

# Occupational Health and Safety Policy

Noval Property R.E.I.C. is committed to provide a safe workplace and continuously promote Health and Safety for employees, partners, and any person/organization working under the company's control, as well as other stakeholders, including customers, suppliers, contractors, subcontractors, and visitors. The policy has been developed taking into consideration the interests of key stakeholders of Noval Property R.E.I.C. The policy applies to Noval Property R.E.I.C.'s own operations regardless of the country in which it operates. The Company's ultimate goal is "No accidents, no occupational illnesses."

This policy is developed to address Health and Safety related material negative impacts such as the unsafe conditions resulting in occupational accidents/illnesses. The policy incorporates Health and Safety risks, such as potential legal liabilities and reputational damage.

To achieve this, Noval Property R.E.I.C. must adhere to the following commitments:

## 1. Risk prevention culture

- Foster a culture where all injuries and work-related illnesses can and must be prevented.
- Fully integrate Occupational Health and Safety into the Company's overall environmental, social, and governance (ESG) strategy, ensuring transparent disclosure of OHS risks and performance.

## 2. Compliance with regulations and standards

- Noval Property R.E.I.C. must comply with this OHS policy, as well as national laws and regulations. Where a discrepancy exists, the most stringent requirement shall apply. Noval Property R.E.I.C. abides with internationally recognized Health and Safety frameworks, such as the OECD Guidelines for Multinational Enterprises and International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

## 3. Health and safety risk management

- Adopt a comprehensive risk assessment framework, ensuring that all significant risks to health and safety are reported and mitigated appropriately.

## 4. Incident reporting and investigation

- Report, investigate, and disclose all incidents (accidents, near misses, and unsafe conditions). Health and safety data and key performance indicators (KPIs) must be disclosed internally and externally to enhance transparency.
- Implement corrective and preventive measures promptly, ensuring that incident investigations contribute to continuous improvement efforts.

## 5. Stakeholder engagement and communication

- Engage transparently with all stakeholders regarding Health and Safety issues, performance data, and corrective measures.

## 6. Employee participation and training

- Recognize that behaviors play a critical role in promoting a safe workplace. Provide continuous Health and Safety training programs, fostering skill development and knowledge-sharing.

- Encourage active consultation and participation of employees and their representatives in Health and Safety decision-making processes, with specific attention given to vulnerable groups.

#### **7. Workplace Health and Safety**

- Provide safe and healthy working conditions, including adequate facilities, tools, and protective measures, to minimize occupational injuries and illnesses.
- Promote mental health awareness and ensure that employees have access to support for mental well-being. This includes addressing psychosocial risks and promoting a supportive work environment.
- Ensure that both physical and mental well-being are protected, taking into consideration the diverse needs of employees, including gender-specific health considerations.

#### **8. Continuous improvement and monitoring**

- Continuously improve OHS performance through engagement with employees and contractors.
- Embed OHS performance into the Company's overall sustainability reporting and governance structures, ensuring a proactive approach to risk management and health promotion.

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#### **Governance and Accountability**

Noval Property R.E.I.C. will establish governance mechanisms to monitor, assess and manage Health and Safety impacts and risks.

Responsibility for the implementation of this policy lies with the most senior executive at the Company. Clear internal governance structures must be established, including OHS performance monitoring, to ensure oversight from the board level to operational management.

Noval Property R.E.I.C. is responsible for reporting on OHS performance through the Company's sustainability reports. These reports must include both qualitative and quantitative data to ensure transparency and accountability.

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#### **Distribution and Communication**

It falls into the responsibilities of Noval Property R.E.I.C.'s management to communicate the content and the spirit of this document to all personnel, direct and associated, also to stakeholders. This policy is published and posted on the Company's intranet network and website.

The policy will be reviewed annually to ensure compliance with all applicable laws and regulations and any other relevant updates.