

RISK ASSESSMENT POLICY

MPC PROPERTIES

Organization considers and manages risks and opportunities in a different manner, depending on the necessity. Risk management is focused on reducing their occurrence and reducing their impact if the risk occurs anyway. Opportunities are managed in a way to increase their occurrence and to get as many advantages as possible for their benefits. Where there are risks and opportunities at the same time, at a certain point, it is decided which method would be best to use. Elements that, in this way, make “mixed” uncertainties, may require the use of methods that can consider negative consequences of risks and positive opportunities at the same time. Special method for risk management that ranks risks based on probability and consequence is applied (FMEA: Failure Mode Effect Analysis). After identifying risk and process, it is necessary to describe risk effect and assess severity of risk effect. Severity can be assessed with grades of 1 (minimal severity – no impact on the process or users) to 6 (the highest severity – affects the violations of regulations and causes financial damage). Next step in risk assessment is describing cause of the risk. After determining the cause, it is necessary to determine probability of occurrence of that risk. Probability can be assessed with grades of 1 (minimal probability – almost exclusive, never happened before) to 6 (the highest probability – very often occurrence, it happened in last 3 months). The last step in risk assessment is to determine current way of detection. The current detection refers to how soon can you notice the risk. After determining the current way of detection, it is necessary to assess detectability. Detectability can be assessed with grades of 1 (the easiest detection – unavoidable detection in next activity) to 6 (the most severe detection – detection is possible after a long period of time). After finishing risk assessment, it is necessary to multiply each other’s ratings to get RPN (Risk Priority Number). After receiving RPN it is necessary to define recommended risk measures. After defining recommended measures, it is necessary to define deadline and employee who is going to be responsible for implementation of the measure. It is necessary to do risk reevaluation at least once a year, so it is possible to notice if recommended measures had any effect on lowering risk impact.

A. OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

Occupational health and safety system has been implemented according to legal requirements.

All MPC Properties employees are covered by an occupational health and safety management system.

Occupational health and safety management system include company Risk assessment Act that has to be updated regularly, training and education of employees on HSE subject, inspection work environment and equipment, medical checkups according to their job description, cooperation with occupational medicine competent authority office, reporting on work-related injuries, adoption and application of preventive measures related to safe work environment and keeping record through 14 different record forms as listed below:

i)	Ob1 - List of job positions with increased risk
ii)	Ob2 -List of employees occupying jobs with increased risk and medical check ups in accordance with named positions
iii)	Ob3 -Record of work-related injuries
iv)	Ob4 -Record of occupational diseases
v)	Ob5 -Record of work-related illnesses
vi)	Ob6 -Record of employees trained for safe and healthy work
vii)	Ob7 - Record of dangerous materials used during process of work
viii)	Ob8 - Record of performed test of working environment
ix)	Ob9 - Record of executed inspection of work equipment
x)	Ob10 -Record of issued resources and equipment for HSE
xi)	Ob11 - Record of death reports, collective and heavy work-related injuries as well as work-related injuries after which employee is not able to work more than 3 days per week
xii)	Ob12 - Record of reported occupational illnesses
xiii)	Ob13 - Record of medical check ups in accordance with HSE regulations
xiv)	Ob14 - Record of reported dangerous occurrences which could jeopardize HSE at work place.

All employees, regardless of their position, job description or contract are obliged to receive basic HSE training and consequently to take the test.

All employees, regardless of their position, job description or contract are obliged to receive basic HSE training and consequently to take the test.

Specific positions like technicians and maintenance workers are obliged to receive training for work at height, confined space and hydraulic platform machinery.

Occupational health and services function is combined between HR and HSE licensed person. HR keeps all documentation within its department and provides information on new employees and all statistics regarding subject. HSE person oversees all trainings, basic and specific, all work-related incidents and reporting. All employees undergo HSE trainings according to job description in prescribed timeline (some trainings are mandatory every year, some every 2 or 3 years). HR also follows up on all health checkups that have to be done in timely manner (e.g. ophthalmologist). Should any employee have medical limitation (e.g. forbidden work at height), HR adapts job description and job title to corresponding situation.

All documentation is held in HR and only HR has access to it.

HR has health-related documentation only in cases of work-related incidents and mandatory health checkups for prescribed positions (technicians, maintenance staff...).

Due to Serbian law, all other health-related documentation that has no impact on work cannot be asked from employees. If employee uses sick days, for any reasons, regardless of if it is work-related or not, medical institutions provide document that state that employee is ill, but without any details.

All employees undergo through health and safety basic training. Specific positions take specific trainings due to their job description. In all of those trainings employees are instructed what is proper way of handling regular daily job tasks as well as how to behave in risk situation (e.g. fire).

i)	Organization ensures quality of these processes by having HSE person who is obliged to have license prescribed by authorities.
ii)	All processes are revised once a year in order to improve the occupational health and safety management system and also to comply with new regulations if there are any.

If there are any work-related hazards (according to Serbian law, any injury at work has to be reported, regardless of its seriousness - e.g. sprained ankle in office space) employee must contact immediately his/her superior who will further inform HR and HSE licensed person. HSE licensed person will further take necessary information to fill in prescribed form and register that form with competent authority office. This form is based on employee statement regarding incident, witness statement and medical documentation. Further, Company is in process of introducing application suited for PC and mobile use (all employees have company phone) to facilitate whole process of reporting work-related injuries.

All employees have right to remove themselves from work situation that they believe could cause injury or ill health when they are in situation of imminent danger for their life and health, if they are not informed about all risks and preventive measures at their work position, if equipment and other means of work are not within prescribed HSE regulations, longer hours of work then according to law or night work if that work can, with conclusion from occupational health authority office, endanger or deteriorate employee's health. Employees are protected against reprisals by adoption of new preventive measures, with training and educations in accordance with their work position and in general, applying all regulations prescribed by law.

HSE licensed person is part of all work-related incidents. He/she investigates all incidents based on injured person statement, witness statement and medical documentation. Through those investigations it is concluded what kind of incident has happened, what part is human error and what part may be equipment disfunction e.g. based on those conclusions HSE person is recommending what steps are to be taken and what improvements need to be made in occupational and safety management system.

All workers must undergo HSE training that complies with their position and job description. All trainings must be repeated in timely manner and according to prescribed timeline which is different for different positions.

Company does not have formal joint management-worker HSE committees, and therefore this article is not applicable.

All employees and workers who are not employees but whose work and/or workplace is controlled by the organization undergo basic HSE training. For persons who have job description with higher risk additional training is provided in accordance with their professional needs. Some of the trainings are repeated every year or less if there are any changes prescribed by law or new circumstances such as new rules and procedures that are implemented in order to prevent new incidents particularly in area of managing new machinery. All trainings are developed in language that all included can easily understand - in their native language. Also, all trainings are provided free of charge and during regular working hours. Effectiveness of the training is evaluated through test and consequently with number of work-related injuries.

Company has, as part of benefits, additional health insurance, that provides all employees with unhindered access to medical help regardless of its work related or not. Employees have full access to medical care apart from dental insurance. Vaccines are provided by the state, and they are not chargeable. Government is expanding list of vaccines regularly. E.g. Covid vaccines are provided by the state and state has exclusive right on these, and all citizens are eligible. State has also provided Covid vaccines from different manufacturers, and citizens were able to choose which one they want. All of that is free and therefore is not provided by additional medical insurance.

B. SECURITY PERSONNEL TRAINED IN HUMAN RIGHTS POLICIES OR PROCEDURES

All security personnel are third party employees. According to Republic of Serbia Law, all companies that have license to provide security services are going through numerous trainings to fulfill their duties respecting human rights. Those trainings are as follows:

- Codex of professional ethics in private security business
- Court of honor - ethics commission in professionalization of private security business
- Supervision of records and data protection
- Application of measures in identity check, vehicle check and warning issuing for temporarily detaining until arrival of police
- Use of force (if and when)
- Necessary defense - defined conditions for attack
- Necessary defense - defined conditions for defense
- Exceeding deference of necessity
- Conditions for existence of danger
- Removal of existence of danger conditions
- Relations of security personnel towards clients, employees, and visitors
- Security personnel influence in providing security services
- Conflict management - stressful and conflict situations at security personnel work post
- Conflict escalation through phases
- Phases of constructive management of conflict through phases
- Labor Law specifics for private security companies and their employees
- Security procedures and policies (respect of honor, reputation and dignity, communication, addressing)
- Procedures for regular and emergency situations
- Personal data protection Law
- Law on the prohibition of discrimination
- Law on prevention of harassment at work
- Law on protection on whistleblowers

C. COMPLIANCE WITH THE LAW

According to Serbian law, Article 15 of the Regulation on the Manner and Procedure of Risk assessment in the workplace and working environment (*Official Gazette of RS no. 72/06, 84/06, and 102/15*) MPC Properties is obliged to prepare and keep update of document:

METHODS FOR PERFORMING RISK ASSESSMENT - RISK ASSESSMENT METHODOLOGY USED IN RISK ASSESSMENT - KINNEY METHOD

The effectiveness of the implementation of the risk assessment act is continuously monitored by checking the effectiveness of the measures taken and evaluating the implementation of the measures in order to reduce and eliminate the risk. The risk assessment act will be implemented by the designated risk assessment team. If ineffectiveness of the implementation of the planned measures is identified in the monitoring of the effectiveness of the implementation of the risk assessment act, correction of these measures will be taken. The risk assessment act is subject to change and supplement in all cases provided.

Risk assessment, with respect to dangers and harm, was conducted using the selected method, which requires consideration of the probability in seven possible levels, consideration of the consequences of a possible event, i.e., the severity of the possible damage or improvement to the work in five levels, consideration of the exposure, i.e., the time of exposure of the employees to the dangers and harm in five levels. Based on the established probability, consequences, and exposure, the level of risk was calculated and defined as the product of probability, consequences, and exposure.

The phases and deadlines for risk assessment, taking into account the activities performed within the scope of the company and the specificities of the internal organization are:

- Acquiring data,
- Determining dangers and harms,
- Assessing risks, and
- Determining ways and measures for elimination with a proposal for measures in terms of reducing or preventing risks.

INFORMATION TO THE RISK ASSESSOR - Information to the risk assessment team is provided through direct observation of technical and other documentation available to the ministry, discussions with all internal unit managers, discussions with employees in specific jobs, and active participation of all employees, regular assistants of risk assessment team members.

COORDINATION BETWEEN THE RISK ASSESSOR Coordination between the risk assessor is easily achieved in all phases of the risk assessment act, given that the members of the risk assessment team are regular employees of the Ministry of Labor and Social Policy.

ADDING INFORMATION TO THE RISK ASSESSMENT BY EMPLOYEES

- preparation and processing of checklists,
- conducting interviews with employees,
- active involvement of employees in the risk assessment process

Consultations with Employee Representatives in order to obtain relevant information related to Risk Assessment Results and Preventive Measures

- After the completion of the risk assessment process, all employees will be informed of the results of the risk assessment, the necessary preventive measures

that need to be taken immediately, and the established priorities for measures with the progressive elimination or reduction of deficiencies to an acceptable level."

D. EMPLOYER'S PLAN FOR THE IMPLEMENTATION OF PREVENTIVE MEASURES AFFECTING THE SAFETY AND HEALTH OF EMPLOYEES- COVID 19 MEASURES

The employer plan defines the implementation of all preventive measures for impact on the safety and health of employees, especially those related to the prevention of the spread of COVID-19 infectious disease caused by the SARS-CoV-2 virus. In accordance with the Regulation on the organization of work of employers during the state of emergency ("Official Gazette of the RS", No. 31/2020) of March 16, 2020, the measures from this Plan apply as long as there is a danger of spreading the COVID-19 infectious disease caused by the SARS-CoV-2 virus on the territory of the Republic of Serbia. In order to protect the health of employees from the spread of the coronavirus, taking into account the obligation of the employer to provide employees with work in a workplace and working environment where measures for safe and healthy work have been taken, recommended measures for the prevention and protection of the health of employees from infection and the prevention of the spread of the coronavirus in the employer's premises are given. The employer is obliged to provide employees with the implementation of all preventive measures for the impact on their safety and health, especially those related to the prevention of the spread of the COVID-19 infectious disease caused by the SARS-CoV-2 virus (disinfection and use of protective means i.e. masks and gloves). Employees are obliged to comply with the instructions of the responsible person at the employer and to apply the prescribed or established measures relating to the use of personal protective equipment.

Article 2.

OBLIGATIONS OF ALL PARTICIPANTS IN THE WORKING PROCESS OBLIGATIONS OF THE EMPLOYER

- consistently implement the recommendations of the government of the Republic of Serbia and the Ministry of Health and work in the workplace, organized in accordance with the order on the restriction and ban of movement of persons on the territory of the Republic of Serbia;
- provide sufficient means for maintaining the hygiene of employees and disinfecting the space;
- provide sufficient means for maintaining hygiene and disinfecting transportation means;
- Appoint by Decision, a person with special powers related to the COVID-19 virus caused state of emergency
- provide sufficient quantities, issue for use and control the use of personal protective equipment at work;
- at the entrance to the workplace, display a notice, instructions for prevention and preventive measures related to COVID-19 caused by the SARS-CoV-2 virus;
- at the entrance to the workplace (business premises, reception, registration desk, waiting room, etc.) provide disinfectant-soaked wipes to disinfect shoes;

- at the entrance to the workplace (business premises, reception, registration desk, waiting room, etc.) provide disinfectant means (70% alcohol) for hand disinfection.

At the entrance of the business premises, ensure that disinfectant, masks, and gloves are available for employees upon arrival at work;

- Prohibit employees from gathering in locker rooms, rest rooms, and other areas in groups larger than two during breaks.
- Regularly ventilate work areas.
- Allow smoking outside work areas during breaks;
- Prohibit unnecessary physical contact (handling, hugging, etc.);
- Allow administrative work to be performed from home- if possible.
- Ensure compliance with the ban on holding meetings in enclosed spaces - we suggest holding meetings outdoors in groups at a distance of 2 meters or through video/audio conference calls.
- Ensure enforcement of the measure defining the number of people in enclosed spaces in depending of the size of space - one person per 4 square meters, while maintaining a distance of 2 meters.
- Allow each employee who is a parent of a child under 12 years of age (especially if they are a single parent) to be with their child at home, working exclusively from home using provided laptops and internet.
- Continuously promote and inform employees/workers of the important and necessary obligation of frequent use of the aforementioned disinfectants (primarily frequent hand washing).
- Organize work in such a way as to avoid contact with individuals who are suspected to be infected;
- By organizing work in the business premises, ensure mutual spacing of employees at the workplace in the working environment of at least 2 meters;
- Ensure that employees sit separately, at different ends of the table or work area.
- Inform employees of the potential risk and preventive measures to prevent coronavirus infection in order to protect their health;
- Display written instructions on preventive measures to prevent infection and spread of the coronavirus and proper personal hygiene in a prominent location;
- Regularly check the health of employees and isolate any employee who has health problems or suspects they are infected (based on the employee's personal statement) from the business premises and seek medical assistance in accordance with doctor's recommendations;
- Instruct employees that if they have any respiratory difficulties, weakness, fatigue, shortness of breath, high temperature, and coughing, they should inform their immediate supervisor that they are unable to come to work;
- Organize cleaners to complete the cleaning and disinfection of the business premises before and after work (wiping the floor, keyboards, tables, locks, maintaining toilets, etc.);
- Provide a special bin with a bag and lid for disposing of infected waste;

- Educate employees on measures and obligations related to COVID-19 caused by the SARS-CoV-2 virus, keep records.

EMPLOYEE OBLIGATIONS

- To protect against infection and reduce its spread, it is recommended to wear a protective mask over the mouth and nose (surgical, cotton, with a filter or without) and protective gloves on the way to work at the workplace and when returning from work;
- All employees with symptoms of a respiratory infection such as a dry cough, elevated temperature, and difficulty breathing should not come to work but must stay at home and seek treatment in accordance with doctor's recommendations;
- All employees are required to comply with hand hygiene measures (frequent hand washing with warm water and soap, as well as hand disinfection with alcohol-based products) and wipe their hands with a paper towel that after use is placed in a closed bin or PVC bag that must be tied up;
- Avoid close contact with people who have symptoms of a respiratory infection (coughing and sneezing);
- Avoid handshaking, hugging and kissing upon meeting and maintain a distance of at least one meter during conversation;
- Avoid any contact with other workers at a distance of less than 2 meters;
- Do not touch your eyes, nose, and mouth with unwashed hands;
- If you cough or sneeze, cover your nose and mouth with your elbow or a tissue. Dispose of the tissue immediately in a trash can with a lid and make sure to wash your hands;
- Do not share dishes and cutlery with other people;
- If the dining area is of smaller surfaces, limit the presence of people and organize lunch breaks in several smaller groups;
- Responsibility is necessary for everyone to carry out hygiene-technical preventive measures to protect their own health and the health of others and thus prevent the spread of the coronavirus infection;
- All employees are required to regularly disinfect their work surface (wiping down tables, keyboards, disinfecting hands and other work surfaces).

PREVENTATIVE MEASURES Preventive measures affecting the safety and health of employees, especially those related to preventing the spread of the infectious disease COVID-19 caused by the SARS-CoV-2 virus, are:

- disinfection;
- use of protective measures i.e. masks and gloves;
- maintaining social distance.

DISINFECTION Disinfection refers to procedures aimed at destroying the largest number of unwanted microorganisms. In order to disinfect, the employer has provided various physical and chemical agents, whose effect is to destroy or inhibit the rest of the organism population. Disinfection is applied exclusively outside the living organism, in the external environment (soil, water, air, objects, and premises where the employer's activity is carried out). PROCEDURES FOR GOOD HYGIENIC PRACTICES IN THE CASE OF DISINFECTION OF EMPLOYEES AND VISITORS

- at the entrance to the business premises, display a notice and instructions for preventing the spread, as well as preventive measures regarding COVID-19 caused by the SARS-CoV-2 virus;
- at the entrance to the business premises, place disinfectant-soaked wipers and disinfectant sprays on the counter or table (alcohol 70%, asepsol, sodium hypochlorite-based agents); separately, in boxes, masks and gloves for employees upon arrival at work;
- regularly disinfect transportation equipment
- visibly mark the waste disposal area (used masks and gloves) and treat it as infectious waste, at the entrance to the business premises, provide disinfectants, masks, and gloves for visitors, clients, and business partners upon visits and meetings;
- inform employees about the possible risk and prevention measures to prevent coronavirus infection for the purpose of protecting their health and all new findings, regulations, and decisions made by the government and crisis committees;
- visibly display written instructions on prevention measures to prevent infection and spread of the coronavirus and proper personal and collective hygiene (in the kitchen, toilets, etc.).

Good hygiene practices in case of disinfection of business premises Regularly disinfect the business premises before and after working hours so that all contact surfaces are wiped with clean cloths soaked in disinfectants based on alcohol, asepsol or sodium hypochlorite. Contact surfaces are surfaces that employees come into constant contact with, such as: keyboard, mouse, laptop and desktop computers, printers and other office equipment and furniture, kitchen equipment, toilet, doors, door handles, entrance/exit buttons, handrails and balusters, stairs, lift doors and cabins, buttons and switches, etc. Periodically disinfect the business premises by engaging professional companies (legal entities or entrepreneurs) who have solutions/permits from the competent ministry to disinfect and clean working and auxiliary rooms with professional equipment. USE OF PROTECTIVE MEANS, i.e. MASKS AND GLOVES The use of protective means, masks and gloves, also implies training of employees for proper placement, removal, and use. WEARING MASKS

- Before putting on the mask, wash your hands with warm water and soap or an alcohol-based product;
- Carefully place the mask over your mouth and nose so that there is no empty space between your face and the mask through which air (and therefore the virus) can freely flow;
- Lower the bottom of the mask so that it covers your mouth and chin and shape the upper part to fit your nose and place the elastic straps around your ears.
- When the mask becomes moist or dirty, replace it with a new, clean one;
- Remove the mask by removing the elastic straps behind your ears, holding the mask away from your face and clothing to avoid touching potentially contaminated mask surfaces.
- Discard the mask in a closed bin immediately after use. If you use cotton masks, you can boil, disinfect, and reuse them.
- Be sure to perform hand hygiene after touching and/or removing the mask - wash your hands with soap and disinfect them with an alcohol-based product. WEARING GLOVES
- Gloves are put on after washing and disinfecting your hands;

- Before removing the gloves, disinfect them with an alcohol-based product in the same way as hand hygiene;
- Discard the gloves in a closed bin immediately after use;
- Be sure to perform hand hygiene after removing the gloves - wash your hands with soap and disinfect them with an alcohol-based product.

WORKING IN A CLOSED SPACE - SOCIAL DISTANCING The term "social distancing" refers to the organization of work by the employer in accordance with the following principles:

- Regularly ventilate the space;
- Organize work in the business premises so that a distance of at least 1.5 meters is maintained between employees, clients and visitors;
- Ensure that employees, clients, and visitors wash their hands regularly or use hand sanitizers;
- Avoid physical contact (handshakes, hugs, etc.);
- If possible, work from home;
- Avoid gatherings and crowded spaces;
- Provide employees with personal protective equipment (masks, gloves, etc.) and train them on how to use it properly.
- Penal Measures Employees are obliged to comply with the instructions of the responsible person at the employer and to apply the prescribed or established measures related to the use of personal protective equipment, disinfection, and all other measures and procedures established by this plan. Non-compliance with the instructions of the responsible person at the employer, and failure to apply the prescribed or established measures related to the use of personal protective equipment, disinfection, and all other measures and procedures established by this plan can be considered a serious violation of work discipline, and a valid reason for the employer to terminate the employment contract.
- Organization of work in accordance with this Plan lasts as long as the danger of spreading the infectious disease COVID-19 caused by the SARS-CoV-2 virus exists on the territory of the Republic of Serbia. This Plan comes into force on the day of adoption and is published on the employer's notice board and at every visible place where employees work.