Contractor for its own work):
 - The Contractor orders the scaffolds and has them erected by another contractor selected by it
 in the work area that has previously been handed over to it
 - The Contractor takes over the finished scaffolding from the relevant contractor through a handover procedure (scaffold handover records are required, according to the Contractor's rules of procedure, in compliance with the provisions of these regulations)
 - The Contractor reports the completion of scaffold construction to the issuer of the work permit and presents the scaffold handover documents
 - The issuer of the work permit checks the finished scaffolding, and, if it is deemed appropriate, he or she approves the putting into use of the scaffolding by countersigning the scaffold handover records. The scaffolding is qualified by filling out the scaffold inspection sheet (see the attached scaffold inspection report) and checking what is included in it. The countersigned scaffold handover documentation is kept by the party who ordered the scaffolding, and, from then on, the scaffold inspection sheet is to be handled together with the work permit.

Exception: For greenfield or brownfield work, after the work area handover procedure, the Contractor designs, erects, has another party erect or uses its scaffolding in a manner according to its own procedure. The Customer's representative checks the adequacy of the scaffolding (adequacy and documentation of construction) within the framework of regular site visits and inspections. In case of inadequate scaffolding or deficiencies, the Customer and the Contractor draw up a report.

- At the end of the inspection procedure, the issuer of the work permit places a "green" sign on the scaffolding to indicate that it can be used for work. (If "standard" scaffolding cannot be erected in the given area, the scaffolding must be provided with a yellow sign, meaning that work on the scaffolding is only possible with the use of a fall arrester)
 - Note: After the procedure has been completed, all additional tasks related to the scaffolding are the responsibility of the party who ordered the scaffolding (user).
- 2. Process of scaffold construction in case b) above (an authorized member of the ALTEO Group has the scaffolding installed for the Contractor):
 - The authorized person orders the scaffolds and has them erected by a selected contractor. If
 the scaffolding is erected in a work area that has already been handed over, no repeated work
 area handover procedure needs to be completed; otherwise, the work area must be handed
 over to the party erecting the scaffolding after carrying out the appropriate procedure.
 - Prior to starting the construction of the scaffolding and before the work permit is issued, the ordering party checks whether construction can be started. (Do they have, if necessary, a scaffolding plan, a structural sketch or general structural documentation? Are the personnel and material conditions given for scaffold construction?)
 - After the scaffolding has been erected, the ordering party checks, and then takes over from the
 contractor, the finished scaffolding through a scaffold handover procedure (scaffold handover
 records are required). The scaffolding is qualified (inspected) by filling out the scaffold inspection
 sheet and checking what is included in it.
 - The scaffold handover documentation and the scaffold inspection sheet are to be handled together from then on.
 - The ordering party hands over the finished scaffolding to the work group actually using it (Contractor) through a simplified handover procedure. At the end of the procedure, a "green" or "yellow" sign is placed on the scaffolding to indicate that it can be used for work.



Scaffold handover records:

The scaffold handover records must be prepared by the contractor erecting the scaffold. The records must contain at least the following:

- scaffold construction plan, scheme, etc. (if necessary)
- declaration stating that the stand was erected according to the regulations and the scaffolding plan (if necessary)
- · definition of the load capacity of the scaffolding
- declaration stating that the scaffolding can be put into use
- name of party erecting the scaffolding, date of construction and handover
- It is the task and responsibility of the ordering party to fill in the scaffold inspection sheet.

The scaffold to be erected must be provided with an appropriate identifier (a number, a label referring to the location, etc.) The assigned identifier must be included on all documents related to the scaffold.

3. Necessity and availability of a scaffolding plan

A scaffolding plan is required:

The construction of scaffolding is **subject to a scaffolding plan**, with the exception of benches made of elements specified in the relevant product standards, ladder scaffolding not higher than 20.0m, and metal scaffolding exposed to a load of max. 2000N/m2.

A structural sketch is required:

For the construction of benches made of elements specified in the relevant product standards, ladder scaffolding not higher than 6m, and metal scaffolding exposed to a load of max. 2000N/m2 with a height of max. 6m, as well as scaffolds only made of standard elements.

General structural documentation is required:

For scaffolds for the construction of which a structural sketch is insufficient, but a scaffolding plan is not yet required (e.g. design loads are higher than specified in the standard, special junctions are necessary).

Prior to starting the work, the scaffolding plan, the structural sketch, and the general structural documentation are presented to the ordering party for approval.

4. Personnel conditions for scaffold construction

Scaffold construction or demolition work may only be carried out under the control of a person who is appropriately qualified as defined by law and entitled to take action, and who is also responsible for the implementation of occupational health and safety regulations.

The assembly of the scaffolding may only be performed by persons who have attended training for this task and have been deemed fit for this work by the company's specialist occupational physician. (The training is provided by the contractor, who must demonstrate this, as well as medical fitness, in a documented manner.)

If the scaffolding is higher than 2 meters, a sufficient number of helpers must be present for the construction, and, to ensure work safety, one of the workers must be entrusted with controlling the work, and his or her co-worker(s) must be informed of this fact.

5. Material conditions for scaffold construction

The ordering party must, jointly with the party erecting the scaffold, determine the minimum area necessary for erection depending on the activity to be performed and the height of the scaffold. When erecting, demolishing, or reconstructing scaffolds, the assembly area must be fenced off. Furthermore, spot checks must be made with respect to the compliance and integrity of the collective and/or personal protective equipment to be used during the work processes (assembly column or railing, full body harness, fall arrester, limitation of movement), as well as the scaffold elements.





6. Inspection of ambient conditions:

- A permit for scaffold construction may only be issued if the uniformity and load capacity of the underground is in line with the parameters of the scaffold to be erected.
- The appropriate safety distance must be determined for any nearby electric cables or wires.

7. Takeover of finished scaffolding

After the scaffold has been erected, it must be inspected and taken over in a documented manner by an authorized person through a handover procedure (scaffold inspection sheet, scaffold handover records). The test must include the following:

- Conformity of the scaffolding with the plans, compliance of building elements
- Whether the scaffolding has been provided with protection against tipping (for scaffolds exceeding 2.5m)
- Stability of structural elements (e.g. foundation, lengthening, bracing, anchoring),
- Safety equipment (e.g. access ladders, railings, foot boards, load capacity, other signs, fire protection, lightning protection, connection to the equipotential bonding grid)
- Whether it is suitable for the type and nature of the work to be performed
- Whether it corresponds to the expected load resulting from the work (max. load capacity must be indicated)
- Whether it allows safe work and movement.

8. Putting the scaffolding into use

Irrespective of size limits, the scaffolding can be put into use through a simplified handover procedure after the "Scaffold handover records" have been created. The party handing over the scaffolding will be the builder, while the party taking it over will be the representative (supervisor) of those working on the scaffolding. The party taking over the scaffolding checks the original handover documentation of the scaffolding and then visually inspects it. If they deem the scaffolding acceptable, they countersign the original handover records.

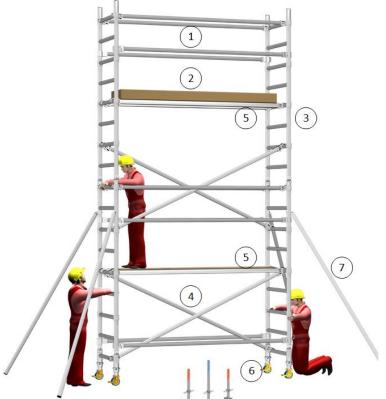
A fixed information board with a size of 30*15cm, made of weatherproof, rigid material, must be attached to the scaffold (this is the responsibility of the party erecting the scaffold, not identical with the green and yellow signs), which must contain at least the following information:

- the location for which the scaffold was made;
- the name of the company that built the scaffold;
- the date of handover;
- name and signature of the responsible person who inspected the scaffold before handover and declared its conformity, as well as the name and contact details of the person who handed over the scaffold:
- the load capacity of the scaffold (kg/m2);
- the type of the scaffold.

Do not use the scaffold if there is no indication proving handover and usability.



Attention: In addition to the documented inspections, a daily check must be performed before starting work, which is the task and responsibility of the person directly controlling the employees and the work.



- 1. Railings
- 2. Ankle rail longitudinal and transversal
- 3. Vertical frame
- 4. Braces longitudinal and transversal
- 5. Walking surface, platform6. Rolling or threaded legs
- 7. Side support (for scaffolds higher than 2.5m)



No.:		A						
		SCAFFOLD INSPECTION RECORDS			() астео			
Date:		Definition of work area:	(Contractor:				
Scaffold identifier:		Inspection performed by:	<u>i</u>					
		On behalf of the Customer:						
Docum	ents used for inspection	On behalf of the Contractor	:					
scaffolding plan structural sketch itemized structural documentation standar						design		
No.:	Designation of insp	pection			Yes	No	not checked	
1.	The scaffolding cor	The scaffolding corresponds to the approved plan (sketch).						
2.	The materials used	materials used are of adequate quality and undamaged						
3.	The footing and sta	The footing and stability of the scaffolding is adequate for the entire structure						
4.	The ground under the scaffolding is sufficiently stable							
5.	The material, dimensions, splicing and supports of the scaffolding are good							
6.	The width of the so	The width of the scaffolding platform is appropriate for the work to be performed						
7.	There is at least 190cm clear height between scaffold elements above each other							
8.	Scaffold levels are	Scaffold levels are adequately accessible						
9.	The scaffolding is f	The scaffolding is fixed appropriately (side support, attached to the wall)						
10.	Access ladders are	ladders are sufficiently stable (between base and levels)						
11.	Access ladders bet	dders between levels are provided with trapdoors						
12.	The trapdoors for t	odoors for the access ladders between levels work properly						
13.	The three-row prote	e-row protective guardrail is adequate and complete everywhere						
14.	End railings are av	nd railings are available and properly fixed						
15.	The max. distance	ax. distance between posts used for fixing railings is 3.0m.						
16.	The scaffolds are p	s are properly connected to the equipotential bonding grid						
17.	The scaffolds are p	re properly grounded						
18.	Load capacities are	capacities are indicated on the scaffolds						
19.	Personal protective	ective equipment is available for non-standard scaffolds						
20.	For specially desig a documented mar	ned scaffolds, users' attention has been drawn to the risks in oner						
Deficiencies identified		Deadline for repair	Person responsible	for repair		Signatu	re	
				<u> </u>				
Pocult of inchestion		Compliant			Must not be put into use			
Result of inspection Compliant Based on the performed inspection, the scaffold may be put into				a over	iviust f			
use use	on the performed inspe	споп, те ѕсапою тау ве р	ut into Party handin	y over		г апу t	aking over	