

INA GROUP MAJOR-ACCIDENTS PREVENTION POLICY (MAPP)

Through the continuous improvements of the Process Safety Management System (PSM), INA, d.d. and other INA Group companies are systematically working on improving the identification of hazards and the prevention of major accidents which may endanger the lives and health of the employees and citizens in the surrounding area, the environment or the company reputation, and cause significant material damage or damage to the business continuity. The Process Safety Management System includes the identification, understanding and control of the hazards associated with hazardous substances which are present in the processing or storage, with the aim of preventing accidents and minimising the consequences in case of major accidents. The Process Safety Management System (Safety Management System) elaborates the following:

Organisation and personnel: The tasks and responsibilities of all INA Group Companies employees, and especially the managers of all levels, are defined in the main governance and operative regulations of INA Group, particularly in the following documents:

- a. INA Group Corporate Governance,
- b. SD&HSE Management System at INA Group Companies,
- c. Process Safety Management at INA Group Companies,
- d. Operative regulations referring to the process technology, equipment, employees and external suppliers. All managers and employees are aware of their responsibilities with regard to safe work and the prevention of major accidents, they are educated and trained for action, and their responsibilities have been determined in written procedures. The liabilities of contractors in the field of health, safety and environment protection are determined through contracts, depending on the type of works and the hazard zone where they are performed.

Identification and evaluation of major hazards: The identification and evaluation of major hazards arising from regular activity and emergencies are determined through the process hazard analysis and risk assessment, in accordance with the governing law and internal regulations. The identification and assessment of significant hazards encompass all phases of operation, including the supplier activities and the assessment of consequences and likelihood of events.

Operational control: In accordance with governing law and the internal regulations, the instructions and procedures for safe operations are defined within INA Group companies, regular functional testing is conducted, as well as the maintenance of equipment, plants and the process control and management system, with the aim of reducing the likelihood of equipment failure. Plant operation supervision includes the management and control of the risks associated with the ageing of equipment and plants caused by corrosion, as well as the appropriate corrective measures and monitoring of follow-up.

Management of change: The procedures of documented change management are implemented in the existing equipment and plant modification phase, as well as the management of change relating to employees and work organisation.

Planning for emergencies: The scenarios of possible emergency events are identified through the systematic analysis of process hazards, based on which the plans for interventions in emergency situations are prepared, tested and periodically analysed. All the participants of the intervention, evacuation, protection and rescue activities (employees and contractors on location) shall be appropriately trained and equipped.

Monitoring performance: Internal regulations prescribe the systematic assessment of compliance with the objectives set out in this Policy, internal regulation and the Process Safety Management System, as well as the implementation of preventive and corrective actions. The reporting system for near-misses, injuries, process incidents, road incidents, environmental pollution and major accidents is in place and performance is systematically evaluated through safety performance indicators. Any major incident or high potential near-misses are investigated in detail, and lessons learned and recommendations are communicated within the INA Group Companies.

Audit and review: The management shall periodically analyse and evaluate the efficiency of the Process Safety Management System, as well as its compliance with this Policy and legal requirements. The necessary amendments to internal regulation and the Process Safety Management System, which were indicated through the audits and business review, shall be conducted by the persons/managers of the organisational units who are responsible for the individual business area.

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