



5|3

OCCUPATIONAL HEALTH AND SAFETY



Bartosz Wiśniewski

OHS Department Director in ONDE

KEY FACTS AND INDICES FOR 2021

- **0** severe, fatal and collective accidents on all construction sites of ONDE S.A.
- **3rd** place and a recognition in the Safe Construction competition
- **464** participants in the Safety Week

5.3.1 Description of due diligence policies and procedures in the OHS area

As a part of the Integrated Management System operated in ONDE S.A., corresponding to the requirements of ISO 45001:2018, ISO 14001:2015 and EMAS according to the Regulation of the European Parliament and of the Council (EU) No. 1221/2009, as amended, in the Integrated Management System Policy (IMS Policy) was adopted. According to this policy, the Company Management Board adopted as its superior objective, provision of competitive services in the RES, power lines, engineering and roads construction sectors, while fully observing all legal and other requirements associated with OHS

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Our mission is to strive to limit our negative environmental impact as far as possible, and the supreme aim concerning the safety is to maintain zero severe, fatal and collective accidents

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Dyrektor Działu BHP w ONDE**

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and environmental protection. The assumptions of this policy are translated into principles of the ONDE Group operation in the document called ONDE S.A. Integrated Management System Manual (IMS Manual), containing objectives related to environmental and OHS management, established as guidelines for management of the organisation. According to the IMS Manual, maintaining of the highest OHS standards and provision of services according to the principle of minimising the negative environmental impact are priorities in daily functioning of ONDE S.A. The IMS Manual covers a number of detailed instructions and guidelines concerning due diligence procedures and responsibilities for their observance, as well as establishes a hierarchy of control over those areas. The ambition of ONDE, as one of the RES sector leaders, is to actively participate in promotion and development of projects using the renewable energy sources while maintaining the highest standards of safety during their execution. This approach to OHS is achieved through an uncompromising observance of regulations and development of a high safety culture. We feel responsible not only for what we do and how, but also for the environment in which we operate. We actively shape, among others, awareness of our suppliers of services and customers, through communicating to them principles of our IMS Policy. Our mission is to strive to limit our negative environmental impact as far as possible, and the supreme aim concerning the safety is to maintain zero (severe, fatal and collective) accidents.

Thinking about safety of all people involved in works on projects executed by ONDE, their health and safety, we created our OHS strategy, called 7 safety pillars:

1. Development of procedures and occupational safety scenarios.
2. Disqualification of all compromises concerning safety.
3. Education and awareness building showing that construction investments can be accident free.
4. Development of standards and continuous building of safety standards among contractors.
5. Promoting of positive attitudes of OHS leadership, regardless of a position.
6. Continuous improvement of standards of work organisation for teams, technological training courses, and processing of technical solutions.
7. Implementation of adopted safety standards at each level of the organisational structure.

All ONDE S.A. employees and the Company Management Board are involved in implementation of the OHS strategy, and main areas of these activities cover:

- commitment and leadership,
- adherence to the highest standards of safety,
- planning and monitoring,
- training,
- internal consultations.



DOKUMENTACJA ZINTEGROWANEGO SYSTEMU ZARZĄDZANIA GRUPY ERBUD



POLITYKA ZSZ

POLITYKA ZINTEGROWANEGO SYSTEMU ZARZĄDZANIA

Polityka ONDE S.A. realizowana jest zgodnie z wymaganiami: ISO 45001:2018, PN-EN ISO 14001:2015 oraz EMAS wg. Rozporządzenia Parlamentu Europejskiego i Rady (WE) Nr 1221/2009 ze zmianami. Zarząd ONDE S.A. przyjmuje jako cel nadrzędny świadczenie konkurencyjnych usług inżynieryjnych, budowlano – drogowych, w zakresie remontów i modernizacji dróg i mostów oraz w energetyce przy pełnym respektowaniu wszelkich wymagań prawnych i innych związanych z BHP i ochroną środowiska. Zarząd ONDE S.A. jest zaangażowany w doskonalenie w zakresie BHP, w celu zapewnienia bezpiecznej organizacji pracy wszystkim swoim pracownikom, pracownikom firm współpracujących oraz innym osobom trzecim przebywającym na terenie firmy, w tym na placach budów realizowanych przez Spółkę.


Podejście w ONDE S.A. do kwestii BHP i OŚ oparte jest na zaangażowaniu w przestrzeganie przepisów i tworzenie wysokiej kultury bezpieczeństwa.

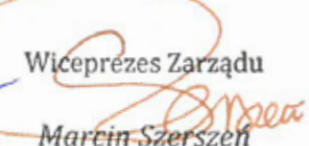
Tak określone podejście realizowane jest poprzez:

- systemowe podejście do zarządzania BHP i środowiskiem,
- utrzymanie wysokiej jakości wyrobu/usługi przy zachowaniu stabilnego poziomu finansowego
- ustanawianie zadań dotyczących poprawy stanu BHP i oddziaływania na środowisko oraz organizowanie okresowych przeglądów oceniających skuteczność systemu zarządzania w osiąganiu tych celów,
- proces monitorowania przestrzegania przepisów na realizowanych inwestycjach,
- systematyczne szkolenie pracowników, podnoszące ich kwalifikacje i poczucie satysfakcji z pracy,
- spełnienie wymagań prawnych oraz innych przepisów dotyczących działalności Spółki,
- zapewnienie bezpiecznych i zdrowych warunków pracy w celu zapobiegania urazom i złemu stanowi zdrowia,
- eliminowanie zagrożeń i redukcja ryzyka BHP,
- ciągłe doskonalenie działań w zakresie zarządzania środowiskowego i BHP,
- konsultowanie i uczestnictwo pracowników ONDE S.A. w problematyce ZSZ
- wywieranie wśród pracowników własnych oraz podwykonawców poczucia wzajemnej odpowiedzialności za bezpieczeństwo oraz podnoszenie kultury BHP i OŚ
- zarządzanie ryzykiem w obszarze BHP za pomocą hierarchii nadzoru,
- propagowanie Polityki ZSZ wśród podwykonawców oraz klientów ONDE S.A.,
- ciągłe doskonalenie standardów pracy (zabezpieczeń) wpływających na poprawę środowiska pracy,
- ciągłe doskonalenie efektów działalności środowiskowej,
- minimalizowanie niekorzystnych wpływów na środowisko poprzez zapobieganie zanieczyszczeniom

Zarząd ONDE SA zapewnia, że Polityka Zintegrowanego Systemu Zarządzania poprzez wysoką świadomość pracowników jest zrozumiała, wdrożona i realizowana na wszystkich szczeblach przedsiębiorstwa przy zachowaniu zgodności ze strategicznymi celami Spółki oraz publicznie dostępna dla wszystkich Zainteresowanych na naszej stronie internetowej www.onde.pl.

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Occupational Health and Safety Management System and certification



To ensure the highest standards of safety at ONDE S.A., we implemented the Occupational Health and Safety Management System conforming to ISO 45001:2018 (HSMS). The certificate of conformity was awarded following the external audit conducted by the Quality Certification Centre of the Military Technical Academy.

The scope of this certification covers:

- General contractor services in the construction sector for RES, power lines, and engineering and road building sector.
- Construction of wind and photovoltaic farms, engineering and technical facilities, including for the power supply sector and the industry, large-size structures with accompanying infrastructure, and maintenance, overhaul and refurbishment works.

Functional limits of the environmental, occupational health and safety management system cover all contractors, subcontractors and organisational units within physical limits, and temporary construction, bitumen mass manufacturers (WMB), refurbishment and storage facilities and other auxiliary processes and subprocesses, as well as business cars used.

Planning and monitoring (including annual OHS status analyses)

The achieved success motivates us for further improvement of our procedures and to raise the bar in the OHS area. Every 12 months we perform a comprehensive review of the effectiveness of the OHS management system, including levels for achieving objectives and challenges.

This analysis is a basis for establishing measurable general company objectives and specific objectives for three main segments of ONDE activities: wind farms, photovoltaic systems, and road construction. Once a year, the documentation containing the analysis together with relevant conclusions is submitted to the ONDE S.A. Management Board.

The document from the OHS status review contains, among others:

- ONDE S.A. code of order performance;
- evaluation of risks specific for the OHS area;
- objectives card (containing an action plan, resources necessary for its implementation, responsibilities, performance dates, and objective performance ratios).

The due diligence procedures include confirmation of consistence of work conditions at our construction sites with strict OHS standards in force at ONDE S.A. as a part of:

- inspections of OHS Specialists, covering operations of the Company and subcontractors;
- supervisors inspections at construction sites
- internal audits;
- monitoring of OHS coordinators, who coordinate works at a given construction site. Those coordinators are appointed by construction site managers and perform their activities in their name.

A regular analysis of accident causes, implementation of preventive actions at all construction sites of the Company, and an analysis of potentially hazardous events also represent an important part of actions supporting due diligence.

The Company Legal Department ensures conformance to legal requirements concerning OHS. When regulations governing its activities change, procedures in force at ONDE S.A. are analysed for their compliance with newly implemented regulations. The Company documentation is adjusted to them following consultations with the Management Board, with an emphasis on current communication with employees.





OHS trainings

We regularly focus our activities on education of our personnel and subcontractors in OHS regulations and our additional obligations in this area. Information training sessions cover all employees without any exceptions, so we maintain a high culture of care for safety at ONDE S.A. Apart from induction training, we also provide periodic training. The visitors to our construction sites are also required to acquaint themselves with applicable OHS rules. Additionally, we verify whether all subcontractors have necessary licenses as required by relevant legislation.

In consequence, we create a deep awareness of significance of OHS and environmental protection issues among our employees, and a high sense of responsibility for their own safety, and safety of their environment. The continuous dialogue ensures that people employed at the Company construction sites know OHS risks and are informed on a regular basis about near misses and accidents at the Company, and the Construction Safety Partnership alerts are communicated to them.

We believe that issues of safety at construction sites concern people executing a given investment, as well as the land on which the works are conducted. This is manifested by combining OHS and environmental protection issues within tasks of one department of ONDE S.A.

OHS status consultations with employees

We ensure that our employees are involved in improvement of OHS conditions. Their participation in the decision-making process at its various stages represents one of the forms for building their

high commitment and an attitude of adherence to OHS procedures in force at ONDE S.A.

Consultations with employees cover several stages:

- employees representatives participate in the Occupational Health and Hygiene Committee at the central level, and in OHS risk assessments at construction sites;
- representatives of employees or subcontractors also participate in regular OHS inspections and meetings;
- construction site managers consult subcontractors on risks and work methods covered by Method Statements.

Apart from described procedures, we provide employees with an option to notify current remarks, their ideas and reservations by electronic mail.

5.3.2 Accident ratios in the ONDE Group

In consequence of continuous activities focusing on maintaining and improving safety of ONDE S.A. employees, the accident ratios - accidents number, frequency and severity - are maintained at low levels. A fast increase in employment motivates us to specific care ensuring that new employees are aware of the OHS culture in our Company from the very beginning and learn standards in force in this area while being induced into their responsibilities.

In 2021, we achieved our main OHS objective: we did not record any collective, fatal or severe accident. 5 individual, minor accidents occurred at the Company. In their consequence, our employees were incapable to work for 170 days in total.

In 2021, the accident frequency ratio in the ONDE Group dropped by 2.5 times versus the previous year and amounted to 4.15. The accident severity ratio was at a level of 34.0, remaining at the same level as in 2020.

Table 9. Accident ratios at ONDE S.A.

Year	Number of manhours	Number of accidents	Frequency rate*	Number of days lost	Severity**
2021	1 203 456	5	4.15	170	34.00
2020	893 872	10	11.19	332	33.32

* Calculated according to the formula: number of accidents at work x 1,000,000 / number of manhours worked.

** Calculated according to the formula: number of lost days / number of accidents at work.

The table below shows accident rates including the subsidiary design agency IDE Projekt – operating in the photovoltaic farms sector. The lack of comparative data results from the fact that

this company joined the ONDE Group only on 19 April 2021 (date of purchasing 100% shares in the company).

Table 10. Accident ratios in the ONDE Group in 2021

Year	Number of manhours	Number of accidents	Frequency rate*	Number of days lost	Severity**
2021	1 263 936	5	3.96	170	34.00

* Calculated according to the formula: number of accidents at work x 1,000,000 / number of manhours worked.

** Calculated according to the formula: number of lost days / number of accidents at work.

No occupational diseases were reported in the ONDE Group.





The most important objectives of ONDE are maintaining the severe and fatal accidents and further work on improving safety at ONDE S.A. construction sites

Table 11. Table with accident ratios for subcontractors

Year	Number of manhours	Number of accidents	Frequency rate*	Number of days lost	Severity**
2021	4118472	2	0.49	---	---

Table 12. Table with accident ratios for subcontractors and employees of the ONDE Group

Year	Number of manhours	Number of accidents	Frequency rate*	Number of days lost	Severity**
2021	5382408	7	1.30	---	---

** Calculated according to the formula: number of lost days / number of accidents at work

Table 13. Accidents in the ONDE Group broken by the injury type

Item	Injury type	ONDE Group
1	Amputation	1
2	Sprain	0
3	Shock	0
4	Crush	0
5	Burn	0
6	Cut	1
7	Punch	0
8	Fracture	1
9	Fracture of fingers	0
10	Bruising	0
11	Other injury	1
12	Dislocation	1
13	Crack	0
14	Poisoning	0
15	Irradiation	0
16	Drowning	0

Injuries types are listed according to guidelines for completing a statistical ZKW GUS sheet.



Due diligence procedures in analyses of accident and near misses

At ONDE S.A. all accidents at work are subject to an extensive analysis. When any occurs, a post-accident documentation is drawn up and primary causes are determined. To prevent occurrence of such events in the future, corrective actions are initiated within the entire Company.

Managers of all construction sites, contract managers, directors and OHS specialists are involved in their performance. A register of accidents is maintained within the ONDE Group.

Furthermore, alerts with information about hazardous situations, their causes and methods to avoid risks are created not only for accidents, but also for near misses. Alerts are sent not only to the Company employees but also to all companies being members of the Construction Safety Partnership (PBB). Information to PBB is provided immediately after the accident is reported or in a collective list, no less than once a month.

The same people who participate in corrective actions after accident are involved in corrective actions concerning near misses from main risk groups and other situations hazardous to life or which may result in significant environmental losses. Active preventive actions and education contribute to shaping of the highest OHS standards in the Company.

A list of main risks concerning accident rates is drawn up in ONDE, and it is verified during annual verification of the OHS status. The list is created

using conclusions from analyses of accidents that occurred.



Principal categories of risks with potentially severe consequences

In the ONDE Group, 6 main principal risk categories with the largest potential for severe consequences (severe and fatal accidents) were identified for conducted constructions. The said risks result from statistics of previous accidents at the ERBUD Group. statistical data collected for years by the Construction Safety Partnership, and results of statistical data presented in reports of the National Labour Inspectorate. We believe that by eliminating risks in those main categories we will be able to avoid severe and fatal accidents.





5.3.3 Initiatives in the OHS area

Construction Safety Partnership

(GRI 102-12)

The signatories of the Construction Safety Partnership (PBB) are 15 general contractors. The Partnership activities focus on reduction of accident rates at construction sites by sharing safety standards and awareness of OHS rules among construction site workers, as well as striving for observance of relevant procedures - also by subcontractors. This way, it contributes to reduction in risks and to prevention accidents.

The PBB activities translate into:

- common OHS standards;
- common contractual OHS requirements for subcontractor companies;
- database for sharing OHS knowledge and experience for signatories;
- organisation of actions improving employee awareness - including actions being
- a part of the Safety Week;
- organisation (together with the National Labour Inspector) a national edition of the Buduj Bezpiecznie (Safe Construction) competition;
- coordination of talks with public entities (GDDKiA, PIP, local governments) and legislators concerning systemic changes to improve safety at construction sites.

The ONDE Group, as a part of the ERBUD Group, shares the PBB values and observes OHS standards in force in it. Furthermore, the Company is a member of Construction Safety Partnerships at two District Labour Inspectorates,

in Bydgoszcz and in Szczecin. The details of obligations undertaken under PBB are also included in the internal standards of ONDE S.A. As a part of joint care for safety and sharing of OHS knowledge and experience, the companies associated within PBB pass to each other alerts concerning accidents that occurred at them. ONDE S.A. belongs to the PBB notification system and provides received data to managers of its construction sites on a regular basis, to use them as a basis for improving procedures for preventing hazardous situations.

Safety Week

The Safety Week is a cyclic PBB initiative aiming at improving OHS awareness of employees and subcontractors. Furthermore, according to our own priorities, since 2019 we have been presenting environmental protection issues to its participants. Personnel of each ONDE construction site plan its own practical activities for the Safety Week, including training courses in works on height, first aid, or readiness to respond to incidents. Frequently, other partners are involved in those actions and organisation of the events, for example, the National Labour Inspectorate, fire brigades, or units of the voluntary fire brigade.

In 2021, as a part of construction projects executed by ONDE S.A., 464 employees and subcontractors, including 199 own employees, participated in the Safety Week. Employees of 43 subcontractor companies were engaged in these activities. In total, 42 events, presentations and training sessions were organised at all construction sites, during which extensive practical education actions were conducted

They concerned, for example, fire prevention, and evacuation from a construction site when a hazard occurs, and involved rescue activities and first-aid training courses.

"Buduj Bezpiecznie" Competition

The Buduj Bezpiecznie (Safe Construction) competition is a competition organised by the National Labour Inspectorate at the national level, of which PBB is a partner. It recognises companies caring for high OHS standards during construction. It is organised centrally, as well as at local levels, by District Labour Inspectorates. ONDE S.A. (earlier as PBDI SA) has been successfully participating in it since 2014.

In 2021, the Company took the 3rd place in the Buduj Bezpiecznie competition of the District Labour Inspectorate in Szczecin for execution of the Banie III Wind Farm project, and was awarded a recognition of the District Labour Inspectorate in Gdańsk for construction of the Szymankowo Wind Farm.

In total, since 2014 we have won eight awards and recognitions

5.3.4 Protection of employees health and life

Our care for health and life of our employees is reflected from the very beginning of our cooperation, in confirmation of their required background (education and training), validity of their medical screening certificates, and the OHS knowledge required by law together with knowledge of additional



procedures in force at the Company. Apart from training provided, we make employees aware of their responsibility

for observance of the OHS standards at construction sites.

We provide all employees at construction sites with working and protective clothes, and with necessary personal and collective protective equipment, and we monitor their obligatory use. We provide machines and other equipment necessary to execute the construction projects that meet legal requirements and safety standards.

All our employees are covered by private healthcare at TU Zdrowie at the basic level (occupational medicine), and for additional fee this cover can be expanded with additional packages. The conducted tests and examinations also include psychometric tests for drivers exceeding the scope required by the legislation.

We also care for health and safety of our subcontractors (more in section 5.5 of the Report).

Protection of employees against accidents at work, occupational disease and other diseases associated with work environment at ONDE S.A. is a part of responsibilities of directors and managers of production units.

Emergency situations and prevention

As a part of preventive OHS activities, we identify potential emergency situations and methods to prevent them, which we include in documents such as HASP (Health and Safety Plan) and Method Statements (instruction for safe performance of construction works). We are also ready to quickly respond to emergencies. In this regard, we conduct periodic drills, train employees in first aid and inform them about procedures to follow in the event of an emergency, accident or a fire. If any crisis situation or an incident hazardous to employee health occurs, we

undertake remedy actions necessary to avoid them. They are extensively communicated to managing personnel and employees.

Safety procedures during the COVID-19 pandemic

During the COVID-19 pandemic, at the ONDE Group we implemented safety measures in force in the entire ERBUD Group and the Construction Safety Partnership. They were also used in the reported period. They allowed us to maintain a low infection rate among the Company employees and to complete executed construction projects without downtime.

The safety standards covered, among others:

- protective measures and devices used to monitor employees' health;
- procedures to follow when an employee developed COVID-19 symptoms;
- recommendations for safe organisation of work in the office and an option for remote work for offices;
- recommendations for safe organisation of work at construction sites,
- limiting the number of people working at the same time at a construction site to a necessary minimum by introducing a shift work and rotation of breaks,
- preparing graphic instructions on safety standards and displaying them at appropriate, well-visible places in offices and at construction sites,
- disinfection of rooms,
- COVID-19 tests for employees,

Furthermore, in 2020 managers of construction sites and contract participated in remote training sessions covering planned actions when a COVID-19 infection was discovered or suspected.

