

STANDARD OF KAZAKHTELECOM JSC

"OCCUPATIONAL SAFETY AND HEALTH CARD" PROGRAM

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Nur-Sultan

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1 GENERAL SITUATION

The Occupational Safety and Health Card Program (hereafter the Standard), which allows employees to observe and report hazards, unsafe conditions/actions/behaviors, potentially unsafe incidents and good practices, and to make offers for safety and health improvement (hereafter the OSH) is a foundational element of a proactive approach to OSH risk management.

This Standard defines the general process of its implementation in Kazakhtelecom JSC (hereinafter - the Company), as well as the roles and responsibilities of the participants involved. The Standard describes the structure and organization required to support an effective system of reporting on observations at all facilities of the Company.

The standard is intended to promote employee participation in its implementation in order to further improve the culture of OSH in accordance with the Company's Occupational Safety and Health Policy.

2 DEFINITIONS / ABBREVIATIONS

Good practice - A method/treatment, process, activity, or exemplary behavior that exceeds standard practice and has been shown to be effective in achieving excellent OSH performance or contributing to OSH improvement

Hazardous factor/unsafe condition - Potential source of damage or condition that could result in injury, environmental exposure, or property damage

Unsafe action/behavior - Any observed action/inaction or behavior of employees that is in violation of established rules and has the potential to cause injury, environmental or property damage.

Potentially hazardous incident (almost happened) - Any event that did not result in a reportable injury or property damage, or environmental damage, but in other circumstances could have resulted

Offer - New and specific idea/offer to improve OSH in the Company

OSH - Occupational Safety and Health

OSH service - Occupational Safety and Health Service

Occupational Safety and Health Council - is headed by a chairman, elected by the members of the council from among representatives of the employer and employees on a rotating basis at two-year intervals.

CO = Central Office

3 PURPOSE

The Occupational Safety and Health Card (OSH Cards) program was introduced at KAZAKHTELECOM JSC (hereinafter referred to as the Company) to identify and

report hazards, unsafe conditions/actions/behaviors and potentially hazardous incidents, and to obtain offers for improving the OSH condition with the primary purpose of eliminating and/or controlling risks of injury or damage to the environment and/or property.

The purpose of this document is to describe the stages of the OSH Cards program, its implementation, employee training, observation procedures and data analysis. This document also serves as an accessible guide for all employees on how to use the OSH cards.

4 FIELD OF APPLICATION

This procedure applies to all facilities/departments/sections of the Company.

5 ROLES AND RESPONSIBILITIES

This procedure defines the following responsibilities for the following program participants:

1) Chairman Of The Board

Demonstrates its commitment to the OSH Cards program;

Provides sufficient resources and budgets for the implementation and ongoing development of the OSH Cards program;

Leads by example and participates in the implementation of the OSH Cards program incentive scheme.

2) Directors/Managers

Demonstrate their commitment to the OSH Cards program;

Provide resources and budgets to provide the implementation and ongoing development of the OSH Cards program;

Lead by example and participate in the implementation of the OSH Cards program incentive scheme.

3) Heads Of Departments/Objects

Provide implementation and facilitate implementation of the OSH Cards program at their sites/departments and actively promote the program among accountable personnel;

Provide resources and budgets for the implementation of the OSH Cards program;

Assign persons responsible for the implementation of the OSH Cards program at the site/division;

Provide timely and effective corrective actions are taken for observed hazards/unsafe conditions/actions/behaviors and potentially hazardous occurrences;

Coordinate the preparation of a monthly review of OSH Cards Program results, the timeliness and status of corrective actions, and the communication of program results to facility/department personnel.

4) Persons Responsible For The Implementation Of The "OSH Cards" Program

OSH service coordinate, promote and maintain the OSH Cards program within their department/facility, including training employees, coordinating OSH Cards throughout their life cycle, reviewing each observation to confirm/verify potentially hazardous incidents (near incidents), tracking corrective action implementation, coordinating the OSH Production Council and reporting on program performance;

Provide immediate corrective action is taken by the observer, notifying the person in charge of the site to take further corrective action if necessary to provide that all identified unsafe conditions, activities and events are addressed in a timely and effective manner;

Report all significant unsafe conditions/activities to the site/division Manager;

Inform site/division personnel about the work of the OSH Works Council, the results of the program (through meetings, posters on bulletin boards);

Provide openness and accessibility to all information on the OSH Cards program.

5) Public Employees

Participate in the OSH Cards program by making observations and completing OSH Cards;

If possible, intervene and/or take immediate corrective action and immediately report all observed hazards/unsafe conditions/actions/behaviors/potentially hazardous occurrences to responsible individuals or facility/departmental OSH service representatives;

Make offers to improve OSH in the Company as necessary;

Receive training in the OSH Cards program (as required);

If necessary, attend meetings of the Production Council on OSH at facilities/departments.

6) OSH Service Manager

- 1) Provide resources and budget allocation for the OSH Cards program and incentive scheme;
- 2) Provides support to the facilities/departments of the Company for the successful

implementation and further development of the program;

- 3) Provides for the application of the OSH Cards program incentive scheme in accordance with the established procedure;
- 4) Regularly participates in meetings as a member of the OSH Production Council.

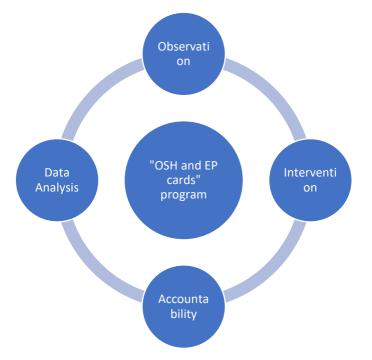
7) OSH Service Manager Of The CO

- 1) Provides for the issuance and updating of all procedures for the OSH Cards program;
- 2) Provides a regular report on the results of the OSH Cards Program;
- 3) Approves the annual analytical report on results and improvement plans for the OSH Cards program;
- 4) Regularly participates in meetings as a member of the OSH Production Council.

6 PROCEDURE

The OSH Cards program is an integrated system for reporting hazards/unsafe conditions/actions/behaviors, hazards and offers and ideas for improving OSH.

The OSH Cards program includes the basic steps described in detail below



1) Basic Principles Of The "OSH Cards" Program

All employees of the Company and employees hired under a civil agreement <u>have</u> <u>the right to intervene and report through the OSH cards</u> if they notice any hazards/unsafe conditions/actions/behaviors or events.

<u>No naming and looking for blame - observation data shall not be used to place</u> blame/responsibility on a employee or work group to encourage more open and sincere personnel behavior, avoid confrontation and looking for an object of criticism. For statistics, the card shall include only the name of the department whose employees were monitored, but not the names of employees or groups of employees. However, if a potentially hazardous case is confirmed, the observer may be asked to provide more detailed information for further investigation.

2) Observation

The OSH card may be used to make scheduled (e.g., director/manager OSH rounds) or unscheduled observations of unsafe conditions, unsafe behaviors, potentially hazardous occurrences, and to report good practices or make offers for improving OSH.

3) Intervention

If a hazardous factor/unsafe condition/action, behavior or incident is observed, each employee shall immediately intervene, stop work and eliminate the risk (if possible) and inform their manager/OSH Service/responsible person.

If a hazardous factor/unsafe condition is observed, an attempt shall made to eliminate it, if possible. If there is no possibility of eliminating the hazard, and if there may be a high risk to personnel, the work shall be suspended, the site, if possible, shall be isolated and the site manager shall be immediately informed.

When an unsafe action/behavior is observed, the observer shall intervene, discuss the situation with the person being observed (in a safe environment), explain the risks and possible consequences of the unsafe behavior/action, recommend necessary corrective measures, and then provide that corrections are accepted and work continues safely.

When a potentially hazardous event is observed, the observer shall immediately intervene and take corrective action to minimize the risk of injury or damage (e.g., stop work, isolate the area, etc.) and immediately notify the person in charge of the area/ direct manager and the OSH Service.

When observing good practice, it shall be noted with positive comments / feedback of the person / group/ team performing the work.

4) Accountability

After intervening and/or taking immediate corrective action, the observer shall complete a OSH card.

The OSH card is also used to make **offers and ideas for improving OSH**, which are considered at OSH Works Council meetings. These offers may be rewarded.

If possible, the observer may attach photographs, diagrams, or other information to the card that will facilitate understanding of the observation/offers described.

5) OSH Cards Processing

Individuals assigned to be responsible for program implementation at the site/division review completed OSH cards and verify the appropriateness and sufficiency of the immediate actions taken and, if necessary, assign additional corrective actions and responsible performers. They provide that the OSH cards are recorded in the database and track the actions through to full completion and provide feedback to the observer.

Every observation (except for "good practice") shall be reviewed by site/division OSH service representatives to determine whether or not it is a potentially hazardous case.

If the observation is a potentially hazardous case, the site/division OSH service will change the category of this card to "potentially hazardous event," which will be investigated in accordance with established procedures.

If the observation is not a potentially hazardous case, the site/division's OSH service representatives will review it and enter it into the database as an OSH card.

All submitted OSH-related offers shall be reviewed by the OSH Works Council. If the offer is deemed unreasonable, economically inefficient or impractical, the card is registered and rejected in the database. In all cases, feedback shall be provided to the observer.

The quality of all completed OSH cards shall be checked by the team leaders and designated persons responsible for the implementation of the program at the facility/department prior to registration in the database. If the fact of constant incorrect filling in of cards by individual employees is detected, a repeated course of training or verification and updating of training materials, if necessary, can be conducted for them..

6) Register OSH Cards In The Database And Track Actions

For tracking purposes, each OSH card is entered into the database with an individual number.

Registration of cards is done by the OSH service.

Prior to registration, all cards shall be reviewed by the person in charge/OSH service and corrective actions shall be assigned. Corrective/preventive actions shall be defined in such a way that their implementation will eliminate the cause of the hazardous condition in order to avoid its recurrence or mitigation. No action shall be assigned to an employee/department without prior approval.

If corrective actions require the involvement of a third party, then the person responsible for tracking the status and closing the actions in the database is assigned to the area where the unsafe condition/action/behavior was observed, who shall provide that the assigned actions are fully implemented and sufficient to eliminate the cause of the unsafe condition and to prevent its recurrence.

However, if the identified hazard/unsafe behavior cannot be corrected or the offer cannot be implemented by the facility/department or is not under its control, then such observations shall be referred to the OSH Manager.

Registrars of OSH cards and persons responsible for closing corrective actions shall regularly monitor actions in the database and provide their timely and effective execution/ closure, as well as attach documents confirming the implementation of each completed action. The designated persons responsible for the implementation of the program at the facility under the "OSH Cards" program shall monitor the status of actions and coordinate the process of timely completion of corrective actions in order to minimize the number of overdue actions.

7) Data Analysis

The site/division OSH Operations Council conducts a monthly (on an approved schedule) review of OSH cards data to identify critical unsafe acts and factors, common trends and root causes, establish areas of focus that require comprehensive action, and verify the closure status of assigned corrective actions.

7 "OSH Cards" Program Training

The Central Office OSH Service Manager develops training materials for the program, which include e-learning for all employees.

All employees of the Company, including newly hired employees, are required to complete the OSH Cards training program.

8 MOTIVATION

Above all, the motivation for participating in the OSH Cards program, intervening, eliminating and reporting unsafe conditions/behaviors is to take care of each other, to provide safe working conditions so that all employees return to their families healthy and unharmed.

In support of this, Company managers and facility supervisors shall promote the program, demonstrate their commitment, actively participate, encourage safe practices, and serve on the OSH Production Council.

Assigned site/division program implementers shall establish two-way communication with employees, as well as provide feedback on completed cards to their initiators. They shall inform site/division employees about the work of the program, the results of meetings of the Production Council on OSH, decisions made, and corrective actions implemented or planned, if necessary, to develop and produce posters and posters containing the above information.

Also, as an additional incentive for personnel, regular awards are given to observers based on the results of the work done under the OSH Employee Incentive Procedure.

9 PROCESS SCHEME

