	<b>Environmental, Social and Health and Safety Management System (ESHSMS)</b> Policies	<b>Code:</b> POL/SS
		<b>Version:</b> 01
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## HEALTH & SAFETY POLICY

<b>Prepared by:</b>	<b>Reviewed by:</b>	<b>Approved by:</b>
Area: Environmental & Social (E&S) Name: Viviana Brun Position: Environmental & Social Coordinator Signature:  Date: 18/08/25	Area: Technical Management Name: Juan Pablo Nogués Position: Project Manager Signature: Date: 18/08/25	Area: Presidency Name: James Spalding Position: President Signature: Date: 18/08/25

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## VERSION HISTORY

<b>Version N°</b>	01			
<b>Date (dd/mm/yyyy)</b>	18/08/25			
<b>Changes</b>	Inclusion of note on alignment with corporate policies.			
<b>Prepared by</b>	Area: E&S	Name: Viviana Brun	Position: E&S Coordinator	Signature: 
<b>Reviewed by</b>	Area: Technical Management	Name: Juan Pablo Nogués	Position: Project Manager	Signature:
<b>Approved by</b>	Area: Presidency	Name: James Spalding	Position: President	Signature:

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## Health & Safety<sup>1</sup> Policy (POL/SS)

### Guiding Principles (PRs)

- Compliance with applicable provisions of the Paraguayan National Constitution, national laws and regulations, and the international standards to which the Project adheres regarding occupational health and safety, including primarily Decree No. 14390/93 “General Technical Regulation of Safety, Hygiene, and Occupational Medicine,” IFC’s Performance Standard (PS) 2 on “Labor and Working Conditions,” and the relevant IFC Environmental, Health and Safety (EHS) Guidelines.
- Adequate and continuous health and safety management, primarily promoting risk and impact prevention by providing and monitoring a safe and healthy work environment, and also fostering worker health.
- Continuous training and awareness on health and safety, responsibilities, and obligations, for Project workers to implement good practices.
- Ongoing monitoring and evaluation of health and safety performance, and improvement of Project plans and procedures.

To comply with these principles, ATOME will manage the following in its activities:

- Identify health and safety risks associated with the Project using recognized assessment methodologies and ensure the implementation of effective management measures to mitigate, control, and prevent workplace hazards.
- Identify and monitor compliance with mandatory health and safety standards and procedures applicable to ATOME's operations through internal verification mechanisms and periodic monitoring.
- Develop and implement comprehensive procedures for emergency preparedness, risk mitigation, and effective responses to incidents related to health and safety.
- Provide ongoing training and updates on health and safety standards to all ATOME workers, ensuring they are equipped with the knowledge of best practices and emergency procedures.
- Encourage consultation and communication on health and safety matters within the Company.
- Establish mechanisms to investigate, document, and report incidents, accidents, and occupational illnesses, allowing for thorough analysis to prevent future occurrences.
- Establish SMART (specific, measurable, achievable, time-feasible) objectives on occupational health and safety, supported by procedures to document and measure Project performance.
- Conduct internal audits and periodic reviews to assess progress against established health and safety objectives.

**As President of ATOME Paraguay S.A.E., I am committed to ensuring that the Company has an organizational structure and the necessary resources for the effective implementation of this Policy.**

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<sup>1</sup> **Safety:** For the purposes of this Policy, the word safety encompasses aspects of process safety, industrial safety, and security.

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This Policy will be communicated to and accessible by all personnel, at all hierarchical levels, including direct employees, contractors, or those representing the Company in any other capacity. Its implementation will be everyone’s responsibility, and compliance will be required of employees, contractors, subcontractors, and suppliers.

The Health and Safety Policy will be reviewed annually to ensure its relevance, effectiveness, and appropriateness to the Project context.

This Policy aligns with the principles established in ATOME PLC (UK)’s Corporate Policies on Sustainability, Ethics and Compliance, and Corporate Social Responsibility, adapting its guidelines to the local context and ensuring their implementation through the ESHS-MS.

Signature:

Name: James Spalding

Position: President

Date: 18/08/25