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(digital signature)
Ahti Asmann
Member of the Board
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(digital signature)
Jaanis Sepp
Member of the Board
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Procedure for Admission of Contractors to the Territory of Viru Keemia Grupp and for Detecting Violations

1. General Provisions

- 1.1 The purpose of this procedure is to regulate the admission to the territory of Viru Keemia Grupp AS, Kirde Varad AS and their subsidiaries (*hereinafter referred to as VKG*) as well as to other areas used by VKG, and it also contains the principles for recording violations and imposing sanctions.
- 1.2 The requirements specified in this procedure are mandatory for a client and contractors, and the compliance with this procedure is confirmed in the contract. If necessary, additional conditions and measures may be added to the contract.
- 1.3 A client has the right to pay unexpected visits to carry out inspection in order to ensure compliance with safety requirements. If violations are detected, sanctions will be applied in accordance with Annex 1.
- 1.4 The procedure includes:
Annex 1. VKGj.TTO/69 – L1 Contractual Penalty Rates

2. Definitions

- 2.1 A **Client** is a person or a unit responsible for the efficient and safe operation of a device/piece of equipment, technological or work process.
- 2.2 An **Executor** (a **Contractor**) is a person or a unit performing maintenance, repair, and other types of works and services for the Client.
- 2.3 A **Serious Violation** is intoxication, the concealment of accidents, persistent dangerous behaviour, endangering people's health, life and/or company property, and other incidents that might have equivalent impact.
- 2.4 An **Incident** is an event or a sequence of events that have brought about or could have brought about undesirable consequences, such as health damage, damage to the environment and/or property (occupational accident, fire, explosion, etc.).
- 2.5 A **Hazardous Situation** is an unfavorable situation that, under certain conditions, may result in personal injury or property damage. It can be caused by both dangerous conditions and dangerous behaviour.
- 2.6 A **Hazardous Condition** is a situation where people, property, and environment are exposed to one or multiple hazards. For example, defective tools or equipment, insufficient protective devices and warning systems.

- **Dangerous Behaviour** is a dangerous way of behaviour. When an employee either intentionally or unintentionally violates safety rules and/or ignores possible hazards/risks.
 - **Near-miss** is an unforeseen event that, under different circumstances, could have caused damage to health, environmental and/or property.
- 2.7 **Zero Tolerance** means that any kind of deviation from the principles set out in the safety policy get a response.

3. Compliance with Safety Requirements

- 3.1 Uniform safety rules are valid on the territory of the Group, and their violation is prohibited and may entail liability, in accordance with the present procedure and the contract.
- 3.2 The Contractor is obliged to familiarize all of its employees and involved third parties with the safety rules that are valid on the territory of the Client before starting work.
- 3.3 All such employees of the Contractor who are permitted to stay on the premises of the Group must undergo introductory and initial occupational safety training at least once a year.
- 3.4 All such employees of the Contractor who have undergone training and are permitted to enter the territory of the Group are obliged to inform the Client every time:
 - when they enter the territory of the Group;
 - and/or when they start work in a new work site area or at a new location.
- 3.5 All employees of the Contractor and involved third parties must follow the safety rules of the Group.
- 3.6 Dumper trucks that are used on the premises of the Group must be equipped with a tilting motion warning signal to reduce the risk of property damage and increase safety in the production area.
- 3.7 Contractors are required to follow the traffic rules that are valid on the territory of the Group.
- 3.8 Contractors must provide documentary evidence confirming the competence and professional suitability of their employees (for example, for working at heights) before starting work on the premises of the Group.
- 3.9 The Contractor is obliged to immediately inform the Client about any incidents, near-misses or dangerous situations that are related to its employees or activities on the territory of the Group.
- 3.10 The Contractor's employees must not start or continue work in a situation that is dangerous or when working conditions (e.g. noise, vibration, odour, etc.) have become abnormal. The Client must be notified of such a situation immediately. The employees of the Contractor must not start or continue work in a situation that is dangerous or when working conditions have deteriorated, as compared to normal (for example, noise, vibration, odour, temperature or lighting have significantly increased or changed). The Client must be notified of such a situation immediately.
- 3.11 The Client that has ordered the performance of work is responsible for preparing the work site, and he must ensure that the conditions necessary for the safe performance of the work are met.
- 3.12 The Contractor is obliged to visually inspect the workplace before starting work and inform the Client of any possible faults or dangers.
- 3.13 After the work is completed, the Client is obliged to accept the work, making sure that the work has been performed in accordance with the agreed conditions, and that the work site has been cleaned up.

- 3.14 Failure to comply with safety requirements is a serious violation of job tasks. The violator must be suspended from work immediately and appropriate measures must be taken in accordance with the safety policy of the Group.

4. Access to the Territory and Work Conditions

- 4.1 The procedure for allowing the employees of the Contractor to enter the territory of the Group includes: completing an entry application for gaining access to the territory of the Group (including the employees of subcontractor organizations), for motor vehicles and other self-propelled vehicles:
- the application process takes place in the electronic environment:
<https://www.vkg.ee/sissepaasuluba-energia/>;
 - the Contractor must familiarize itself with the present procedure and other instructions independently on the official website:
<https://www.vkg.ee/partneritele/>;
 - completing an introductory safety training.
- 4.2 The Contractor is obliged to ensure compliance with the rules of conduct and relevant requirements that are established in the legislation of the Republic of Estonia as well as with the procedures and rules established by the Group.
- 4.3 To make sure that safe conditions are provided while staying on the premises of the group, the Contractor is obliged to ensure that all employees connected with the contract comply with the requirements related to protective clothing and equipment:
- special work clothing that conforms to the specific character of the work being performed;
 - special protective footwear which must be fully closed, antistatic, provide protection against puncture and impact hazards, have a non-slip sole pattern and be resistant to aggressive environments (oil and acid resistant);
 - safety helmets (secured with a strap when working at heights) with the Contractor's logo/name on it;
 - safety goggles, gloves and other personal protective equipment (PPE) that is required to provide protection against work-related hazards.
 - The Contractor shall be responsible for the condition and usability of the PPE provided to its employees. It is forbidden to use damaged, altered or expired personal protective equipment.
- 4.4 The Contractor shall be responsible for the equipment that it delivers to the territory of the Group:
- the equipment must comply with all valid safety requirements and be checked before use;
 - all employees who work with the equipment must undergo training and follow the operating procedure;
 - it is forbidden to bring to the territory and to use damaged, altered or uninspected equipment (if the inspection is mandatory according to law or the requirements of a manufacturer);
 - if the device has a predetermined expiration date, it is forbidden to use this device after expiration date.
- 4.5 The Contractor is obliged to make sure its employees behave correctly and prevent aggressive attitudes towards the employees of the Group.

- 4.6 The Client has the right to remove an employee of the Contractor in case of violation of the rules and to restrict his further access to the territory of the Group, including the manager supervising the work.
- 4.7 The Group has the right to claim compensation for damage from the Contractor if the damage has been caused by the Contractor's actions or inaction.

5. Consequences of Violations

- 5.1 If any violations of safety requirements have been discovered, the Client may, depending on the severity of the violation and the circumstances, under which it has occurred, issue a warning, impose a fine, or prohibit the violator from further access to the territory of the Group. In case of repeated violations, the Client has the right to terminate the contract with the Contractor.
- 5.2 The Client shall apply absolute zero tolerance in all cases when it was discovered that an employee of the Contractor has been staying on the premises of the Client under the influence of alcohol, drugs, psychotropic or other substances. In each such case, a fine in the amount of 1,000 euros will be imposed upon the Contractor. The employee that has committed the violation will be banned from accessing the territory of the Group for one year. If such incidents occur repeatedly in the organization of the Contractor, the Client reserves the right to deny full access to the territory of Viru Keemia Grupp and its subsidiaries to the organisation of the Contractor.
- 5.3 All violations shall be recorded in the register of Dangerous Situations.
- 5.4 If a fine has been imposed, the Client will write an official report concerning the violation.

Viktor Siverin
Group Safety Manager

Revision	Brief Description of Changes
2	Updated revision