TROJAN
CONSTRUCTION GROUP

HEALTH & SAFETY POLICY

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Occupational Health and Safety Policy

Introduction

The Occupational Health and Safety (OHS) Policy (the Policy) outlines guidelines of Trojan Construction Group – Sole Proprietorship LLC (TCG) and its subsidiaries (henceforth referred to as the Group) on the health, safety, and well-being of its employees and external parties (vendors/suppliers, contractors, service providers, etc.) working with the Group at its premises. Respecting the principle of human life and well-being, the Group prioritizes safeguarding the lives and health of its employees in all corporate activities, fostering a corporate culture grounded in safety and sustainability.

Scope

This Policy applies to TCG, and its subsidiaries that do not have existing related policies suitable to their operations. The Policy applies to all areas of the Group's business operations, covering all directors, executives, and employees working for or on behalf of the Group. It also extends to outsourced or seconded employees working exclusively for or on behalf of the Group. The Policy also applies to its external parties working at its premises. The Group encourages these external parties to adopt similar policies in line with the Group's Supplier Code of Conduct and applicable local OHS standards.

Policy Statement

The Group is committed to achieving excellence in OHS management through partnerships with the federal and local authorities of the host countries of its operations. This commitment ensures that operations are undertaken in a safe, responsible, and sustainable manner, aligning with the proactive implementation of OHS practices as seen in its subsidiaries and adhering to the principles upheld by industry standards.

OHS Management

The Group is dedicated to evaluating and implementing a OHS management system aligned with contractual, statutory, and regulatory requirements, including ISO 45001:2018 standards where suitable. The Group supports its operational subsidiaries in obtaining certification of their respective management systems where necessary. The Group enables, through implemented management systems across the operations of its operational subsidiaries, the identification of hazards, management of OHS risks, and implementation of emergency preparedness procedures. The Group is committed to continuous improvement through Plan, Do, Check and Act cycle activities including routine audits, inspections, and monitoring processes, fostering a work environment that prioritizes safety and health.

OHS Excellence

The Group firmly believes that the well-being of its employees and stakeholders is of cardinal importance. This belief guides the Group's commitment to providing all necessary resources to ensure corporate and ethical obligations towards OHS are met, safeguarding relevant stakeholders from the impacts resulting from its operations and nurturing a "Safe Working Environment".

The Group strives to maintain safe and healthy working conditions while promoting individual well-being. The Group is steadfast in its belief that all incidents, injuries, and occupational illnesses are preventable, with the attainment of OHS excellence being a responsibility shared by relevant stakeholders. The Group's goal is to integrate OHS performance into executive remuneration, encouraging a culture of safety and responsibility throughout the company.

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Innovation

The Group's approach encourages workplace innovation strategies to enhance OHS, particularly during changes in managing, organizing, and deploying both human and non-human resources. While recognizing the pragmatic challenges in entirely eliminating hazards, our strategy is rooted in the more achievable goal of "reducing OH&S risks." This nuanced approach ensures a practical and sustainable focus on creating a safer working environment for all.

Stakeholder Engagement

The Group fosters close relationships with key stakeholders so that there is a clear understanding of their OHS concerns. Through stakeholder engagement, the Group identifies OHS factors that are important to stakeholders and integrates these considerations into this Policy.

The Group encourages its stakeholders to align with its OHS culture, promotes collaboration to achieve zero harm as TCG believes all incidents are preventable, and communicates on lessons learnt and best practices as and when relevant.

The Group's commitment to promoting consultation and participation of workers and, where applicable, workers' representatives.

Training and Awareness

The Group is committed to continuously investing in the training and development of its employees and external parties on matters pertaining to OHS management and excellence. The Group aims to regularly instil awareness and promote a clear understanding of the principles outlined in this Policy, empowering individuals to uphold these standards and mitigate risks effectively. The Group enables its employees and external parties to ensure a "Duty of Care" to stakeholders associated with its operations, such that every employee and affiliated external party take personal ownership of their safety as well as that of others.

Compliance

The Group ensures regular monitoring of its activities for compliance with applicable laws and regulations in the jurisdictions where it operates. The Group undertakes internal audits of its OHS practices annually, reporting the outcomes to relevant stakeholders and seeking external audits to align its commitments with industry standards.

Roles and Responsibilities

The Chief Executive Officer (CEO) is responsible for setting the Policy (including any revisions thereof) and monitoring its compliance. The Chief Operating Officer (COO) and / or General Managers of subsidiaries along with respective Health and Safety department heads, managers or supervisors are responsible for the implementation of this Policy and continuous improvement within their operational areas. All individuals working for or on behalf of the Group are responsible for upholding principles set forth in this Policy.

Reporting and Transparency

The Group encourages open reporting of concerns or potential hazards, including near misses, without fear of reprisal.

The Group discloses its OHS initiatives, issues, and performance to its stakeholders as and when required, including undertaking to communicate its progress on the United Nations Global Compact (UNGC) principles annually where relevant to health, safety and well-being of its people.

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Policy Review

The Group believes in continually improving its performance from all the activities it undertakes or services it provides. The Group will review this Policy if and as required, and revise this to ensure it remains up-to-date and aligned with the company's Mission, Vision, core values, laws and regulations of the host countries of its operations, and with global best practices. The Group shall make available on the appropriate channels any changes to this Policy, and every version will have an updated effective date. Stakeholders are advised to refer to the Group's official channels for the most recent Policy.

This Policy was last reviewed in September 2023.