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AGROS PTE. LTD.
www.agrosglobal.com
36 Robinson Rd, 068877 Singapore

Occupational Health & Safety (OHS) Policy

Applicable period: Until further update

Last updated: July 2026

Version: V.2

Lead department: Finance & HR

Other departments involved: Product & Engineering (technical safety standards, EPC/Business Partner pre-qualification); Supply Chain & Operations (warehouse, fleet, drivers); Commercial (field sales safety)

Process objective: This policy establishes Agros' commitment to providing a safe and healthy working environment for all stakeholders, including direct employees, contracted workers, consultants, interns, and visitors. It serves as the central guideline, linking with existing corporate policies and country-specific Standard Operating Procedures (SOPs).

Review frequency: Annual, at group level (see 1.6 Monitoring & Review)

Process description:

1.1 Scope

This policy applies to:

- All employees and contracted workers across Agros operations.
- All central team members, subsidiaries, and field offices.
- All activities conducted under Agros' control, whether on-site, during travel, or in remote working conditions.

1.2 Principles

Agros commits to:

- Preventive Care: Identifying, assessing, and mitigating risks to health, safety, and well-being.
- Compliance: Ensuring adherence to all applicable laws, international standards, and country-specific regulations.

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- Integration: Aligning health and safety with business processes, HR policies, and operational SOPs.
- Continuous Improvement: Regular training, monitoring, and feedback mechanisms.

1.3 Linkages to Other Policies

- Employee Handbook - Code of conduct, general rights and responsibilities, provided in each local language.
- Non-Discrimination Policy - Equal treatment in all health & safety considerations.
- Grievance Policy - Reporting unsafe conditions without fear of retaliation.
- Whistleblowing Policy - Confidential channels for reporting violations.
- Recruitment, Onboarding & Offboarding Processes - Introduction and closure of health & safety responsibilities.
- Relocation Policy - Emergency relocation provisions in case of disaster or severe risk.
- Country-Specific SOPs - Annual leave, business travel, compensation, and remote work, adjusted for local compliance.
- GLOBAL Repayment and Credit Management Guidelines 2025 - Mandatory standards for employees handling cash or customer repayments.

1.4 Key Commitments

i. Safe Work Environment

- Maintain workplaces free from known hazards.
- Provide appropriate Personal Protective Equipment (PPE) where required.
- Conduct regular safety audits and risk assessments.

ii. Health & Safety Training

- Onboarding Training: Introduction to Agros OHS standards.
- Annual Refresher Training: Updates on SOPs, emergency procedures, and new risks.
- Specialized Training: For sales/field staff (heat waves, field hazards, equipment safety).
- Cross-Training: Regular staff cross-training to reduce fatigue, enhance skills, and prepare employees for flexible deployment.

iii. Emergency Preparedness & Natural Disasters

- Maintain emergency evacuation procedures for all offices and project sites.

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- Conduct quarterly drills (fire, earthquake, flood, etc.) tailored to local risks.
- During earthquakes/natural disasters: employees will be offered relocation support under the Relocation Policy, deployment to the nearest operational hub with an available role, and temporary housing/logistical assistance.

iv. Business Travel & Remote Work

- Business trips must follow country-specific SOPs, including risk assessments.
- Remote workers are provided with ergonomic guidelines and safe home-office practices.

v. Well-Being & Mental Health

- Access to support through grievance procedures and confidential reporting.
- Regular awareness programs on stress management, work-life balance, and available leave entitlements.

1.5 Responsibilities

- Management: Ensure compliance, allocate resources, and demonstrate leadership commitment.
- Supervisors: Enforce safety practices, monitor conditions, and report hazards.
- Employees & Contractors: Follow OHS procedures, participate in trainings, and immediately report unsafe conditions.
- Employees who handle cash from customers: Responsible for complying with the Global Repayment & Credit Management Guidelines.
- HR & Central Team: Maintain updated SOPs, ensure policy alignment, and oversee relocation/rotation (if any) programs.

1.6 Monitoring & Review

- Annual review of the OHS Policy at group level.
- Quarterly Compliance Reports from Country Directors to COO.
- Key Risk Indicators (KRIs): e.g., deposit delays, number of incident reports, number of near misses.
- Corrective actions must be closed within 30 days.
- Continuous feedback loop through grievance and whistleblowing channels.

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1.7 Incident Reporting Procedure

Objective: to ensure all workplace incidents (injuries, illnesses, near misses, and property/equipment damage) are reported promptly, investigated, and closed with corrective action.

a. Reporting Line

- Any employee, contractor, or consultant who experiences or witnesses a workplace incident must report it immediately, and no later than the same working day, to their direct manager/supervisor.
- If the direct manager does not acknowledge the report within 24 hours, the report must be escalated to HR (Country HR Lead or Central HR Team).
- Fatal or serious incidents (hospitalization, permanent disability, multiple casualties) must be reported to HR and the Central Team immediately and in parallel with the direct-manager notification, regardless of the 24-hour window above.
- For the purposes of this Section, occupational illness includes any illness, disease, or medical condition reasonably linked to workplace exposure or work activities, including but not limited to heat illness, metal fume fever, chemical exposure, and repetitive-strain injuries.
- Employees may instead report through the Grievance Policy or Whistleblowing Policy channels where they prefer not to report to their direct manager (e.g., if the manager is implicated). No employee, contractor, consultant, or Business Partner worker will face retaliation for reporting a workplace incident in good faith.

b. Reporting Timeframe In addition to the immediate verbal notification required under 1.7(a), a written incident report on the standard Incident Report Form must be submitted within the following maximum timeframes:

- i. Fatal or serious incidents, including death, hospitalization, permanent disability, multiple casualties, or any injury preventing a worker from performing normal duties for 48 hours or more: within 24 hours of the incident.
- ii. All other incidents, including minor injuries, near-misses, dangerous occurrences, and property or equipment damage: within 48 hours (2 x 24 hours) of the incident.
- iii. Occupational illness: within 48 hours of diagnosis by a qualified medical practitioner, not from first exposure.
- iv. Where a worker's condition is subsequently certified as recovered, disabled, or fatal, a follow-up report must be submitted within 48 hours of that medical certificate to support statutory social-security reporting requirements.

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These are internal maximum reporting periods and do not replace statutory reporting obligations. Where local legislation requires a shorter reporting period, the statutory requirement prevails. Incident reports contain personal and health data and must be handled in accordance with the Agros Data Protection Policy and applicable privacy regulations.

c. Investigation & Corrective Action

- HR, together with the relevant Supervisor/Country Manager, investigates the incident, including root-cause analysis, within 7 calendar days of the report.
- A Corrective and Preventive Action (CAPA) plan must be assigned an owner and due date, and closed within 30 days of the incident being reported, consistent with the commitment under Section 1.6.
- All incidents, investigations, and CAPA status are logged in the incident register and included in Quarterly Compliance Reports from Country Directors to the COO, and reflected in the KRIs tracked under Section 1.6.

1.8 EPC / Business Partner Contractor Safety

Scope: this section applies wherever installation, commissioning, or field service of Agros solar pump systems is carried out by a third party, including EPC (Engineering-Procurement-Construction) contractors, well drillers, MEP contractors, and other parties operating under the Business Partner Agros (BPA) program, rather than by Agros' own field staff.

a. Two Installation Postures

- Partner-executed installation (e.g., BASIC package): the Business Partner supplies and installs the system independently, with no Agros crew on site. Agros' direct line-of-sight to site safety is limited; safety assurance instead runs through the Partnership Agreement and pre-qualification (see (b)).
- Agros-supported installation (e.g., FULL package, or any project with an Agros technician present): Agros' existing OHS Policy (Sections 1.1-1.7) applies directly to any Agros employee or contracted worker on site, in addition to the requirements below.

b. Pre-Qualification & Contractual Safety Requirements

- Before a contractor or well driller is onboarded as a Business Partner, the Head of Product & Engineering (or delegate) confirms the partner has: (i) certified technical personnel for electrical and pump installation work, and (ii) a basic safety induction process for their own crews.
- The Partnership Agreement must include a clause requiring the Business Partner to comply with applicable local OHS law for its own workers and to indemnify Agros for

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injuries arising from the partner's installation work, consistent with the partner being an independent contractor rather than an Agros-directed crew.

- Before onboarding, and again at each contract renewal or any material change in scope of work, the Business Partner must provide the Head of Product & Engineering (or delegate) with a written attestation that its crews meet the requirements of the Agros Field Safety Standard (current version) and that it maintains evidence of the competency, certification, equipment-inspection records, and training required by that standard. The Agros Field Safety Standard is maintained as a separate controlled annex and may be updated without amendment to this Policy; the version in force at the date of attestation applies.
- The Business Partner must hold and evidence to Agros before mobilization and at each renewal thereafter: (i) registration of deployed workers with the applicable national work-injury and death insurance/social-security scheme; (ii) employer's liability or workmen's compensation cover above statutory minimum requirements where available; (iii) public and third-party liability cover; and (iv) where the Partner performs installation works, Contractors All Risks (CAR) or Erection All Risks (EAR) cover for not less than 100% of the contract value.

c. Installation Quality & Safety Standard

- Every installation performed by a Business Partner must follow the current Agros installation and documentation checklist (handover checklist), which captures system data and photographic evidence of key installation steps, and forms the basis for warranty activation.
- The Field Application Engineer (FAE) or Head of Product & Engineering reviews a sample of partner-executed installations for quality and safety compliance, at a frequency set by Engineering.

d. Incident Reporting; Extension to Contractor Crews

- Any injury or serious near-miss involving a Business Partner's crew during installation or service of an Agros system must be reported by the partner to Agros (Field Application Engineer or National B2B2G KAM) within 2 x 24 hours, using the same Incident Report Form referenced in Section 1.7.
- This reporting obligation applies regardless of who is contractually responsible for the injured worker's own OHS compliance; Agros tracks it as a KRI (Section 1.6) because it occurs on an Agros-branded installation.
- Agros' internal 2 x 24-hour timeline does not override, and is not a substitute for, the Business Partner's own statutory reporting obligations to local authorities for its own employees.

e. Ownership

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- Head of Product & Engineering: owns pre-qualification criteria and installation-quality review.
- Commercial (National B2B2G KAM / Senior B2B2G): ensures the safety clause is included in every Partnership Agreement before signing; escalates any partner non-compliance.
- HRGA Manager: maintains the contractor incident log as part of the broader OHS KRI reporting under Section 1.6.

1.9 Risk Assessment & Training Program

a. Risk Assessment Methodology

- Every project site and role is screened using the E&S Risk Register (Annex B of the Agros E&S Guideline), which identifies hazards, rates them by likelihood x severity, records existing controls, and assigns a corrective action with an owner and due date.
- Risk assessments are triggered at three points: (i) before operating in a new site or market, (ii) whenever new equipment or installation methods are introduced (e.g., larger-capacity pumps up to 15HP), and (iii) after any reportable incident, as part of the root-cause review under Section 1.7(c).
- The Risk Register is reviewed at minimum annually by the Central Team, alongside the annual OHS Policy review (Section 1.6).

b. Training Program

- Training is delivered by role according to the Training Matrix (Annex J of the E&S Guideline), covering Installers, Field Technicians, Drivers, Warehouse staff, and Managers, each with a defined initial training duration, refresher cadence, and evidence requirement (certificates, rosters, attendance logs).
- Training content is updated whenever this Policy changes materially. Following the introduction of Sections 1.7 (Incident Reporting) and 1.8 (EPC/Business Partner Contractor Safety), all affected roles must receive a rights-and-responsibilities briefing on the updated procedures; see the accompanying OHS Policy Training Rollout Plan for the specific schedule and materials.
- Business Partner/EPC crews are covered under Section 1.8(b)-(c) pre-qualification and installation-quality review, rather than under this internal Training Matrix, since they are not Agros-directed staff.

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1.10 Acknowledgement

All employees, contractors, and consultants must acknowledge this OHS Policy as part of onboarding and annual training.

1.11 Country-Specific OHS Compliance

Agros commits to meeting or exceeding the Occupational Health & Safety requirements as regulated by each country of operation. The Central Team coordinates with Country Managers to ensure compliance, documentation, and audits are properly managed.

Indonesia

- Regulation Reference: Occupational Safety and Health Law (UU No. 1 of 1970) and Manpower Law No. 13 of 2003.
- Government Audits: Annual OHS audits (SMK3 - Sistem Manajemen Keselamatan dan Kesehatan Kerja).
- Employer Requirements: Appoint certified OHS experts (Ahli K3), conduct workplace risk assessments, maintain regular health checks, and submit annual compliance reports.
- Statutory incident reporting: workplace accidents must be reported to the relevant authorities within 2 x 24 hours (48 hours), including reporting obligations to the local Manpower Office (Disnaker) and applicable social-security authorities, in accordance with prevailing Indonesian regulations. These statutory obligations apply independently of Section 1.7 internal reporting requirements.
- Follow-up social-security reporting must also be completed within 2 x 24 hours of receipt of a medical certificate confirming recovery, disability, or death where required by applicable law.

Cambodia

- Regulation Reference: Labour Law of 1997 and Prakas on occupational safety and health.
- Employer Requirements: Provide a safe and hygienic working environment, conduct safety inspections, train employees on hazard prevention, and comply with Ministry of Labour inspections.
- Statutory incident reporting: workplace accidents must be reported within 48 hours (excluding rest days and public holidays where applicable) to the relevant labor or social-security authority. Workers are also required to notify their employer of workplace accidents within 24 hours where mandated by law.

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Myanmar [scope note: per current strategy, Agros' Myanmar activity is limited to service and warranty cases on existing installations; no new installation projects. OHS requirements below apply to Agros/partner personnel performing service visits.]

- Regulation Reference: Factories Act 1951 and Workplace Safety and Health Law 2019.
- Employer Requirements: Provide adequate PPE, conduct mandatory hazard trainings, and report incidents to the Factories and General Labour Laws Inspection Department.
- No fixed statutory reporting timeframe is stated in this Policy. Country management must verify and comply with all applicable local reporting requirements in force at the time of the incident.

1.12 Responsibilities for Local Compliance

- Country Managers: Ensure alignment with national OHS laws and regulations.
- Central Team (HR + Compliance): Maintain a register of OHS laws, support countries in annual audits, and consolidate reports into a global compliance dashboard.

REFERENCE

1. Grievance Policy; referenced in Sec. 1.3 and 1.7(a) as an alternative reporting channel.

2. Whistleblowing Policy; referenced in Sec. 1.3 and 1.7(a) as an alternative reporting channel.

3. Agros E&S Guideline, Annex B (E&S Risk Register) and Annex J (Training Matrix); referenced in Sec. 1.9.

4. Business Partner Agros (BPA) Program Guide; referenced in Sec. 1.8 for installation-posture context (BASIC vs. FULL package) only, not as a source of safety standards.

5. Peraturan Perusahaan PT Agros Global Indonesia (2025-2027), Pasal 37; referenced for the Indonesia statutory OHS framework underlying Sec. 1.11.

6. Occupational Safety and Health Law (UU No. 1 of 1970) and Manpower Law No. 13 of 2003; Indonesia, Sec. 1.11.

7. Labour Law of 1997 and Prakas on occupational safety and health; Cambodia, Sec. 1.11.

8. Factories Act 1951 and Workplace Safety and Health Law 2019; Myanmar, Sec. 1.11.

9. Incident Report Form (Template); to be created, referenced in Sec. 1.7(b).

10. Agros Field Safety Standard (current approved version); referenced in Sec. 1.8(b).

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Policy Owner	**Policy Enforcer**
Signed by: Max Nelen FFEA9CA8FF2A4C8... **Name:** Max Jean H Nelen **Title:** President Director / CEO **Date:** 8/14/2026	Signed by: Raisa Hosin 44164EEBC43D487... **Name:** Raisa Rossellini Hosin **Title:** Finance & HR Director **Date:** 8/14/2026