

Echo Investment S.A.

Environmental and Health & Safety Management System Manual

Document Name: Environmental and Health & Safety Management System Manual	First Issue Date: 12/04/2017	Issue Number and Date: Issue 20 / 12-12-2022
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General

Echo Investment SA. is one of the leading companies in Poland of construction-related services and development of projects and real estate.

Echo Investment SA. initiates and implements projects in close collaboration with major construction companies in Poland.

Kielce is the headquarter of Echo Investment SA.

The number of employees at each location varies, partly depending on the number of properties being developed or managed, but is more influenced by whether the maintenance activities of managing a property are undertaken by direct employees or contractors.

Tenants, financiers and insurance companies are increasingly demanding that environmental considerations be made in the development of properties. During the planning process taking environmental issues into account can reduce the impact a building has and may often mean lower operating costs.

Achieving effective Environmental and Health & Safety (short – EHS) management in an efficient and structured manner is an aim of the company by operating this Environmental and Health & Safety system in accordance with the international standards ISO 14001 and ISO 45001. The Environmental and Health & Safety management system covers all activities of the company, which have influence upon the Environmental and Health & Safety. It provides a basis from which we control our environmental aspects and health & safety issues and achieve improvements in Environmental and Health & Safety performance.

This EHS Management System manual serves as the means for directing users to all relevant documents within the Environmental and Health & Safety management system. As a reference document this manual is available and relevant to all personnel to ensure uniformity of understanding, give direction and facilitate training, particularly in the event of personnel changes.

Every employee is responsible for initiating improvements to this EHS manual. The EHS Director is responsible for coordinating and updating of this EHS manual, which is established and revised by the management. The CEO Echo Investment SA. will authorize and approve revisions of this EHS manual.

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1. Policies

ECHO Environmental Policy

We believe that project development and construction activity make a major contribution to a more sustainable world, so our company is committed to proactive environmental management at all levels. With this approach, we can positively influence key stakeholders, especially customers and suppliers.

Our organizational structure, management systems, procedures and training plans ensure compliance with all relevant laws, regulations and standards. Since environmental performance is one of our high priorities, it is integrated into core business processes and plans of our company. In a spirit of continual improvement, we involve our employees, sub-contractors, partners and other interested parties in the process of environmental management. This way we contribute to be the leading green developer and contractor.

Our ambition is to continually improve the environmental credentials of our projects and services. We are looking for new ways to reduce a negative environmental impact so that over time our stakeholders know we are a company capable of building environmentally sound projects.

How we act today will influence future generations. This is why we undertake following actions:

- We strive for the efficient use of energy and reduce emissions of gasses responsible for the climate change. If reduction is not possible, we try to balance our own direct emissions using accessible means.
- We strive for generating zero waste by reducing demand and reusing materials as far as possible, and where these options are not currently practicable, we ensure safe treatment or disposal of waste.
- We select and use materials that are benign to people and environmentally sound.
- We limit the impact of our operations on flora, fauna and related ecosystems.
- We reduce water demand, conserve and recycle water.
- We reduce harmful emissions to the air from projects, road vehicles, mobile and stationary equipment and processes.
- Training and people development is continued in green.

These commitments are also reflected in our policies, rules, guidelines and shared best practices.

ECHO Safety Policy

As the largest Polish developer Echo Investments aims to be one of world leaders in construction safety.

The company is committed to providing a safe and healthy workplace conditions for employees. We believe that all accidents and occupational diseases are preventable. Senior management is responsible for implementing processes that allow to achieve this goal.

We are aimed to provide safe and healthy work conditions at workplace by:

- Providing clear and visible leadership throughout the organization. We recognize that to achieve excellence in safety management, CEO and management staff must be involved in safety matters;
- Developing a safety culture in Echo that is based on promoting safety and management of safety risks as well as encouraging employees to work safely;
- Consultation and participation of employees and employees representatives in matters of health and safety;
- Having a structure and processes in place to ensure that our employees are competent in safety matters, including the competencies appraisal of staff with operational responsibilities;

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- Working with our suppliers, contractors and partners to improve their safety performance, by measuring and monitoring their health and safety performance;
- Promoting positive change to develop new laws and regulations that are aimed at improving safety in the construction industry, from cooperation with governments of all levels, to entrepreneurs, industry associations and other entities. Echo Investment promotes good practice in our industry;
- Engaging with our stakeholders through an open minded dialog about the impacts of our activities to continuously improve our safety performance.

We strive to achieve excellence in safety at all workplaces. This can only be done by being tolerant and respectful to everyone whatever their role is within the organisation.

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2. Environmental aspects

Environmental aspects are elements of an organization's activities and services that can interact with the environment. A significant ecological aspect should be understood as one that, among other aspects, may significantly affect the environment - both in a positive and negative context.

Environmental Aspects Identification and Registration

Identification of environmental aspects in ECHO takes place at individual stages of project preparation and implementation (processes in the organization):

- Plot purchase stage - the EHS Department together with the Property Management Department providing an inspections the purchased land in order to identify potential ecological aspects that may occur due to the construction works phase and at the use stage,
- Design stage - design documentation of the building / buildings is prepared by external design offices. At this stage, the identification of environmental aspects takes place as part of the preparation of the "Risks and Opportunities Register" document. Design offices developing documentation can indicate how the building, the construction materials used and the organization of the space around buildings can affect on surrounding environment,
- Construction Stage - the EHS Department, together with the ECHO project team, constantly monitors the conditions of the projects carried out, including in order to identify the environmental aspects on an ongoing basis and assess the effectiveness of the previously introduced measures to mitigate those aspects which may have negative impact.

The described and identified environmental aspects should be registered in the annex "Environment Aspects Register". After the document developing by ECHO's EHS managers submit the document to the EHS Director.

Described environmental aspects should be qualified as follows:

- significant or irrelevant
- type of aspect - indication of whether it may result from normal work (process in the organization) or whether it is an unusual or emergency aspect (deviation),
- process - it should be indicated from which of the processes it comes (pre-construction or construction phase).

Within the "Environmental Aspects Register" should consider:

- what is the method to managing the aspect,
- how to monitor the aspect.

Revisions of Environment Aspects Register. Monitoring at the construction phase.

The revision of the "Register of Environmental Aspects" will be carried out in annual cycles during the Management Review with the ECHO Management Board. Potentially revisions of the identified aspects may be related to changes in the organisation's policy and might be as the basis for setting future organization goals.

Contractors are obliged to provide to Echo ongoing environmental data, the so-called "Environmental indicators". These indicators includes: data on material supplies and waste removal (CO2 emissions - carbon footprint), compliant reports reported by third parties (relating to environmental issues), number of trees cut, sewage and water emission rates, waste generated and utilities consumption (water, electricity).

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Locally, for each of the conducted ECHO projects, starting from the design stage, the "Register of Project Risks and Opportunities" is developed. During the construction phase, the ECHO team on the project reviews and updates the document content.

Appendix:

CDM Design HS Guidelines Checklist
Project Risk and Opportunities Register
Guidelines for the protection of trees
Environmental Aspects Register

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3. Legal and other requirements

Where possible, during the process of Environmental and Health & Safety management, we review and identify legal and other requirements known to apply to each aspect. The process may be repeated with management review, or change to aspects.

In Poland where activities are ongoing the Local EHS representative sets up and maintains a library (or access to a library) of legislation and other requirements applicable to the activities. All staff concerned has access to this library. The identified legal and other requirements are compiled and updated at least once every six months or at the management review.

Legal and other requirements placed on contractors are stated in contract agreements.

In order to identify and handle the relevant legislation and other requirements a number of sources can be used. Some of these are:

- The company lawyer
- An external consultant
- Subscription to EHS legislation and EHS legislative updates.

Appendix:

[*EHS Laws and other requirements*](#)

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4. Objectives, targets and programs

Objectives and targets are set based on the significant environmental aspects, identified health & safety risks and opportunities and discussed around the following:

- Evaluated as significant,
- Needs to be resolved in the basic interests of the company,
- Within our control and/or influence,
- Falls within policies,
- Addresses the views of interested parties,
- Can be met with budgetary commitment.

Objectives and targets should be specific, measurable, acceptable, realistic and time limited (S.M.A.R.T.)

	Sub targets	Responsible	Compl.	Measurement	Target	Frequency of measuring
1	ESSV's to ECHO Investment S.A. projects	CEO, Board Members, Senior Management Team Regional Directors Nominated senior managers, Project Managers	31/12/2023	Number of documented reports	On average two ESSV per person per quarter, no more than three counts in each quarter; (PM- 2 visits and SM 1 visit per quarter and on other sites than PM's,/SM's ESSV or Peer Review)	Quarterly
	Opportunities:	Building and developing EHS awareness among the company's management. Possibility of assessing EHS standards at the company operational level.				
2	CEO, Board Members, Senior Management Team, Regional Directors to participate in one day EHS training per year	CEO, Board Members, Senior Management Team	31/12/2023	Percentage of CEO, Board Members, SMT, Regional Directors trained.	100%	Quarterly
	Opportunities:	Building and developing management competences in the field of EHS at the planning and operational stages.				
3	All Project Managers, Site Managers, Site Engineers shall participate in one day EHS training per year.	Project Management Team	31/12/2023	Percentage of Project Management trained	100%	Quarterly
	Opportunities:	Building and developing management competences in the field of EHS at the planning and operational stages.				
4	Working at height safety - all new projects (contract signed from august 2020) with implemented standard for edge protection guardrails on balconies.	Project Management Team, EHS Representatives	31/12/2023	Percentage of sites compliant	100%	Quarterly
	Opportunities:	Improving work at height protection and avoiding lost time accidents.				
5	Every year, the average summary result (compared to the previous year) is	Project Management Team,	31/12/2023	Average result for each division at the end of the year	The result is better than in the	Quarterly

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	getting better after internal ISO 14001/45001 audits, separately for each of the divisions: R4S, R4R and Office.	EHS Team			previous year	
	Opportunities:	Raising/Levelling EHS standards, sharing knowledge, between departments throughout improving working conditions, reduced accident rates and more efficient environmental protection on projects.				
6	Max 10% of crated waste to landfill and at least 90% of waste should be segregated at the construction site	Project Management Team, EHS	31/12/2023	Tonnage to landfill	100%	Quarterly
	Opportunities:	Reducing the amount of waste stored in landfills, limiting the adverse impact on the environment. Building awareness in waste management. Reducing waste collection costs.				
	Sub targets	Responsible	Compl.	Measurement	Target	Frequency of measuring
7	PM will participate in the internal ISO 14001/45001 audits (once per year) and at minimum once per month in the Peer Review or ESSV at own project.	Project Management Team, EHS	31/12/2023	Percentage of meetings with the PM's	100%	Quarterly
	Opportunities:	Building a EHS culture through leadership and involvement of top management.				
8	Implemented standard of site welfare facilities, according to the ECHO's guidelines – for the new projects	Project Management Team, EHS	31/12/2023	Percentage of the new projects with the implemented standard	100%	Quarterly
	Opportunities:	Improvement of employees' wellbeing, building a safety culture based on mutual respect and ensuring decent working conditions.				
9	Implementation of Eco Echo internal certification on Resi4S projects for new construction sites.	Project Management Team,	31/12/2022	Percentage of new construction sites with implemented certification	100%	Quarterly
	Opportunities:	Raising awareness and Eco standards on construction sites.				
10	Implementation of system protections for working at height during concreting reinforced concrete columns and walls: guardrails and steel working platform or ensuring a high standard of protection means of other access equipment (e.g. scaffolding).	Project Management Team, EHS	31/12/2023	Percentage of the new projects with the implemented standard	100%	Quarterly
	Opportunities:	Improving the works at heights safety, reducing the amount of the serious accidents at work				
11	Good level of housekeeping on the site, proper storage of materials (removal of unnecessary materials / tools on a regular basis); construction fencing in accordance with the Echo standard;	Project Management Team, EHS Representatives, EHS Team	31/12/2023	Number of negative comments on the cleaning and organization after the visits of the EHS department and the ESSV, Peer Review	At least 80% of the projects are compliant	Quarterly
	Opportunities:	Better organization of the construction site, less accidents, better image of projects.				

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5. Organization

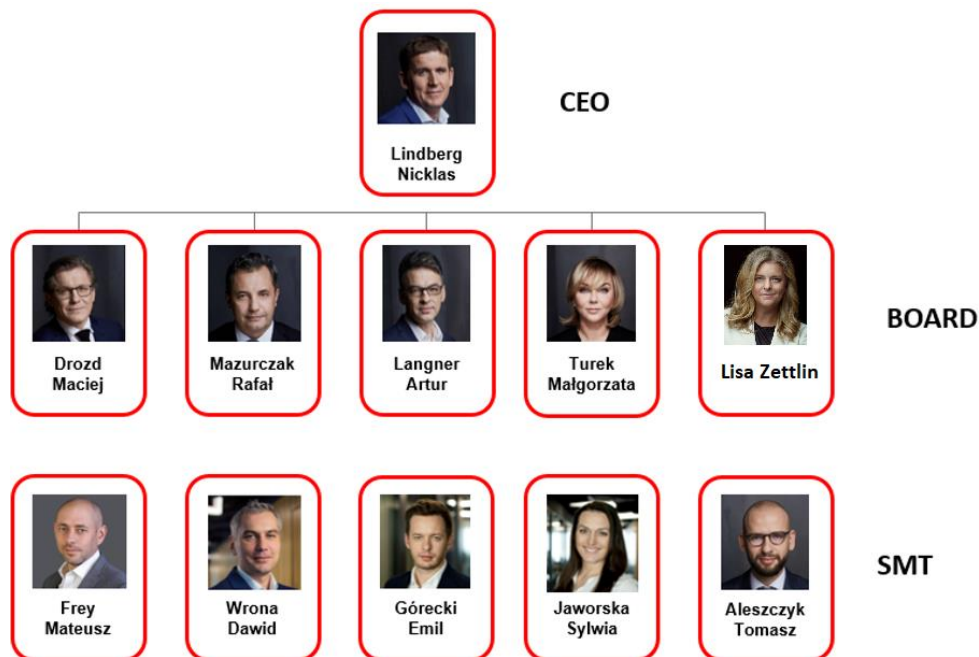
Specific responsibilities and authorities with regard to the implementation and continued effectiveness of the EHS management system are defined. Those for the operation of EHS system are defined in procedures and other supporting documents state the roles and responsibilities.

The Echo Investment SA. CEO appoints the EHS Director, who is also the management representative both for Environmental and Health & Safety issues. The EHS Director has a direct reporting line to CEO in regard of all matters concerning the EHS management system.

The Local EHS Manager / Coordinator oversees the implementation and functionality of the EHS Management System, gives support to the organization and reports to the to the EHS Director.

Employee representatives are chosen by the company's employees. They take part in meetings of the H&S Committees, consultations on improving working conditions, and mediate in providing information and requests from Echo Investment employees.

Echo Investment S.A. organization chart



EHS organization chart in ECHO Investment S.A.



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Employees Representatives in ECHO Investment S.A.



**Dorota
Pałysiewicz**



**Bartosz
Chróścielewski**



Karol Gałeczki

Responsibilities and authorities

Echo Investment SA. CEO

- Provision of sufficient resources to implement and maintain the EHS Management System
- Invites to Managements Review.
- Appoints EHS Director (Managements Representative).
- Delegation of responsibility and authority to the EHS Director and the Managements Representative.

Echo EHS Director

- EHS management system implementation overview;
- Maintenance of EHS management system;
- Certification liaison;
- Coordinate and perform EHS management system training;
- Coordinate and perform internal audits;
- Review the results of internal audit;
- Organize and perform Management Reviews;
- Propose objectives, targets and improvement programs;
- Approve Local EHS Managers;
- Report environmental and health & safety accidents to Echo;
- Ensure day-to-day implementation of the EHS Management System;
- Delegate responsibilities and authorize actions with regard to maintaining the EHS Management System and achieving improvement targets;
- Maintain central EHS Management System records;
- Distribute EHS Management System documentation;
- Propose requirements for EHS Management System training;
- Ensure compliance with Echo EHS requirements, including auditing arrangements;
- Follow-up and report the EHS Management System performance to top management of Echo;
- Agree and implement improvements in the EHS Management System.

Echo EHS Manager

- Auditing of Echo sites for compliance with ISO 14001 and ISO 45001, each construction to ensure compliance with the company's EHS requirements. Monitoring the implementation of recommendations in the event of non-compliance;
- Conducting ESSV visits. Monitoring the implementation of recommendations from visits by construction sites;
- Organizing and participating in Peer Review visits. Monitoring the implementation of recommendations from visits by construction sites;

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- Updating the list of applicable EHS regulations. Communication of changes to the construction sites;
- Ongoing review of the EHS management system documents and update it on Echo Extranet and Echo Intranet. Communication of changes to the construction sites;
- Monitoring current EHS targets defined for a given year and described in the EHS Manual;
- Conducting EHS training in accordance with the developed / approved training plan for a given year for each construction site and Echo/Contractors supervisors;
- Preparation of monthly and quarterly EHS reports, sending it to the EHS Director;
- Development, revision of EHS training materials depending on current needs resulting from statistical analysis of accidents / incidents, observations on construction sites, recommendations after audits;
- Analysis and participation in the preparation of IAN reports after accidents and serious incidents, communication on construction sites and monitoring the implementation of recommendations by the construction sites;
- Collecting and promoting of good EHS practices at Echo construction sites;
- Ensure that a risk assessment is undertaken for all project tasks and aspects using appropriate training and preventive measures;
- Creating a uniform EHS standard implemented with the participation of Contractors on joint projects. Support for the implementation of the EHS Management System for new construction sites;
- Promotion of Echo Investment S.A. as an organization that creates and meets high EHS standards;

EHS Site Coordinator

- According to the document " EHS Coordinator Responsibilities and Entitlements"

Employees Representatives

- participation in consultations and meetings regarding working conditions,
- participation in consultations and meetings regarding the improvement of H&S conditions,
- forwarding an employee requests to the Management Board and EHS Department aimed at improving H&S conditions in the organization, participation in determining actions to eliminate hazards and reduce H&S risks,
- participation in the development of the Safety Policy,
- participation in hazard identification and the development of occupational risk assessment.
- participation in consultations regarding competences, training needs and evaluation of trainings quality,
- participation in determining the way of communication, scope of information to communicate in the organization,
- participation in determining supervision measures and their effective implementation and application,
- participation in analyzing incidents and non-conformities and determining corrective actions.

Echo Project Manager/ Site Director

- Overall responsibility for the effective implementation and execution of the EHS Management System on sites;
- Providing adequate resources for the implementation and management of the Echo EHS System;
- Active participation in current health and safety initiatives e.g. safety reviews, training, etc.;
- Implementation of the annual EHS goals described in the EHS Manual;

Appendixes

[*EHS Coordinator Responsibilities and Entitlements*](#)

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6. Competence and training

Every employee or person working on behalf of the organization and who has influence upon environmental and health & safety issues shall be adequately competent to perform his/her tasks.

Every Echo Investment SA. area identifies training needs by comparing competence requirements, of today and the future, with existing competencies.

EHS training will normally be considered to take two forms:

1. General training to all staff obligatory by the law.
2. Specific training that relates to identified parts of the EHS management system, environmental and health & safety aspects or improvement programs, or to specific activities of the employee.

As a minimum staff need to understand:

1. The importance of complying with policies, procedures, legal and other requirements, and the EHS management system.
2. The significant environmental and health and safety impacts of the company.
3. Their individual roles and responsibilities, including in the event of emergency.
4. The consequences of departing from specific requirements of the EHS Management System.

On construction sites as well as in facility management all employees of Echo Investment S.A., shall have safety training and occupational medical examination when they start to work. Responsible for initial, periodic training and occupational medical examinations is the HR department of Echo (HR Director). The trainings are conducted by the external training unit Seka. All persons that work on the construction site (including guests) shall have been trained in health and safety (health and safety induction training) by the General Contractor / Site Manager. The training is recorded and signed for receipt by the employee. The training is carried out by the person managing employees designated by the employer or the employer itself, if these persons have appropriate qualifications and professional experience and are trained in the methods of conducting workpost training.

General training matrix in Echo Investment S.A.

Training type	Duration	Category/ Position	Execution	Responsible
Initial and periodical Safety training	According to the law	All employees	Before commencing work and periodically	Direct supervisor and HR department
Workpost training	According to the law	All employees	Before commencing work and changing workpost / construction site	Direct supervisor and HR department
EHS induction for employees / visitors	0,2h	All employees and guests	Before entering the construction site	General Contractor / Site Manager
Specialized training: working at height, hot works, vertical transport etc.	1-2h	Site supervisors (incl Contractors)	On an ongoing basis depending on the needs and the construction stage	EHS Department
Safety awareness SOT training	2-3h	Site supervisors (incl Contractors)	On an ongoing basis depending on the needs	EHS Department
Fundamental SMSTS training	2-3 days	The board and senior management of Echo and Echo employees on construction sites, Designers, Purchasing and Coordination of Tenants Department	Once	EHS Department

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Refresher SMSTS training	1-2 days	The board and senior management of Echo and Echo employees on construction sites, Designers, Purchasing and Coordination of Tenants Department	Once a year, periodically	EHS Department
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Appendixes:

Training record (example template)

Contractor's list of employees and equipment (example template)

EHS Coordinator Responsibilities and Entitlements

EHS Induction Employee

EHS Induction Visitors

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7. Communication

The Local EHS Manager / Coordinator for an area will address external communications of specific relevance to it including:

1. Communications from interested parties.
2. Responses to interested parties.
3. Communication of policies and Echo's Health & Safety Requirements and Echo Group's Sustainability Reports.

Interested parties may be considered to include:

- Tenants.
- Neighbours
- Shareholders
- Other investors
- Employees

- ECHO Employees Representatives
- Contractors/suppliers
- Visitors to Echo properties
- Local Government/Authorities
- Non-governmental organizations

All communication with external parties is documented and reported to staff concerned. Internal communication is performed by meetings, and collecting and distributing of information, communication of decisions. Internal communication is documented. Echo Group's communication policy and communication rules are used in communication process

Appendixes:

Training record (example)

Contractor's list of employees and equipment

EHS Coordinator Responsibilities and Entitlements

EHS Induction Employee

EHS Induction Visitors

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8. Document control and records

This EHS manual is available to all staff of Echo either as a paper copy or in digital form on an intranet page.

The master copy of this EHS manual is retained and maintained by the EHS Director. The amendments and the nature of the change are recorded and made available to all staff.

Superseded versions of this EHS manual are archived as EHS records by the EHS Director.

The primary EHS related documentation is contained in this EHS manual. Other requirements are contained in documents derived from other activities within the organization. These are referenced in the relevant parts of this document and listed below.

All EHS documents are maintained and revised by the person issuing the document. Where necessary they are approved by authorized staff according to procedures. EHS documents from external sources (e.g. clients, authorities) shall be identified and distributed to relevant staff. Documents are filed, for easy location, according to a filing system common for every unit. Not valid documents are archived internally as obsolete in the EHS ECHO Department.

Records demonstrating the effective operation of the management system and compliance with specified criteria are maintained. Records can be both in form of paper documents or in digital versions. Staff, responsible for a certain activity, which shall be documented, are also responsible that a record will be established and archived.

The EHS Director centrally and the Local EHS Managers / Coordinators locally are responsible to ensure that records are easy to locate through a filing system, legible, preserved, and retained according to the minimum period of times according both to the enclosed table and mandatory legislation.

Appendixes:

[*Retention times for documents*](#)

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9. Operational control

The activities associated with our significant Environmental aspects and Health & Safety hazards are identified through the Environmental aspects resp. Health & Safety risks and opportunities assessment. If no improvement program exists for a particular significant aspect or hazard, the method of maintaining management control is defined.

Documented procedures are established where necessary to prevent deviation from our policies and our objectives and targets for improvement. The controls in place specify the means by which applicable activities must be undertaken. Where procedures for operational control relate to the activities of contractors contracted by Echo Investment SA., the contractor shall be directed of the Environmental and Health & Safety requirements by contractual conditions.

Main Echo Investment SA. activities related to EHS management are:

- Purchase of land and buildings
- Procurement of materials and services (e.g. facility management, consultants, designers, contractors)
- Environmental and Health & Safety management of project or facilities

Purchase of land and buildings

Before purchase of land and/or buildings a detailed environmental investigation shall be made to determine the environmental pollutions and the existence of hazardous substances. The investigation shall as a minimum include a review of the historical and present situation, and if relevant, also tests of samples (i.e. soil investigation and samples of construction materials and waste). The result of the investigation will give a good knowledge of the environmental status and the following consequences (economical and environmental).

Although investigations are made, it should be stated in the agreement that the seller is responsible for pollutions and hazardous substances. If the investigation indicates or shows that pollutions or hazardous substances exists, and the seller is not willing or capable to give guarantees, a detailed economical risk analysis shall be made before purchase.

Procedure for acquisition of the investment properties

The purchase of undeveloped and developed property requires monitoring, among others in the field of physical protection of plots against unauthorized access. This process requires the cooperation between the Management Department, the Investment and Development Department, the EHS Department and the Construction Department and is the subject of the "Procedure for the acquisition of the new investment properties".

Procurement process

Procurement might be the purchase of goods and services (consultants, contractors etc.) both for facility management and for the different phases of projects.

Preparatory work

The Purchaser collects all information gained during previous phases and/or similar procurement work. The Purchaser prepares tender documents to suppliers for calculation and offer. The interfaces between the suppliers shall be clarified in the inquiry. The Environmental and Health and Safety plan and Echo Health and Safety Requirement document must be considered at this stage. All orders and agreements are, as far as possible, prepared according to Echo's standard forms. The forms may be adjusted for special demands such as special features of project and local rules. The Legal Advisor shall approve substantial differences from the standard forms.

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Supplier Selection

The Purchaser liaisons with the Facility/Project Manager to select and prepare the list of potential bidders. It is vital that the List of Bidders is selected with the utmost care and with all the required research. The Purchaser normally uses the following information:

- Bidders in the calculation phase (if applicable)
- Local Suppliers List (if exist)
- Past purchase of similar items
- Echo Groups purchasing network
- Environmental and Health and Safety Performance assessment (PQQ)

Before a new interested supplier is approved to tender, he must be evaluated. The Purchaser evaluated all suppliers in scope of Environmental and Health and Safety performance, which gives an overview of all existing and possible suppliers of the organization. An evaluation of a supplier should be renewed as and when required to show the current environmental status.

It is the Purchasers obligation to find a number of bidders that secure free competition and represent the best available conditions regardless of local market conditions.

Inquiries

A standard Inquiry Template, adjusted for the facility/project and the purchase at hand, including tender documents and contractual Environmental and Health & Safety requirements will be sent out to selected suppliers for tendering. Only people affected shall know the names and amount of the suppliers selected.

Placing an order

Regardless the order value, all orders are made in writing. The Purchaser will prepare an agreement draft, including the Environmental and Health & Safety requirements. The Legal Advisor will review the agreement.

Procurements that are chronologically, financially, quality wise, environmentally significant or critical from some other aspect require a special Environmental and/or Project Plan from the Consultant/Contractor/Supplier, approved by Echo. The control measures required from the Consultants/Contractors and Suppliers are stated in the Agreements. Special attention should be paid to critical work phases or phases requiring special supervision as specified in the Echo Health and Safety Requirements and shall be included in the Agreements as the Suppliers obligations.

Requirements for product identification and traceability shall be specified in the Agreement documentation and be a part of the inspection program.

Communication of purchase

After sending the order to the Consultant/Contractor/Supplier, the Purchaser distributes copies of the order to relevant persons within Echo and places the order for filing according to the local filing procedure.

Unsuccessful tenderers receive a letter declining acceptance, after the successful tenderer is appointed.

Contractor qualification is valid for 3 years but only if recent questionnaire is available for review..

Appendixes:

[Environmental investigation of land – checklist](#)

[Environmental investigation of building – checklist](#)

[Procedure for the acquisition of the new investment properties](#)

[Trade contractor EHS questionnaire](#)

[Echo Health and Safety Requirements \(with appendixes\)](#)

[ESSV Guidance](#)

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10. Emergency preparedness

A risks and opportunities analysis is performed at every office, property or project. Based upon this analysis a tailored emergency preparedness plan is prepared specifying how to manage environmental responsibilities, health & safety emergencies and contact information to local and national authorities and personal telephone numbers to key staff.

The risks and opportunities analysis is based upon the review of activities made at identification of the significant environmental aspects and upon identified health & safety hazards and potential opportunities. The tenant's activities are included in the risks and opportunities analysis.

A further analysis is made for activities with a high risk for emergencies. The analysis is made by studying for every activity:

- 1) Emergency situation,
- 2) Cause of the emergency,
- 3) Impact on the surroundings caused by the emergency,
- 4) Impact upon the human being.

The risks and opportunities are quality valued by both looking upon the probability of the emergency to occur and the consequences caused by the emergency.

All incidents or emergency situations are documented. The internal audit and management review considers these events and the effectiveness of actions taken in mitigating impacts and preventing recurrence. At management review any relevant accident and emergency is considered with a view to revising procedures.

Appendix:

[*Emergency preparedness plan \(example template\)*](#)

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11. Monitoring and measurement

The means by which activities associated with some of the significant environmental aspects and health & safety hazards are monitored and measured are specified in the Echo Health and Safety Requirement document the detail includes the operational control if necessary and the progress towards achieving improvement targets by review stages. If needed activities associated with a significant environmental aspect or a health & safety hazard are the subject of procedures for monitoring and measurement.

The environmental targets are reported quarterly and safety metrics are reported monthly to Echo Investment SA. by the EHS Director.

Local EHS Managers report quarterly to the EHS Director on progress towards achieving the targets set. Included in the report will be other environment and health & safety related information of relevance, such as accident reports etc.

At least annually compliance with applicable legislation and other requirements is reviewed by the Local EHS Manager and documented. On an ongoing basis, the improvement reporting process includes consideration of whether any nonconformance occurring constitutes legal/regulatory non-compliance.

The following activities are part of and/or evidence that checking of evaluation of compliance is made:

Project Development:

- Design permit issued by authorities;
- Design meetings with environmental and health & safety issues on the agenda;
- Control of design by independent consultant;
- Project meetings with environmental and health & safety issues on the agenda;
- Regular checking on site by independent consultant;
- Environmental and health & safety rounds;
- Handing over certificate issued by authorities;

Facility management:

- Facility management meetings with environmental and health & safety issues on the agenda
- Environmental and health & safety rounds
- Annual air pollution report to authorities.
- Annual report to authorities of sampling and emptying of grease and oil separators.
- Statement from waste management company of amounts and separation of waste
- Buyers due diligence during the selling process

Appendixes:

[*Safety Metrics Reporting Protocol \(monthly\)*](#)

[*EHS status report \(quarterly\)*](#)

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12. Nonconformity procedure

Every employee is encouraged to find and report nonconformity and indicate possible improvements.

Reasons for nonconformities (and resp. possible improvements) could be:

- *Departure from the provisions of the Environmental and Health & Safety Management System and Echo Health and Safety Requirements;
- *Deviation from the reasonable expectation of interested parties concerning environmental and health & safety performance.

The cause and possible legal implication of a nonconformity are investigated. The Local EHS Representative investigates the nonconformity in depth, and decides any required corrective and preventive action and assigns responsibility for ensuring implementation of the same. The results and effectiveness of the corrective and preventive actions are monitored. Any procedural changes resulting from the corrective and preventive action are implemented, referenced and notified to all relevant staff.

All phases of the nonconformity procedure as stated above are documented on the Nonconformity Report Form or dedicated report. See details below.

EHS noncoformity

Serious EHS nonconformities shall immediately be reported on a Nonconformity Report form both within the line organization and to the CEO, EHS Director, Construction Director and Project Manager.

This procedure shall apply to each specific area of Echo Investment SA. and shall include the following defined nonconformities:

- A serious EHSI incident that results in a breach of an environmental legal requirement.
- Or any other EHS incident that may pose a significant threat to the surrounding environment or that may result in adverse publicity for the Echo operating company involved.

Reporting of a serious EHS nonconformities

To define the responsibility and authority for handling serious nonconformities, taking action to mitigate any impacts caused and for initiating and completing corrective and preventative action reports the Management of each specific area of Echo Investment SA. is committed to conduct all EHS operations that are protective.

The following reporting procedure regarding nonconformities shall be implemented to ensure the timely reporting of all non-conformances or serious EHS incidents, which may have an effect on the Echo organization. The following procedures and reporting structure shall apply and be followed.

1. Upon discovery of such nonconformity the Local EHS Manager shall be notified immediately.
2. Corrective actions shall be taken to eliminate the causes of actual or potential EHS problems and the actions taken shall be commensurate with the environmental impact encountered.
3. The nonconformity shall be documented to include a description of the situation, a preliminary risk evaluation and a preliminary action plan. This report shall be provided immediately without any delay and be submitted to the Construction Director of the project and to the EHS Director of Echo Investment SA.
4. The EHS Director of Echo Investment SA. is responsible for communicating the report to the CEO and SMT of Echo Investment SA.

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Fatal accident

Fatal accidents shall immediately be reported both to local authorities as required by local law and to the same persons within Echo as stated above. Further reporting and investigations of fatal accidents shall be done according to instructions of the CEO of Echo Investment SA.

Other health and safety accidents

Accidents in which suffered employees employed directly by ECHO will be reported to the Local EHS Managers and then to the EHS Director, using the Health & Safety Accident Report template. Accordingly an official information will be distributed to the Local Authorities, based on law obligation.

Appendixes:

[Health & Safety accident report](#)
[IAN Report template](#)

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13. EHS Management System audit

A program of audits is established to:

1. Oversee the progress of improvement toward achieving targets.
2. Ensure the system conforms to planned requirements.
3. Assure continued compliance with recognized standards as may be appropriate.
4. Demonstrate and secure future, proper implementation of the system.
5. Provide information to top management for management review.

Audits address the progress of EHS management system and the supporting system structures. The audit program is kept with and managed by the EHS Director.

The EHS Director assigns each audit to an appropriate and capable auditor. The auditor will perform the audit objectively and with impartiality.

The scope of each audit includes the system elements stated in the audit program, kept by the EHS Director, for activities at the stated locations. To the extent that is practical the audit follows the process defined in ISO 14001 and ISO 45001.

A template is used for audit reports, which record observations and nonconformities found including all documents and objective evidences observed. The EHS Director feeds relevant information into the Management Review.

The audits can be divided into an audit for the whole business, Business Audit, or for a project, Project Audit. The extent of an audit is defined in the Audit Program. An audit is not completed until any nonconformity found is corrected.

The purpose of the Business Audit is to assure that Echo Investment SA. management system is followed, that the management system has targets, which can easily be carried through, and that the opportunity for improvements is secured. All parts of the EHS-manual are audited at least once a year.

The purpose of the Project Audit is to assure that the Project Plan is in compliance with the management manual, that the Plan is followed, has targets, which can easily be carried through, and that the opportunity for improvements is secured. All parts of the Project Plan are audited at least once during the project time.

The auditors executing the internal audits must have undergone suitable training.

Appendixes:

[Internal Audit programme](#)

[Audit Report](#)

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14. Management review

At the yearly Management Review meeting, the EHS Director presents substantive issues arising from operation of the EHS Management System. He also suggests improvements to the EHS Management System, policies, programs, objectives and targets. The management team takes decisions to fulfill the commitment to continual improvement.

Commitment of resources to develop and maintain the EHS Management System, plus the continual improvement in environmental and health & safety performance it is designed to achieve is ensured through the annual budgeting and monitoring process. This is considered in terms of financial, human and technical resources, is reviewed throughout the year at management review and may be subject to change. Resources for improvement in environmental and health & safety performance are directed at the significant environmental aspects responsibilities, health & safety hazards, but others may also be addressed.

Minutes of the management review are retained as an EHS record.

Appendixes:

[Management review, agenda](#)

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15. List of revisions and issues to EHS Management System Manual

Name of document	Update or addition	Kind of update/addition or direction to more complete description	Issue no. / initiated by / date	Approved by / Date
EHS MANUAL ISSUE 1	General revision	General revision	Stephen Iddon	Nicklas Lindberg 03-05-2017
Attachments to EHS Manual	New documents acc. to list of attachments	Documents were developed and implemented	Revision 1 Stephen Iddon 19-05-2017	Nicklas Lindberg 19-05-2017
Reporting of serious environmental nonconformities	New document	Document developed and implemented	Revision 2 Stephen Iddon 19-05-2017	Nicklas Lindberg 19-05-2017
Project Risk Register	New document	Document developed and implemented	Revision 3 Łukasz Bartnicki 31-11-2017	Stephen Iddon 31-11-2017
Environmental, Health and Safety Manual	Update	Update: added goals agreed for 2019 Chapter 4. <i>Objectives, targets and programs</i>	Revision 4 Łukasz Bartnicki 14-01-2019	Stephen Iddon 14-01-2019
Environmental, Health and Safety Manual	Merging attachments	Chapter 5.- the name of the attachment has been changed "Trade contractor EHS questionnaire" due to merged documents "Subcontractor HS questionnaire" and "Environmental assurance consultant contractor supplier"	Revision 5 Łukasz Bartnicki 14-02-2019	Stephen Iddon 14-02-2019
Environmental, Health and Safety Manual	Update, new document - attachment	Chapter 5 updated Responsibilities of ECHO: EHS Manager, EHS Coordinator, Echo Project Manager and ECHO Site Manager; added attachment "EHS Coordinator Responsibilities and Entitlements"	Revision 6 Dariusz Nowak 18-03-2019	Stephen Iddon 18-03-2019
Environmental, Health and Safety Manual	Update	Added new chapter no. 15 „List of revisions and issues to EHS Management System Manual”, attachment "Register of updates, additions to EHS Manual" was deleted.	Revision 7 Łukasz Bartnicki 10-04-2019	Dariusz Nowak 10-04-2019
Register of updates, additions to EHS Manual"	Removal of attachment	Changed EHS Dept. structure.		
Environmental, Health and Safety Manual	New document	Chapter 16 "Appendixes list": <ul style="list-style-type: none"> • Changed name of attachment "Lifting Permit – Tower Cranes", • Added new attachment "Lifting Permit – Mobile Cranes", • "Truck Mounted Cranes Checklist" has been removed, • "Design Health and Safety Risk Registered" has been removed. 	Revision 8 Łukasz Bartnicki Andrzej Czenczek 29-05-2019	Dariusz Nowak 29-05-2019
Environmental, Health and Safety Manual	Update Removal of attachments	Chapter 12. "Nonconformity Procedures" change in the description regards the use of "H&S Accident Report". Chapter 16. "Appendixes List" following documents were deleted: <ul style="list-style-type: none"> • Training Plan, • Environmental and safety rounds, facilities – checklist • Nonconformity report • Assessment and Pre-Qualification of Designers 	Revision 9 Łukasz Bartnicki 29-05-2019	Dariusz Nowak 29-05-2019
Environmental, Health and Safety Manual	General Revision	Chapter 6 "Competence and Training". Overall correction of description.	Revision 10 Łukasz Bartnicki 26-09-2019	Dariusz Nowak 26-05-2019
Environmental, Health and Safety Manual	Update	Update: added goals agreed for 2020 Chapter 4. <i>Objectives, targets and programs</i>	Revision 11 Łukasz Bartnicki 02-01-2020	Dariusz Nowak 02-01-2020

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Environmental, Health and Safety Manual	Update	Adaptation of the content of the following documents for compliance with the requirements of ISO 45001: <ul style="list-style-type: none"> • Environmental, Health and Safety Manual, • ECHO EHS Requirements, • ECHO Safety Policy (including EHS Manual chapter), • Retention Times, • CDM Design HS Guidelines Checklist • Project Risks and Opportunities Register, • Audit Report 	Revision 12 Łukasz Bartnicki Andrzej Czenczek 25-05-2020	Dariusz Nowak 25-05-2020
Environmental, Health and Safety Manual	Update	Chapter 6. Competence and training. Clarification of information on EHS induction training and workpost training and on the department / person responsible for training and medical examinations	Rewizja 13 Łukasz Bartnicki Andrzej Czenczek	Dariusz Nowak 06-08-2020
Environmental, Health and Safety Manual	New document	Chapter 9. Operational Control Added subchapter and attachment "Procedure for acquisition of the investment properties"	Revision 14 Łukasz Bartnicki	Dariusz Nowak 27-11-2020
Environmental, Health and Safety Manual	Goals update	Updated Goals: <ul style="list-style-type: none"> - No 4 changed - No 5 changed - No 10 added - No 11 added 	Revision 15 Łukasz Bartnicki	Dariusz Nowak 29-12-2020
Environmental, Health and Safety Manual	Update / new documents	Chapter 2 Environmental aspects Added information on the submission of environmental data by contractors and information about protection of wildlife. The following documents were added to the Book: <ul style="list-style-type: none"> - Carbon footprint monitoring at construction sites, - Guidelines for the protection of trees. 	Revision 16 Andrzej Czenczek	Dariusz Nowak 02-02-2021
Environmental, Health and Safety Manual	Update	Chapter 5 Organization Updating of organigram (Members of Board and SMT) after changes in the organization.	Revision 17 Łukasz Bartnicki	Dariusz Nowak 11-05-2021
Environmental, Health and Safety Manual	update	Updated EHS goals for the year 2022.	Revision 18 Dariusz Nowak	Dariusz Nowak 15-12-2021
Environmental, Health and Safety Manual	update	Updating the chapter 2. Environmental Aspects Added attachment "Environmental Aspects Register"	Revision 19 Łukasz Bartnicki	Dariusz Nowak 21-01-2022
Environmental, Health and Safety Manual	update	<ul style="list-style-type: none"> • Updated EHS goals for the year 2023, • Updated information of the ECHO employees' representatives due to the last changes, • Updated Board Member organigram. 	Revision 20 Dariusz Nowak	Dariusz Nowak 12-12-2022

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16. Appendixes list

EHS Manual related appendixes:

1. Echo Environmental Policy
2. Echo Safety Policy
3. Project Risks and Opportunities Register
4. EHS laws and other requirements
5. Management review, agenda
6. Training record (example template)
7. Complaint report
8. Retention Times
9. Environmental investigation of land – checklist
10. Environmental investigation of building – checklist
11. Emergency preparedness plan (example template)
12. Safety Metrics Reporting Protocol
13. EHS status report
14. Audit report
15. Audit program, internal audits
16. CDM Design HS Guidelines Checklist
17. EHS Coordinator Responsibilities and Entitlements
18. EHS Induction Employee
19. EHS Induction Visitors
20. Procedure for the acquisition of the new investment properties
21. Environmental Aspects Register
22. Guidelines for the protection of trees