Occupational Health and Safety Policy

1. Purpose

SEA is committed to providing and maintaining a safe and healthy working environment for all employees, contractors, visitors, suppliers and other persons who may be affected by our activities.

We recognise that effective occupational health and safety management is an essential part of our business operations. We are committed to preventing work-related injury and ill health, eliminating hazards where possible, reducing occupational health and safety risks, and continually improving our health and safety performance.

2. Scope

This policy applies to all activities undertaken by SEA, including:

- Manufacturing and production activities
- Welding, cutting, grinding and fabrication
- Handling and processing of steel, wire, rods and other materials
- Operation of machinery and production equipment
- Lifting operations and use of overhead cranes
- Forklift and other vehicle operations
- Loading and unloading activities
- Storage and handling of materials and products
- Maintenance and repair activities
- Office and administrative activities
- Transportation and logistics activities
- Contractors, visitors and other third parties working on Company premises

3. Our Commitments

SEA is committed to:

1. Providing safe and healthy working conditions for the prevention of work-related injury and ill health.
2. Complying with all applicable occupational health and safety legislation, regulations and other requirements.
3. Identifying hazards and assessing occupational health and safety risks associated with our activities.
4. Applying the hierarchy of controls to eliminate hazards and reduce risks.
5. Providing appropriate information, instruction, training and supervision to employees and contractors.
6. Providing and maintaining suitable personal protective equipment (PPE) where risks cannot be adequately controlled by other means.
7. Ensuring machinery, equipment and workplaces are properly maintained and safe to use.
8. Maintaining appropriate emergency preparedness and response arrangements.
9. Consulting and involving workers in matters affecting their health and safety.
10. Investigating accidents, incidents, near misses and unsafe conditions and implementing appropriate corrective actions.
11. Monitoring health and safety performance and taking action where improvement is required.
12. Continually improving our occupational health and safety management system.

4. Risk Assessment and Hazard Management

We will systematically identify hazards arising from our activities and assess the associated risks.

Risk assessments will consider, where applicable:

- Machinery and equipment
- Manual handling
- Lifting operations
- Working at height
- Forklift and vehicle movements
- Welding, cutting and hot work
- Electrical hazards
- Chemicals and hazardous substances
- Noise and vibration
- Dust and fumes
- Fire and explosion risks
- Workplace conditions
- Ergonomic risks
- Contractor activities
- Emergency situations

Controls will be implemented according to the hierarchy of controls, prioritising elimination and engineering controls before administrative controls and PPE.

Risk assessments will be reviewed periodically and whenever there are significant changes to processes, equipment, materials, personnel or working conditions.

5. Training and Competence

SEA will ensure that employees and contractors receive appropriate health and safety training for their roles.

Training may include:

- General workplace health and safety
- Safe operation of machinery
- Lifting and crane operations
- Forklift operation
- Manual handling
- Welding and hot work
- Chemical handling
- Emergency procedures
- Fire safety
- PPE requirements
- First aid
- Environmental and spill response

Only competent and appropriately authorised personnel may operate machinery, vehicles, lifting equipment or undertake specialist activities.

6. Personal Protective Equipment

Appropriate PPE will be provided where risks cannot be adequately controlled through other measures.

Depending on the activity, PPE may include:

- Safety footwear
- Safety glasses or face protection
- Hearing protection
- Protective gloves
- Protective clothing
- Welding helmets and protective equipment
- Respiratory protection
- High-visibility clothing
- Fall protection equipment

Employees are required to use PPE correctly, maintain it in good condition and report damaged or unsuitable equipment.

7. Machinery, Equipment and Lifting Operations

All machinery, tools and equipment shall be suitable for their intended purpose and maintained in a safe operating condition.
Guards, safety devices and emergency stops shall not be removed, bypassed or deliberately disabled.

Lifting operations shall be appropriately planned and carried out by competent personnel using suitable and inspected lifting equipment.

Particular attention shall be given to the safe handling of heavy reels, steel products, wire, rods and other materials.

8. Chemicals and Hazardous Substances

Hazardous substances shall be identified, assessed and controlled in accordance with applicable legislation and Company procedures.

Safety Data Sheets (SDS) shall be maintained where required, and employees shall receive appropriate information and training regarding the safe storage, handling and disposal of hazardous substances.

Exposure to welding fumes, solvents, coatings, dust and other hazardous substances shall be controlled using appropriate engineering and administrative measures.

9. Workplace Health

The Company will take reasonable measures to protect workers from occupational health risks, including:

- Excessive noise
- Vibration
- Dust and airborne contaminants
- Welding fumes
- Chemical exposure
- Manual handling
- Repetitive activities
- Poor ergonomics
- Workplace temperature and environmental conditions

Where required, appropriate occupational health monitoring and medical surveillance will be undertaken in accordance with legal requirements and identified workplace risks.

10. Emergency Preparedness

SEA will maintain procedures for responding to foreseeable emergencies, including:

- Fire
- Serious injury or illness
- Chemical spills
- Environmental incidents
- Equipment failure
- Major lifting or structural incidents
- Evacuation
- Other relevant emergency situations

Emergency equipment, fire protection equipment, first-aid facilities and emergency routes shall be maintained and regularly inspected.

Employees will receive appropriate emergency training and participate in drills where required.

11. Incident and Near-Miss Reporting

All employees and contractors are encouraged and expected to report:

- Accidents
- Injuries
- Near misses
- Unsafe conditions
- Unsafe behaviour
- Equipment failures
- Hazardous situations

Incidents will be investigated to identify underlying and root causes. Corrective and preventive actions will be implemented to prevent recurrence.

Employees will not be penalised for reporting genuine safety concerns or near misses.

12. Contractor and Visitor Safety

Contractors and visitors shall comply with SEA's health and safety requirements while on Company premises.

Contractors may be required to provide evidence of competence, risk assessments, method statements, insurance and other relevant documentation before undertaking work.

Contractor activities shall be monitored where appropriate to ensure that agreed safety requirements are followed.

13. Consultation and Worker Participation

SEA recognises the importance of worker consultation and participation in maintaining a safe workplace.

Employees are encouraged to:

- Raise health and safety concerns
- Suggest improvements
- Report hazards and near misses
- Participate in risk assessments where appropriate
- Participate in safety meetings and inspections
- Contribute to investigations and corrective action

No employee will be disadvantaged for raising a legitimate health and safety concern.

14. Health and Safety Performance

The Company will establish and monitor appropriate health and safety objectives and performance indicators.

Performance may include:

- Accident frequency and severity
- Lost-time injuries
- Near-miss reporting
- Safety inspections
- Corrective action completion
- Training completion
- Risk assessment completion
- Equipment inspection compliance

Performance will be reviewed by management and used to identify opportunities for continual improvement.

15. Responsibilities

Senior Management

Senior management is responsible for providing leadership, resources and support necessary to implement this policy and maintain effective health and safety controls.

Managers and Supervisors

Managers and supervisors are responsible for:

- Implementing health and safety requirements
- Ensuring risk assessments are completed
- Providing appropriate training and supervision
- Ensuring equipment and workplaces are safe
- Addressing unsafe conditions promptly
- Reporting and investigating incidents

Employees and Contractors

All employees and contractors are responsible for:

- Working safely
- Following Company procedures and instructions
- Using required PPE
- Reporting hazards, incidents and near misses
- Maintaining equipment in safe condition
- Taking reasonable care of their own health and safety and that of others affected by their activities

16. Legal and Other Requirements

SEA will identify, maintain access to and comply with applicable occupational health and safety legislation, regulatory requirements and other commitments relevant to its operations.

Where appropriate, the Company will align its occupational health and safety management system with recognised standards, including **ISO 45001: Occupational Health and Safety Management Systems.**

17. Continual Improvement

We are committed to continually improving our occupational health and safety performance.

This will be achieved through:

- Regular risk assessments
- Worker consultation
- Safety inspections
- Incident and near-miss investigations
- Training and competency development
- Performance monitoring
- Management review
- Corrective and preventive actions
- Periodic review of this policy

18. Management Commitment

Management recognises that occupational health and safety is a fundamental business responsibility and not solely the responsibility of individual employees.

We will provide the leadership, resources and support necessary to maintain a safe and healthy workplace and expect all employees, contractors and visitors to contribute to achieving this objective.

Frantisek Plachy
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SEA Enterprises a.s.

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