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REGULATORY DOCUMENT

Ulba Metallurgical Plant Joint Stock Company

Approved by:
Executive Board Chairman
/*signature*/ S. Bezhetskiy
September 17, 2025

INSTRUCTION
Procedure for Identifying Hazardous Acts, Hazardous Conditions, Near Miss Incidents and Conducting Behavioral Safety Audits in the Divisions of UMP JSC
RD OH&S No. 14.031-25
(to substitute RD OH&S No. 14.031-24)

Valid until October 01, 2030

Oreder No. 1578 dated September 26, 2025

Developed by:
Production Safety Director
/*signature*/ Y. Chumin
September 17, 2025

Ust-Kamenogorsk

1 Scope

This instruction establishes the procedure for identifying hazardous acts, hazardous conditions, near miss incidents and conducting behavioral safety audits in the divisions of UMP JSC and contractor organizations performing construction and installation work on the territory of UMP JSC, aimed at:
- developing and reinforcing safety culture skills among employees;
- involving employees in the process of timely identification and elimination of hazardous conditions, hazardous acts and near miss incidents;
- preventing and minimizing accidents, incidents and injuries;
- ensuring safety during production processes;
- improving working conditions.

The requirements of this instruction shall be applied by the employees of UMP JSC.

2 Regulatory References

The following reference documents are required for the application of this instruction. The specified revision of the regulatory document shall be used for the dated references, and the latest revision of the referenced document (including any amendments) shall be used for undated references.

ST NAC 5.0.4-2017. System of Industrial Safety Standards. Procedure for Organizing Monitoring and Control of Industrial Safety. Methodological Guidelines;

ST NAC 12.7-19. Procedure for Conducting Behavioral Safety Audit (BSA) at the Enterprises of NAC Kazatomprom JSC. Methodological Guidelines;

ST 14.0018. Occupational Health and Safety Control;

ST 20.0007. Terms and Definitions;

ST 28.0021. Procedure of Relations between UMP JSC and Contractors;

I 14.0019. Regulatory Documents. Publication and Management Procedure.

3 Terms, Definitions, Symbols and Abbreviations

Terms, definitions and abbreviations in accordance with ST 20.0007, and abbreviations in accordance with the Management Structure of UMP JSC are used in this instruction:

3.1 **Auditor**: A person who performs behavioral safety audits (heads of structural divisions who manage work and technological processes, as well as officials who perform production control and technical supervision).

3.2 **Hazardous Act/Event** (HA): Employee behavior that poses a risk of injury to the employee or others, as well as damage to the environment or company property, and constitutes a violation of established rules and regulations. Hazardous act refers to any inaction on the part of an employee that may lead to an accident or injury if not corrected in a timely manner.

3.3 **Hazardous Condition/Event** (HC): A condition/event not directly related to the action or inaction of one or more employees that could lead to an accident or injury, as well as damage to the environment or company property, if not corrected. A hazardous condition may be caused by errors in design, production, or manufacturing, poor maintenance or deterioration. The main difference be-

tween a hazardous condition and a hazardous act is that a hazardous condition is usually beyond the direct control of the employee.

3.4 **Near Miss** (NM): An unintended, unplanned and unexpected event that did not result in injury, illness or damage, but had the potential to cause serious consequences. It may also be an act or condition that, if left unchecked, could result in injury, environmental damage or property damage.

3.5 **Behavioral Security Audit** (BSA): An interactive, documented process that involves systematically conducting audits of personnel performance by managers at all levels, based on the interaction between the auditor and the auditee. The process consists of observing employee behavior while performing work tasks, engaging in motivational and educational conversations between the auditor and the employee, and obtaining feedback.

3.6 **"Occupational Safety Management" Software System** (OSM SS): A network program of UMP JSC used for recording, classifying, processing and analyzing behavioral safety audits (BSA), hazardous acts (HA), hazardous conditions (HC), near miss incidents (NM) identified as a result of inspections on occupational safety and health, industrial and fire safety, radiation and nuclear safety and environmental protection.

3.7 **Industrial Safety**: A management system that includes processes in the areas of occupational safety and health, industrial safety, environmental protection, fire safety, radiation and nuclear safety.

3.8 **Occupational Safety and Environmental Protection Engineer of the Division:** Engineer of the Chief Technical Officer for Occupational Safety and Environmental Protection, Nuclear Safety, Radiation Safety of Uranium Operations / Chief Technical Officer for Occupational Safety and Environmental Protection of Beryllium Operations and Tantalum Operations, and for auxiliary production facilities, the Occupational Safety and Environmental Protection Engineer of the division, including Engineer for Occupational Safety and Environmental Protection, Nuclear Safety and Radiation Safety of Finished Products Storage.

3.9 **OSM SS Inspector:** An employee of UMP JSC who has been appointed as an "Inspector" in the OSM SS.

4 Procedure for Identifying HA, HC and NM

4.1 Procedure for Identifying HA, HC and NM

4.1.1 A documented process that provides for systematic monitoring by any employees of UMP JSC of the condition of workplaces, equipment, and work methods in order to identify and prevent the occurrence (development) of undesirable events, abnormal/emergency situations.

4.1.2 To ensure regular and active participation of all employees of UMP JSC in the process of identifying HA, HC and NM for all divisions of UMP JSC, the Office of the Director for Industrial Safety shall develop and establish a standard for the following year for identifying HA, HC and NM for divisions by December 15 of the current year.

4.2 Identification of HA, HC and NM

4.2.1 HA: When inspecting or passing by the work site or workplaces and noticing, what you consider to be a violation of safety rules (not wearing safety glasses, using defective tools, etc.), approach the employee(s) and suspend work. After that, it is necessary to conduct a conversation in

which you should point out the hazardous action, possible consequences, etc. At the end of the conversation, you should report the HA you have detected to the Industrial and Technical Control Manager or the Engineer for Occupational Safety and Environmental Protection of the division.

4.2.2 HC: If, while inspecting the premises, you notice any HC (malfunctioning equipment, cluttered passageways, spilled liquids, insufficient lighting, etc.), mark or block off the area and notify the Industrial and Technical Control Manager, the immediate supervisor responsible for the area or the Engineer for Occupational Safety and Environmental Protection of the division so that measures can be taken to eliminate the identified HC.

4.2.3 NM: An incident/event that did not result in injury, illness or property damage, but could have done so, and represented a potential danger of serious consequences. If you were involved in or witnessed such an incident/event, report it to your Industrial and Technical Control Manager or the Engineer for Occupational Safety and Environmental Protection of the division.

4.3 Actions of Employees who Witnessed HA, HC or NM

4.3.1 The algorithm of actions for employees who have become participants or witnesses of HA, HC or NM, depending on their position and responsibilities, is specified in Appendix A.

4.4 Recording HA, HC and NM

4.4.1 All identified HA, HC and NM of employees of UMP JSC and contractors shall be recorded in the OSM SS. All registered HA, HC and NM (hereinafter referred to as “comments”) shall be distributed in the OSM SS according to risk level, categories and areas for further analysis and measures to be taken to eliminate them.

4.4.2 Employees of the division who have access to the OSM SS shall submit comments to the OSM SS. The Engineer for Occupational Safety and Environmental Protection of the division, who acts as an Inspector, shall analyze the comments submitted to the OSM SS to determine the causes, categories and areas of their occurrence, and shall register the comments in the OSM SS with a deadline for completion and identification of the persons responsible for addressing the identified comments.

4.4.3 Employees of the division who do not have access to the OSM SS shall submit information on the identified comments to the Industrial and Technical Control Manager / the Engineer for Occupational Safety and Environmental Protection of the division in any way (in person, by telephone, in writing, etc.) for further registration in the OSM SS.

5 Procedure for Conducting BSA

5.1 General Provisions

5.1.1 This instruction establishes the basic requirements for the organization and implementation of BSA aimed at improving the working conditions of employees of UMP JSC and contractors, as well as preventing and eliminating workplace injuries.

5.1.2 The BSA is an element of improving production safety and is aimed at identifying, warning and preventing HA, HC and NM among both UMP JSC employees and the employees of contracting organizations while they are performing their work.

5.1.3 Managers at all levels should be involved in the BSA process. Participation in the BSA should be an indicator of the priority given to safe working conditions, as well as an increase in the role, responsibility and involvement of the above-mentioned employees in the safety management process.

5.1.4 It is recommended that BSA be conducted by a group of at least two auditors, which ensures objectivity, the opportunity to obtain two points of view, the selection of the best topic for discussion, summarizing the results and exchanging opinions, when one auditor observes the work of another auditor.

5.1.5 The regular process of conducting BSA, systematic analysis of BSA results and monitoring the implementation of developed measures are essential contributions to the effective organization of work in the field of occupational safety.

5.2 BSA Objectives

5.2.1 The main purpose of conducting BSA is to systematically monitor working conditions, interact with employees of the division to identify and eliminate HA, HC and NM.

5.2.2 During the BSA process, there is interaction (discussion) with employees of the division or contractor organization, discussing how work should be carried out safely, or what methods and behaviors are unsafe. Auditors should listen to feedback from employees and their suggestions for improvement.

5.2.3 The objectives of conducting BSA:
- immediate identification and correction of HC and HA, including the suspension of work;
- motivation for safe actions and efforts made by employees to create/maintain safe working conditions in the workplace;
- focusing employees' attention on the importance of safety issues, raising employees' awareness of occupational safety issues, encouraging safe behavior and working conditions when performing work tasks;
- identifying the reasons for work being performed in violation of occupational safety requirements (insufficient training, misunderstanding, inattention, issuing work assignments with violations, lack of necessary resources, etc.);
- improving the effectiveness of training in occupational safety;
- identifying weaknesses in the occupational safety management system and identifying dangerous behavior by employees when performing work tasks, which could result in injury to the employee or harm to others;
- not punishment, but improvement of working conditions and increased safety at work.

5.3 Procedure for Planning BSA

5.3.1 BSA is a mandatory addition to existing types of control aimed at complying with the requirements of legislation and internal regulatory documents in the field of industrial safety.

5.3.2 The Office of the Director for Industrial Safety shall develop and establish a standard for the following year for conducting BSA for divisions by December 15 of the current year to ensure regular and active participation of all UMP JSC employees in the BSA process and maximum coverage of all UMP JSC divisions by the audit.

5.3.3 The established standards for conducting BSA shall be approved by the order of UMP JSC.

5.3.4 Orders to appoint auditors shall be issued to conduct the audit in the divisions of UMP JSC (by workshop, department, section, office, division, etc.).

5.3.5 The standards for conducting inspections shall meet the following conditions:
- each division (workshop, department, section, office, division, etc.) shall be covered by audits;
- the BSA shall be conducted during regular working hours and cover all work shifts.

5.3.6 The Engineer for Occupational Safety and Environmental Protection of the division shall oversee compliance with the BSA standards. The Office of the Director for Industrial Safety shall oversee compliance with the BSA standards for the Central Office.

5.3.7 The duration of the BSA may vary depending on the specifics of production, the nature of the work performed and the number of employees at the workplace. The recommended duration of the BSA shall be 10 to 20 minutes.

5.4 Procedure for Organizing BSA

5.4.1 The BSA may be conducted jointly with a representative of the division (department, section), a representative of contracting organizations for the prompt elimination of possible HC, HA, as well as to increase the effectiveness of the process of encouraging safe actions and reinforcing positive behavior of employees in the presence of the Industrial and Technical Control Manager.

5.4.2 The BSA for employees of contracting organizations may be conducted during inspections in accordance with the requirements of ST 28.0021.

5.4.3 Auditors shall use all necessary PPE in accordance with the requirements of the audited object/site. Participation in audits without complying with this requirement shall be considered unacceptable.

5.4.4 It is necessary to focus on occupational safety issues without being distracted by the implementation of the plan and other production issues, demonstrating commitment in all areas of occupational safety by personal example.

5.5 Procedure, Methodology for Conducting BSA and Observation Categories

5.5.1 The BSA process consists of six main stages:
- **observation:** while observing an employee, the auditor analyzes the possibility of them sustaining potential injuries while performing certain actions;
- **safe work interruption:** at this stage, the auditor needs to get the employee’s attention and ask him/her to stop working in order to talk to him/her;
- **beginning the conversation/dialogue:** it is necessary to engage the employee in conversation, avoiding monologues, lectures and comments. The employee’s positive qualities should be acknowledged, and only then should attention be drawn to shortcomings in their actions and possible risks;
- **identifying potential risks:** at this stage, you should get the employee involved in talking about the risks to their life, safety and health, as well as those around them. It’s important to get feedback from the employee;
- **discussion of safe working methods and techniques:** after receiving an answer to the question about the potential risks, ask what the employee needs to do to avoid injury. It is recommended to discuss the employee’s responsibility for their behavior, their safety and the safety of those around them, as well as to agree on safe actions for the future. After the discussion, it is necessary to personally ensure that the hazard has been eliminated;

- **completion of the audit:** it is recommended to discuss additional questions and suggestions for improving the production safety system and to thank the employee.

5.5.2 It is recommended that discussions on safe and unsafe employee actions be conducted using the following methodology:

5.5.2.1 If an employee performs HA:
- ensure that you are not at risk and that interrupting the work will not lead to more serious outcomes, safely interrupt the work, and initiate a conversation;
- in cases where the action directly threatens human health and life, immediately stop work;
- begin the discussion with a positive observation to establish rapport;
- comment on safe behavior. Recognize the efforts the employee has made to comply with safety requirements. Report the audit. Emphasize that the purpose of the BSA is not punishment, but rather improving working conditions and enhancing occupational safety;
- discuss the employee's HA, ask only open-ended questions, for example:
- Tell us about your job.
- What could cause harm (hazardous factors)?
- What kind of injury could you have sustained?
- How could this injury affect your life outside of work?
- Who else could have been affected?
- What damage could be caused to the asset?
- How can you avoid an accident and prevent potential damage?
- What emergency situations could potentially occur at this site? What action would you take if this happened?
- What prevents you from working safely in compliance with the requirements?
- obtain the employee's agreement to work safely in the future;
- thank the employee for listening to you and correcting his/her behavior;
- during repeated BSA with the same employee, try to assess whether previously reached agreements are being fulfilled.

5.5.2.2 If an employee works safely:
- observe for a while, then initiate a conversation;
- comment on their safe behavior. Recognize the efforts the employee has made to comply with safety requirements;
- discuss other safety issues (training, briefings, meetings, pre-work briefings, information about incidents, deficiencies in the current or need for different PPE or tools, changes in operations, what is happening in other areas where injuries can occur);
- thank the employee.

5.5.3 When conducting BSA, the following observation categories should be used. These observation categories will help the auditor focus on what needs to be learned during the BSA and formulate questions to ask the audited employees.

5.5.4 In turn, the employee should:
- adjust or properly wear the required PPE;
- change position;
- modify the work method;
- stop the work;
- move away from the hazard or take cover;
- replace the tool;
- connect or install the necessary protective devices or guards.

5.5.5 Potential causes of injury:
- Is anyone putting themselves or others at risk of injury?
- Are work techniques appropriate and safe?
- Is anyone in an unsafe position that could result in a fall, collision, impact or entrapment?
- Is there a risk of inhalation or ingestion of hazardous substances?
- Is there a risk of electric shock?

5.5.6 Protective clothing and PPE:
- Are the protective clothing and PPE appropriate for the tasks being performed?
- Is the required PPE available for this type of work?
- Is the employee using the required PPE correctly (if not, why)?
- Is the PPE uncomfortable or interfering with the performance of the work?

5.5.7 Condition of tools and equipment:
- Is the equipment in safe and serviceable condition?
- Is the equipment being used in accordance with operating procedures and for its intended purpose?
- Are any homemade or improvised tools or devices being used?

5.5.8 Procedures and rules:
- Are the relevant procedures and other regulatory documents available to management?
- Are the rules and procedures appropriate for the work being performed?
- Have all potential hazards, risks and control measures been identified and documented?
- Are the established rules and procedural requirements being followed?
- Are work permits and authorizations for hazardous work properly issued and completed?

5.5.9 Workplace housekeeping:
- Is the workplace maintained in a condition suitable for safe work?
- Are tools, materials and equipment properly organized and stored?
- Are access roads and walkways free from obstruction and clutter? Are unused tools and equipment removed?
- Are stairways and platforms free of obstacles?

5.5.10 Auditors shall not ignore any HC or HA that arise. They are required to immediately stop work until the HC and HA of employees are eliminated.

5.5.11 If it is not possible to take corrections immediately, corrective actions shall be reflected in the registration of the BSA, indicating the deadlines and those responsible for their implementation in order to prevent the recurrence of HC and HA.

5.6 BSA Results

5.6.1 The auditor (audit team) shall register the conducted BSA in the OSM SS.

5.6.1.1 The following information shall be reflected in the registered BSA:
- date of the audit, full names of the auditors, site (facility) where the audit is conducted;
- number of employees observed during the audit;
- total duration of BSA time;
- number of observed HC and HA;
- immediate and long-term corrective actions with specified deadlines and those responsible for correction.

5.6.2 Based on the results of the conducted and registered BSAs, the following reports are generated in the OSM SS: “BSA”, “BSA by Category” and “BSA by Auditor”. An analysis of the conducted BSA is carried out based on the results of the reports. The analysis of the BSA is necessary to identify the frequency of HC and HA occurring in specific areas or related to specific types of work.

5.6.3 The analysis should categorize and classify all identified HCs and HAs, immediate corrective actions taken by the auditor (audit team), and suggestions for preventing their recurrence, as well as highlight positive observations. These suggestions should be based on the findings of employee interviews and should be aimed at identifying deficiencies rather than penalizing individual employees.

5.6.4 Based on the results of the analysis of the registered BSA in the OSM SS, the head of the division (workshop, department, section, office, division, etc.) in which the BSA was carried out shall determine the measures aimed at eliminating the HC and HA identified in the BSA process, the deadlines for implementation and the responsible persons.

5.6.5 The head of the division (workshop, department, section, office, division, etc.) and auditors, based on the information in the OSM SS, shall check the implementation of planned activities within the established timeframes.

5.6.6. The heads of the division (workshop, department, section, office, division, etc.) should regularly discuss the results of the BSA analysis and decide what changes should be made to the industrial safety management system.

6 Analysis and Reporting

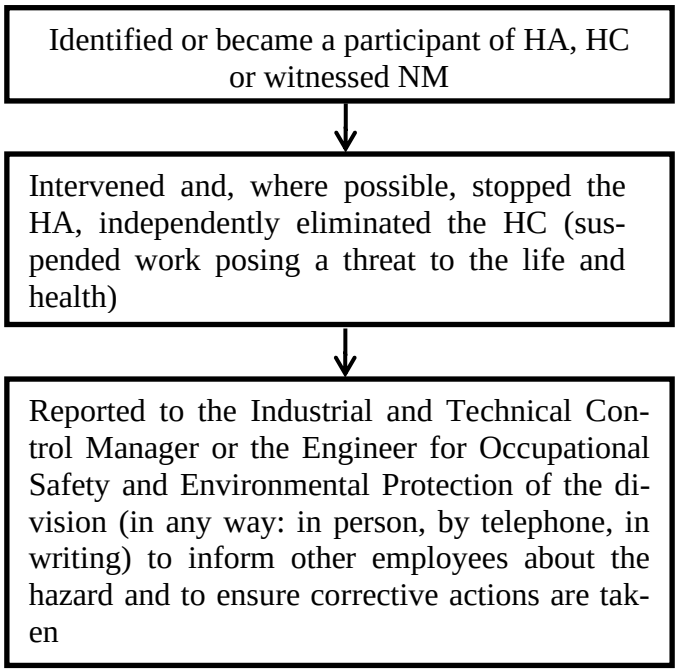
6.1 Occupational Safety and Environmental Protection Engineer of the division shall monitor compliance with standards for identifying HC, HA, NM and conduct BSA within his/her division. Engineer shall also prepare quarterly reports (Appendix B) and submit them to the Office of the Director for Industrial Safety. The Office of the Director for Industrial Safety shall oversee compliance with the standards for the Central Office.

6.2 Occupational Safety and Environmental Protection Engineers of the division shall prepare an analysis quarterly (see paragraph 4.4.1 and paragraph 5.6.4) by causes, categories, areas and by recurring violations. The Analysis shall be prepared using the presentation form “Template for Analysis of HC, HA, NM and BSA in the OSM SS” located on the internal corporate portal, in the Office of the Director for Industrial Safety tab (Documents-Form (Template)). The completed Analysis shall be sent to the Office of the Director for Industrial Safety.

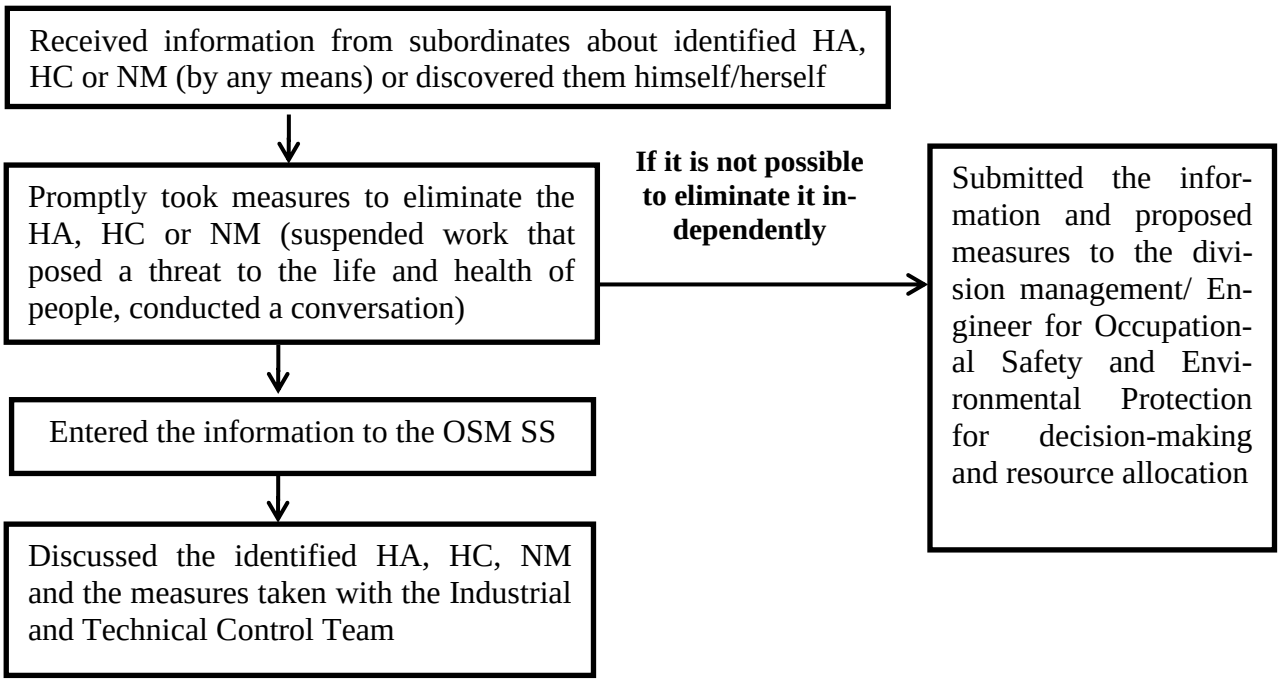
6.3 Quarterly reports and presentations based on the analysis results prepared by the Occupational Safety and Environmental Protection Engineers of the division shall be reviewed in the divisions during Occupational Safety Days.

Appendix A
(informative)

Algorithm of Actions for an Employee Who Has Become a Participant or Witness of HA, HC or NM

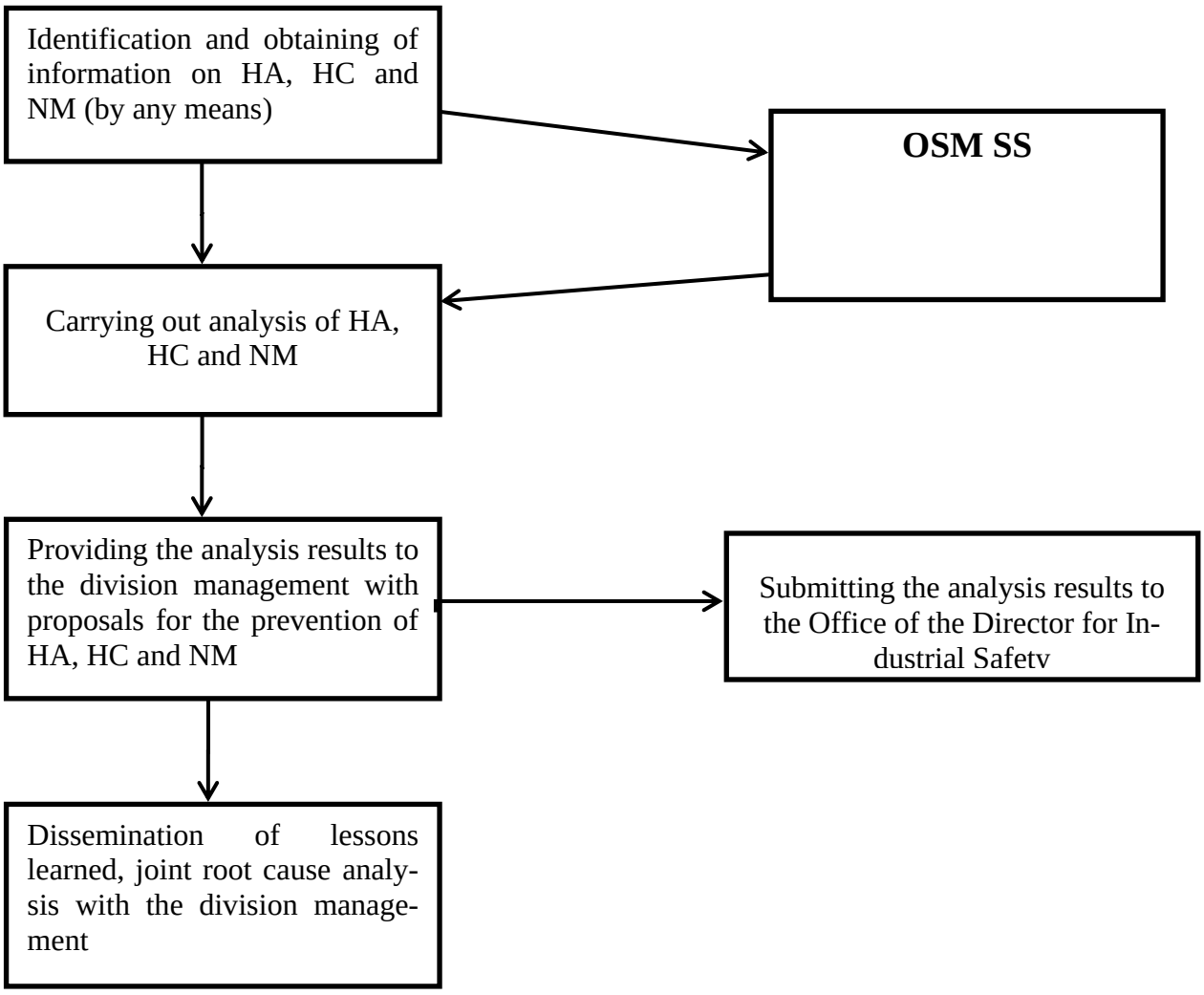


Algorithm of Actions for the Industrial and Technical Control Manager



Continuation of Appendix A

Algorithm of Actions for the Engineer for Occupational Safety and Environmental Protection of the Division



Appendix B
(mandatory)

_____No. _____

Form of the Report on the Implementation of Standards in the OSM SS for the ___ Quarter of 20__ *

Position	HC, HA, NM		BSA		Reason for Deviation
	Plan	Actual	Plan	Actual	

***- the report shall be prepared on the division's letterhead**