

## **AFI DEVELOPMENT – OCCUPATIONAL HEALTH AND SAFETY POLICY**

AFI Development PLC (together with its subsidiaries – “AFI Development” or the “Company”) is committed to maintaining a high level of occupational health and safety and accepts it as a key aspect of responsible operations.

The Company is committed to providing a safe environment at all its properties including commercial projects – offices, shopping centers and hotels, as well as residential projects, mixed-use properties and other development schemes. Our policy on occupational health and safety (thereafter, the “Policy”) is developed for the benefit of all our employees, workers, contractors and visitors – those parties affected by our activities.

### **Our approach**

Our commitment to Health and Safety includes the recognition of the principles as set forth in the following national laws and international standards:

- Constitution of the Russian Federation;
- Labor Code of the Russian Federation;
- Russian Federal Law "On the Fundamentals of Occupational Safety in the Russian Federation";
- Russian Federal Law "On compulsory social insurance against accidents at work and occupational diseases";
- Constitution of the Republic of Cyprus; and
- Health and Safety Law of the Republic of Cyprus, to the extent that they are applicable on our operations.

### **Principles**

We strive to minimise Health and Safety risks of all workers, contractors and visitors, and anyone else who may be affected by our business operations.

In our daily activities and business operations, AFI Development:

- seeks to ensure safety of all our employees;
- promotes healthy workplaces;
- is committed to preventing workplace injuries and illnesses;
- tolerates zero accident rate;
- minimises the risk of harm to people, property and environment;
- manages any unforeseen events to limit any adverse effects; and
- aims to ensure all work related activities are done safely.

### **Delivery and implementation**

The Policy is embedded into every aspect of Company’s business activities and is an integral part of our sustainability approach, with the following actions being prioritised:

- Comply with all applicable laws, regulations and standards on Health and Safety;
- Make this Policy readily available to all employees, workers and contractors;
- Ensure employees, workers and contractors have adequate resources, information and training required to competently and safely perform their work;
- Provide workers present on construction sites with special clothes and personal protection equipment;

- Provide direction and supervision to ensure that all employees understand the required behaviors and the consequences of non-compliance;
- Provide instruction to all workers on how to report all accidents and incidents on the job immediately, no matter how trivial;
- Record and investigate work-related incidents and implement corrective and preventive actions;
- Take account of Health and Safety concerns through involving and consulting with employees, workers, contractors, government authorities and shareholders;
- Demonstrate clear top management commitment, accountability and leadership for the effectiveness of the present Policy;
- Review the Policy annually and update if necessary; and
- Seek continual improvement of our Health and Safety performance.

Documented details and specific safe procedures are contained in Health and Safety manual, held at the main office and at each construction site under AFI Development's or its subsidiaries' supervision; this manual is freely available to all employees, workers and contractors.

Successful implementation of this Policy requires total commitment from all employees. Each individual has an obligation to take reasonable care for his or her own health and safety and for the safety of other people who may be affected by his or her acts or omissions.

The Company recognises the value of proactively managing its Health and Safety responsibilities, and as such allocates the appropriate level of resource and expertise to manage them effectively. The Board of Directors is fully committed to ensuring the Health and Safety of all employees and of all those affected by its activities as far as reasonably practicable.

## **CONTACTS**

We welcome queries from our stakeholders. Questions regarding the content and application of the present Policy can be forwarded to our specialists in any convenient form, including telephone and e-mail queries. Contact information may be found on the AFI Development company website.

With respect to incidents of violation of the present Policy or suspicion of such cases, please contact the Health and Safety Manager of AFI RUS LLC (Tatiana Sapozhkova) and/or Chairman of the Audit Committee (David Tahan).

This Policy statement and is endorsed by Health and Safety Management, as well as by Managers of construction sites.

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Approved by the Board on 25 June 2018.