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REGULATORY DOCUMENT

Ulba Metallurgical Plant Joint Stock Company

Approved by:
Executive Board Chairman
/signature/ S. Bezhetskiy
July 15, 2025

Instruction
Procedure for the Implementation of the “STOP-Card” Unsafe Work Stoppage System at
UMP JSC

RD OH&S No. 14.034-25
(to substitute RD OH&S No. 14.034-20)

Valid until August 01, 2030
Order No. 1215 dated July 18, 2025

Developed by:
Production Safety Director
/signature/ Y. Chumin
July 15, 2025

Ust-Kamenogorsk

1 Scope

This instruction establishes the process for applying the STOP-Card procedure for suspending/stopping unsafe work by employees at UMP JSC (hereinafter referred to as the “Procedure”) and defines the process for suspending/stopping unsafe work by employees.

This Procedure has been developed to comply with the requirements of the legislation of the Republic of Kazakhstan in the field of Occupational Health and Safety, Industrial Safety, Radiation Safety and Environmental Protection, and is aimed at preventing accidents, occupational diseases, emergencies, developing a culture of safety in the workplace and increasing the awareness and personal responsibility of each employee for creating and maintaining safe working conditions.

This instruction shall apply to all employees of UMP JSC and shall be implemented in the main and auxiliary production departments of the Industrial and Manufacturing Complex and the Central Administration.

The requirements specified in this instruction shall be complied with in conjunction with the requirements of other regulatory documents in force at UMP JSC and shall not replace the safety requirements specified in those documents.

2 Regulatory References

The following reference documents are required for the application of this instruction. The latest edition of the reference document (including all its amendments) shall apply for undated references.

ST 20.0007. Terms and Definitions.

I 14.0019. Regulatory Documents. Publication and Management Procedure.

RD OH&S No. 14.024. Procedure for Organizing and Safely Performing Hazardous Operations at UMP JSC.

RD OH&S No. 14.031. Procedure for Identifying Hazardous Acts, Hazardous Conditions, Near Miss Incidents and Conducting Behavioral Safety Audits in the Divisions of UMP JSC.

3 Terms, Definitions, Symbols and Abbreviations

Hazardous factor: A potential source of harm or condition that could cause injury to a person or damage to property (equipment).

Procedure: Procedure for employees to suspend/stop unsafe work (STOP-Card).

STOP-Card: It defines the procedure for employees to suspend/stop unsafe work.

4 General Provisions

4.1 This instruction has been developed in accordance with the requirements of the Labor Code of the Republic of Kazakhstan.

4.2 In accordance with Article 181 of the Labor Code of the Republic of Kazakhstan, every employee shall have the right to:

- a workplace equipped in accordance with Occupational Health and Safety requirements;
- be provided with sanitary and domestic facilities, means of individual and collective protection in accordance with the requirements of Occupational Health and Safety;
- refuse to perform work in the event of the employer's failure to provide the employee with personal and/or collective protective equipment and in the event of a situation that poses a threat to their health or life, with written notification of this to the immediate supervisor or employer;
- receive accurate information from their employer about the characteristics of their workplace and the organization's premises, the state of Occupational Health and Safety conditions, existing occupational risks and measures to protect them from exposure to hazardous substances.

4.3 Each employee shall have the legal right to suspend/stop unsafe work if hazardous conditions or unsafe actions that do not comply with occupational safety requirements are present.

The right to stop work is a process that empowers every worker/employee to stop work as soon as they notice a situation that they believe to be unsafe.

4.4 Circumstances requiring the suspension/stoppage of work are threats of:

- an accident at work;
- occupational disease;
- an accident or incident;
- traffic accident;
- fire;
- environmental pollution;
- other.

4.5 An employee/staff member shall have the right to suspend/stop work if:

- their life and/or the lives of those around them are in danger;
- continuing work may lead to an accident, incident or injury;
- work is being carried out in violation of safety requirements;
- safe conditions for performing the work (organizational and technical) have not been provided;
- the employer has not provided training, instruction, or testing of the employee's knowledge on Occupational Health and Safety issues;
- other.

5 Procedure for Suspending/Stopping Unsafe Work

5.1 Upon identifying circumstances requiring the suspension/stoppage of work, the employee shall immediately report this to his/her supervisor and to the specialist 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. If the work is performed under a work permit, this shall be reported to the supervisor/work manager.

5.2 The manager, after becoming aware of the existence of circumstances requiring the suspension/stoppage of work, shall be obliged to suspend the work until the causes of their occurrence are eliminated, notifying the management of the division (site, office, workshop) where the work is being carried out.

5.3 Once the right to suspend/stop work has been applied, the following steps shall be taken:

- work shall be stopped immediately;

- the reason for the suspension/stop shall be explained (recommendations for improving safety, violation of rules and regulations, other reasons);
- a safety analysis of the work being performed shall be carried out in order to identify and determine, if necessary, additional control measures to reduce risks.

5.4 After suspending/stopping work, the STOP-Card shall be registered in the Occupational Safety Management Software System (OSM SS), in which the responsible executor shall describe the situation posing a threat to the life and health of employees and indicate the reason for suspending work.

5.5 The STOP-Card shall be completed in the “Comment Registration” section for further analysis and action to eliminate the causes, in accordance with the requirements of RD OH&S No. 14.031.

5.6 Such a suspension/stop of work may be simply a pause necessary to show the worker a certain safe method of performing the work, but it may also represent a delay in execution or even the cancellation of the work if factors are discovered that cannot be eliminated. In this case, the head of the division shall take a firm stance, supporting employees in cases where it is necessary to interrupt work.

5.7 An employee’s refusal to perform work in the event of a danger to his/her life and health due to a violation of Occupational Health and Safety requirements, or to perform work in harmful and/or hazardous working conditions not provided for in the employment contract, shall not entail disciplinary liability.

5.8 The specialists 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 shall ensure that each case of suspension/stoppage of unsafe work is recorded and immediately respond to them.

5.9 Resumption of work shall be permitted if the reasons (circumstances) that led to the suspension/stoppage of work have been eliminated.

5.10 If an employee is unsure whether the suspension/stoppage of his/her work is legal, he/she shall contact his/her immediate supervisor and the specialist 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, explain the situation and make a decision together with the responsible individuals.

5.11 Suspension/stoppage of work is a preventive safety tool; therefore, the employee who has been stopped is recommended to undergo Behavioral Safety Audit (BSA) and re-familiarization with the OSH Instructions and Technological Regulations (if required).