

OCCUPATIONAL HEALTH AND SAFETY POLICY OF TELELINK BUSINESS SERVICES

1. Aim and purpose.

Telelink Business Services strives to meet the needs of its customers and of the market by offering comprehensive services for design, development, construction, implementation, maintenance and monitoring of information, communication, and security systems, as well as customer training to work with the implemented telecommunication and information solutions. For this purpose, our employees are one of the most valuable assets of the company and we strive to provide them with healthy and safe working conditions. In this regard, the company is committed to:

- Identify hazards and manage risks by implementing the necessary measures to prevent accidents and occupational diseases.
- Include employee representatives in decision-making related to risk minimization measures and ensuring healthy and safe working conditions.
- Inform the employees about the hazards related to the activity they perform.
- Provide safe equipment and safe work processes.
- Comply with all legal requirements in the country related to health and safety at work and in accordance with the company's activities.
- Continuously improve the management system on health and safety at work.
- Motivate employees by providing periodic training and development and creating an appropriate microclimate of the work environment.

TBS is committed to constantly improve its policy on health and safety at work, for this purpose it regularly monitors the effectiveness of processes and consults with employees. We are constantly striving to build, implement and develop a culture of health and safety in the company.

2. Scope

This occupational health and safety policy applies to all employees of Telelink Business Services and has been developed in accordance with the applicable requirements and the established principles and rules in the company.

3. Responsibilities in ensuring health and safety at work.

Telelink Business Services has defined and announced the obligations and responsibilities related to ensuring health and safety at work.

The Executive Director of the company assumes responsibility for the health and safety of employees, ensures compliance with all legal requirements related to healthy and safe working conditions and to ensure a safe and healthy working environment and ensures the availability of the necessary resources to comply with and implement this policy.

Each Director and Team Leader is responsible for ensuring the health and safety of all employees in their team and guarantees that they have received appropriate training. They regularly carry out inspections of workplaces in their areas of responsibility. They ensure the implementation of and compliance with all existing and new health and safety specific arrangements, procedures

and working practices to secure compliance with health and safety policy and applicable legal requirements. Collaborates with the H&S Specialist and the company's management on issues related to health and safety.

The Project Manager is responsible for the proper and safe execution of the project activities, in addition to his / her responsibilities as a Team Manager.

Specialist, Health and Safety at Work is responsible for the improvement of health and safety conditions at work, performs duties related to the identification of hazards, as well as control over workplaces and monitors compliance with corporate H&S standards. Informs and consults employees about the undertaken measures and hazards. Organizes trainings related to health and safety. Monitors the effectiveness of measures, procedures and control over the health and safety of workplaces in the office and all other functional areas, as well as the relevant subcontractors. Cooperation with management in investigating the causes of accidents at work and occupational diseases.

TBS employees are responsible for performing their tasks in accordance with the company's health and safety policy, procedures, health, and safety instructions. To assist in conducting activities related to health and safety. Report any situation / defective equipment in which they believe there are circumstances in the workplace that pose a risk to them and those around them. Report immediately for accidents / incidents, near miss (a dangerous event that has not caused damage to the body or property but has such potential) and dangerous events. Use all Personal Protective Equipment correctly and according to the instructions.

The Working Conditions Committee (WCC) in the company has the following duties and responsibilities:

- Discuss every quarter, and more often if necessary, the overall activity of ensuring healthy and safe working conditions for employees and proposing measures for improvement.
- Discuss the results of the risk assessment and the analyzes of the health condition of the employees, reports of the specialized service of occupational medicine and other issues related to ensuring health and safety at work.
- Discuss the planned changes in technology, work organization and workplaces and offer solutions to ensure healthy and safe working conditions.
- Monitor the state of occupational injuries and occupational morbidity in the company.
- Participate in the development of programs for informing and training employees on the problems of healthy and safe working conditions.

4. Raising the awareness of employees

Telelink Business Services focuses on the effectiveness of trainings and supports both individual and group development. The goals of this process are to ensure that training activities are related to developing and informing employees about healthy and safe working conditions. As well as that they meet the goals and plans of the company to support business development, increasing its efficiency and allow efficient and flexible use of the company's employees.

The H&S Specialist prepares a Matrix of competencies, which determines the necessary training in health and safety at work for each position in the company, based on the necessary regulatory requirements, other requirements of the company, requirements of customers / clients (if any).

The types of trainings are in accordance with the activities of the company.

H&S trainings for all employees

When new employee is hired in the company, an initial training is conducted by the Health and Safety Specialist in order to get acquainted with the general hazards and risks in the company. The conducted training is documented in a Book for initial training and an Official Note is issued, according to Ordinance № RD-07-2 of December 16, 2009.

After conducting the Initial training, the respective employee is given Training at workplace - introductory training, which acquaints the employees with the specific hazards related to his/her position. The training is carried out before starting work. The training is documented in a Book for workplace training, periodic instruction, extraordinary training.

Additionally, periodic training of the employees is conducted, and the frequency of the training depends on the employees' position. The periodicity is reflected in the Matrix of competencies. The conducted training is documented in a Book for workplace training, periodic instruction, extraordinary training.

Extraordinary training is carried out after each accident, in case of gross violations of the occupational health and safety, in case of change of the technological process, on the prescription of a control body and at the discretion of the Executive Director, or when a task requires specific health and safety related measures.

Extraordinary training is also provided to employees who have been absent from work for more than 45 calendar days.

Specific trainings

The specific trainings on health and safety at work are defined in the Matrix of competencies for each position, as well as the periodicity of their execution according to the legal requirements or necessity.

Training planning

At the end of each calendar year, the H&S Specialist prepares an Annual Plan for training on health and safety at work, which includes the mandatory trainings set in the matrix.

Apart from the trainings set in the Annual Plan, the need for training may also arise in:

- Change in the strategic goals of the company.
- Introduction of new activities or new technologies.
- Change in the applicable regulations.
- Newly emerged / changed H&S risks.
- Corrective actions to eliminate the causes of nonconformities.

5. Requirements for safe work with electrical equipment.

In the company, the employees servicing electrical installations and equipment must have the necessary qualification and legal capacity, as well as their health condition must allow them to perform this activity.

The qualification and the legal capacity are certified by issued valid certificates with the respective qualification group after successfully passing an exam from conducted training.

The qualification group will be acquired, validated, or modified:

- When starting work.
- In case of change of position, related to requirements for another qualification group or the nature of work.
- Upon expiration of the validity period.

The issued certificates are carried by the employees during work with electrical installations and equipment.

6. Documenting information

Each employee needs to perform their duties and responsibilities related to H&S and for this purpose all documentation must be clearly written, accessible and available in an appropriate format.

The process of managing documented information aims to prevent the use of outdated documents and to introduce order and system in the management of documents and records.

All necessary originals of paper documents related to health and safety at work are stored by the Health and Safety Specialist.

The H&S documents are distributed after their approval, and their relevance is controlled by the H&S Specialist.

7. Exchange of information

The exchange of information in Telelink Business Services related to health and safety at work is divided into:

- External exchange of information - communication between TBS and external interested parties.
- Internal exchange of information - communication between the individual structural units and positions in the TBS.

The internal exchange of information related to health and safety at work with employees is carried out through:

- E-mail or internal network.
- Oral provision of information.
- The company's website.

The policy for health and safety at work of the company and all documentation related to health and safety at work are stored on the internal portal of the company, which is accessible to all employees, as well as documents under the H&S on paper are stored in the Human Resources Department by the H&S Specialist.

In addition, internal information materials are used, which are submitted electronically to transmit specific up-to-date information at the moment. The process of exchanging information with external interested parties (customers, suppliers, contractors, partners, government agencies, inspection bodies, the public) on occupational health and safety is carried out at the request or expressed interest of the specific external party. In such cases, the exchange shall be carried out by the Executive Director or other officials appointed by the Executive Director.

All interested parties are provided with access to the Occupational Health and Safety Policy by publishing the policy on the company's website, as well as providing an uncontrolled copy upon request.

8. Management of Opportunities.

Telelink Business Services takes the necessary actions to assess and manage the opportunities for adaptation and organization of work, organization of the working environment and improvement of health and safety at work, as well as to improve the processes of health and safety management in the company.

Once a year or when significant changes occur in the company, a working group is organized, consisting of a Health and Safety Specialist, a representative of the Business Process Management team and external interested parties involved in ensuring safe and healthy working conditions to consider opportunities for improvement for the organization and develop a program with goals for the organization related to employees' health and safety. The company's health and safety management program is available to all employees of the internal portal of Telelink Business Services.

All defined goals are compatible with the company's policies, measurable in a way that their effectiveness can be assessed. All applicable requirements, risk assessment results, feedback and ideas from employees are considered when setting objectives. The status of the goals and the extent to which they have been achieved are monitored on an annual basis.

9. Occupational risk assessment

The risk assessment in Telelink Business Services is performed according to the legal requirements for health and safety at work by identifying the hazards related to work, work process and work environment, as well as making a decision to treat this risk. This aims to reduce occupational injuries and occupational diseases in the company.

The Executive Director issues an order and approve a risk assessment program, which includes:

- the organization and coordination of risk assessment activities.

- the approaches and methods for performing the risk assessment, including ensuring the reliability of the results and developing, if necessary, appropriate methods for the enterprise.
- risk evaluators.
- the necessary resources for risk assessment.
- the ways of providing information, training, and consultations to the evaluators.
- the stages, sequence, and deadlines for risk assessment.
- the manner of consultation with the employees working at or related to the specific assessed place.

The risk assessment includes the following stages:

- classification of work activities.
- identification of hazards in various work activities.
- identification of employees exposed to hazards.
- determining the elements of risk.
- risk assessment.
- documentation.

Re-examining of the risk assessment:

- once a year or in case of changes that may affect the risk - introduction of new production processes, equipment, products and materials, change of labor organization, new buildings and premises, reconstruction of existing ones, etc .;
- after changes in the regulations.
- when the data and information are out of date and have become invalid.
- when it can be improved.
- the applied protective and preventive measures are ineffective or inadequate.
- if necessary, after an accident, an average, occupational diseases and accidents without accidents.

The risk assessment is performed according to a methodology provided by the Office of Occupational Medicine and approved by the Executive Director of TBS. At the discretion of the company's management, another methodology may be used to assess the risk in the workplace.

The Executive Director determines with order the persons to perform the risk assessment and this team assesses the risk at the workplace according to the established methodology, records its results in a Risk Assessment Card and determines the degree of risk.

The employees of the company get acquainted with the risk assessment by certifying that they are acquainted electronically or against a signature in the Protocol / Declaration for acquaintance with the risk assessment.

The risk assessment is maintained as documented information by the H&S Specialist. The H&S Specialist provides free access to the employees of the company, as well as to the control bodies. The information related to the risk assessment, the results and the measures taken are discussed at a meeting of the Health and Safety Working Conditions Committee (HSWCC).

9.1. Health and safety instructions

The H&S instructions are written in an understandable way for the employees. They contain information related to the rights, obligations and responsibilities of the persons who direct or manage the relevant work processes, the qualification or competencies' requirements (only if necessary), the conditions for the safe use of the work equipment or process and other requirements related to the respective work conditions.

The instructions are updated with each change and the date on which they are approved and modified is noted. They are available to all employees on the company's internal portal.

9.2. Inspection and control of working conditions at workplace.

Once a month, visual inspections of workplaces are carried out for complete equipment of the workplace, including an ergonomic chair, monitor, wiring and lighting in the workplace, and when a non-conformity is identified, it is documented in the non-conformity register, corrective actions are taken and take measures to eliminate the danger.

10. Readiness in emergency.

Preparedness and action plans in case of fire or emergency situations in Telelink Business Services include natural, technical, or man-made events that occur during operation.

The Executive Director determines by order persons for actions in emergency situations. The designated personnel are responsible for planning and developing preparedness and response plans.

The company has designated personnel for first aid, who are subject to periodic training to maintain the knowledge and skills to provide assistance in case of accidents and incidents.

Any emergency situation in the company, including an incident, near miss or an accident related to health and safety at work, is entered by the Health and Safety Specialist in the Register of Incidents

10.1. Fire and emergency safety

Fire safety in the company is carried out in accordance with the requirements of Ordinance №8121z-647 of October 1, 2014.

The Executive Director issues orders determining the procedure for ensuring fire safety and the responsible persons who establish an organization, control the observance of the rules and norms for fire safety, as well as control of all portable and non-portable fire extinguishers (for sites with more than 5 fire extinguishers).

The company prepares a Fire Action Plan in accordance with Annex 1 of Ordinance №8121h-647 of October 1, 2014.

Responsible person for fire safety shall create and maintain a fire file containing at least the following documents:

- Fire action plan.

- Evacuation plans in case of fire or accident.
- Protocols from carried out training evacuations.
- Protocols for maintenance and recharging of fire extinguishers, as well as other documents related to the maintenance of Fire alarm System and fire hydrants.

The responsible person for fire safety controls the portable and non-portable fire extinguishers by performing a monthly inspection and reflects the results in the Diary for control of the presence and serviceability of portable and portable fire extinguishers, according to Annex 4 of Ordinance №8121h-647 of October 1, 2014.

11. Accident at work, near miss, emergencies (averages) and established occupational diseases.

Any sudden damage to health that occurred during work or in connection with the performance of work duties, and which caused incapacity for work or death, is considered an occupational accident. Including the cases when the accident occurs during the usual journey on the way to or from the workplace to the employee's home. There is no occupational accident if the victim has intentionally damaged his health.

Telelink Business Services' policy is to report and investigate all incidents, near miss and occupational diseases.

The conditions and the procedure for declaring, establishing, investigating, registering, and reporting of occupational accidents are defined in the Ordinance for establishing, investigating, registering and reporting of occupational accidents.

The Executive Director orders a responsible person to maintain the Register of Incidents at Work and to keep the declarations for accidents at work.

11.1. Incident/accident actions

If there is a victim, witnesses should provide first aid or medical assistance. The victim or witnesses shall immediately notify the direct supervisor of the injured employee, who shall notify the Health and Safety Specialist of the incident. For his/her part, the H&S Specialist notifies the Executive Director of the case. If necessary, the direct supervisor or his/her representative accompanies the victim to a medical facility.

A health and safety specialist should immediately take written testimony from all participants in the event and visit the scene of the incident for inspection and photographs. A health and safety expert organized an investigation into the circumstances surrounding the incident. Representatives of the HSWC Committee are also invited to investigate and establish the causes of the incident. Within 3 working days of learning about the incident at work, H&S specialist organizes the submission of a declaration in the National Social Security Institute (NSSI), when the circumstances under which the incident occurred, give reason to assume that the incident is an incident at work. The declaration is submitted to the NSSI in 4 copies.

The declaration is entered in the Register of occupational accidents of the organization, and the event should be recorded in the Register of Incidents. Based on the results of the investigation

of the incident, H&S Specialist organized an extraordinary training where he/she acquainted all employees with the circumstances of the incident and measures to prevent such incidents.

The H&S Specialist checks the implementation of the defined measures after the expiration of the term for their implementation and evaluates the effectiveness of the corrective measures.

A commission for the investigation of an incident at work, which is determined by an order of the Executive Director, collects information about the incident (site inspection, risk assessment, equipment, and other necessary information materials about the case). If necessary, they interrogate the witnesses, the victim, the direct supervisor. Establish the facts and perform an analysis of the event to establish the causes, as well as proposed measures to eliminate the causes. After finishing of the investigation, the commission shall draw up a report in which the data on the incident, injured persons, violations, and measures taken to prevent such cases shall be included.

12. Determining legal and other requirements

Telelink Business Services defines the procedure and responsibilities for identifying and monitoring changes in the applicable regulatory and other requirements for the company's activities, in addition to the periodic assessment of compliance.

The H&S Specialist identifies the requirements applicable to the activity:

- Legal requirements:
 - Regional, national and European legislation (laws, regulations, rules, regulations, directives, etc.);
 - Permits / Licenses issued to the company.
 - Court decisions
 - Collective labor agreements
- Other requirements - internal requirements of the company, contracts with customers/ suppliers, employment contracts, agreements with parties concerned and others.

Every employee of the company related to "Other requirements" has an obligation to provide a document / information to the Health and Safety Specialist, containing these requirements.

In the Register of the normative requirements, which is accessible for all interested employees on the internal portal of the company, the determined applicable normative and legal requirements are entered by the Health and Safety Specialist.

The H&S Specialist monitors the changes related to health and safety at work, monitoring the changes in the regulations published in the State Newspaper or consulting with an employee of the Legal Department of the company. The occurred changes are considered at the periodical meetings of the HSWC Committee.

The H&S Specialist periodically assesses the compliance with the obligations for observance of the healthy and safe working conditions, accepted by the company. Conformity assessment is performed on the basis of the documented information in the Register of regulatory requirements, requirements of contracts / additional agreements concluded with customers, suppliers, subcontractors and others, as well as from issued permits / licenses of the company.

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