Adastra Global Health & Safety Policy

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ADASTRA

1. Introduction

At Adastra, we believe that the health, safety, and wellbeing of our people are fundamental to responsible and sustainable business.

We are committed to respecting the right to safe and healthy working conditions and to providing and maintaining a safe, healthy, and supportive working environment where individuals are protected from work-related risks and empowered to work safely.

This Policy reflects our commitment to preventing work-related injuries and illnesses, promoting physical and psychological wellbeing, complying with applicable occupational health and safety legislation, and continuously improving our health and safety practices.

Health and safety are integral to our corporate culture and support our broader commitments to human rights and ethical business conduct.

This Policy applies globally to all Adastra employees, contractors, temporary workers, interns, volunteers, and visitors, as relevant to their activities and presence in Adastra workplaces. All individuals covered by this Policy are expected to follow applicable health and safety requirements and instructions relevant to them.

2. Our Commitments

Adastra is committed to:

- Providing a safe, healthy, and supportive working environment.
- Complying with applicable occupational health and safety legislation and regulatory requirements in every country where we operate.
- Identifying, assessing, and mitigating workplace risks through appropriate preventive measures.
- Preventing work-related injuries, illnesses, accidents, and unsafe working conditions.
- Promoting physical and psychological wellbeing as essential components of health and safety.

- Providing appropriate health and safety information, mandatory training, and awareness activities.
- Promoting safe and ergonomic working practices, including remote and hybrid working arrangements where applicable.
- Maintaining appropriate emergency preparedness and workplace safety arrangements.
- Encouraging individuals covered by this Policy to report hazards, unsafe conditions, incidents, and near misses without fear of retaliation.
- Assessing reported concerns and, where appropriate, investigating incidents and implementing corrective and preventive actions.
- Consulting employees and encouraging their participation in maintaining a safe and healthy workplace, in accordance with applicable requirements.
- Continuously improving our health and safety management practices.

3. Global Health & Safety Framework

Adastra maintains a global framework for managing health and safety while recognizing that legal requirements and operational practices differ across the countries in which we operate.

Local Adastra entities are responsible for implementing applicable health and safety requirements in accordance with national legislation, relevant local procedures, and the principles established by this Policy.

Depending on local legal requirements, these measures may include:

- Occupational health and safety information and training.
- Refresher training at intervals required by applicable legislation.
- Home office health and safety guidance.
- Local workplace safety instructions.

- Fire safety training and arrangements.
- Emergency preparedness and evacuation procedures.
- First aid arrangements.
- Workplace risk assessments.
- Appropriate physical security measures to protect individuals, visitors, and facilities.
- Incident and hazard reporting mechanisms.
- Periodic reviews of health and safety risks and legal compliance.

Health and safety risks should be considered in the context of the relevant working environment and activities, including office-based, remote, hybrid, client-site, and work-related travel arrangements, where applicable.

Supporting procedures, training programmes, and workplace documentation are maintained locally and reviewed as required by applicable legislation or business needs.

4. Physical and Psychological Wellbeing

Adastra recognizes that health and safety extend beyond physical safety and include psychological wellbeing.

We are committed to fostering a respectful, inclusive, and supportive working environment where individuals feel safe, valued, and empowered to contribute.

We strive to prevent psychosocial risks, including excessive workplace stress, harassment, discrimination, bullying, violence, and other behaviours or working conditions that could negatively affect wellbeing.

These commitments complement Adastra's broader commitments to human rights, dignity, equality, inclusion, and respect.

Where available, individuals covered by this Policy are encouraged to make use of relevant health, safety, and wellbeing resources provided by Adastra or available through applicable local arrangements.

5. Education and Awareness

Adastra believes that education and awareness are essential elements of an effective health and safety culture.

Individuals covered by this Policy receive health and safety information and training appropriate to their activities, responsibilities, working environment, and applicable legal requirements.

Depending on local legislation and operational needs, training and awareness activities may include:

- Occupational health and safety.
- Fire safety.
- Home office safety.
- Physical security.
- Local workplace safety instructions.
- Emergency preparedness and evacuation procedures.

Individuals covered by this Policy are expected to familiarize themselves with applicable health and safety instructions and complete any mandatory training relevant to them in accordance with local legal and organizational requirements.

6. Roles and Responsibilities

6.1 Leadership and Management

The Executive Leadership Team retains overall accountability for this Policy.

Managers and leaders are responsible for supporting its implementation within their areas of responsibility by:

- Promoting a culture of health, safety, and wellbeing.
- Supporting compliance with applicable health and safety requirements.
- Supporting the completion of mandatory training.
- Identifying and addressing workplace risks within their areas of responsibility.
- Encouraging the reporting of hazards, incidents, and opportunities for improvement.
- Supporting appropriate follow-up and corrective actions when health and safety concerns arise.

6.2 Local Entities and Designated Functions

Local management, Human Resources, Office Management, and other designated functions support the implementation of this Policy within their respective countries and business units.

They are responsible for supporting the application of relevant local requirements, procedures, and health and safety arrangements within their assigned responsibilities.

6.3 Individuals Covered by This Policy

All individuals covered by this Policy are expected, as relevant to their activities and responsibilities, to:

- Follow applicable health and safety requirements and instructions.

- Complete mandatory health and safety training where required.
- Follow relevant workplace safety and emergency procedures.
- Use company equipment responsibly and safely.
- Report hazards, unsafe conditions, incidents, accidents, or near misses without unnecessary delay.
- Cooperate, where appropriate, with efforts to assess and address health and safety risks.
- Contribute to maintaining a safe, healthy, and respectful working environment.

7. Reporting Concerns and Incidents

Adastra encourages all individuals covered by this Policy to report health and safety concerns, hazards, unsafe conditions, incidents, accidents, or near misses through established local reporting channels.

Reports are handled appropriately and confidentially, to the extent possible and in accordance with applicable laws and internal procedures.

Adastra prohibits retaliation against anyone who raises a health and safety concern in good faith, participates in an investigation, provides relevant information, or acts as a witness in connection with a reported concern.

Reported issues are assessed and, where appropriate, investigated to identify contributing factors and determine suitable corrective or preventive actions.

Where necessary, significant incidents and unresolved risks are escalated to the relevant responsible functions or management in accordance with applicable local procedures.

8. Governance and Continuous Improvement

Adastra is committed to maintaining this Policy as a living document that evolves with changing legal, operational, and organizational requirements.

The Executive Leadership Team retains overall accountability for this Policy. Human Resources is responsible for maintaining the Policy and coordinating its periodic review and updates, in collaboration with relevant stakeholders where appropriate.

This Policy shall be reviewed at least annually or whenever significant legal, organizational, or operational changes occur. Health and safety performance and the effectiveness of relevant arrangements are reviewed through appropriate activities, which may include risk assessments, training records, incident reporting, internal reviews, and follow-up of corrective and preventive actions.

9. Related Policies and Supporting Documentation

This Policy should be read together with applicable Adastra global and local policies, procedures, guidelines, and other supporting documentation relating to:

- Human rights, ethical conduct, and respectful workplace practices.
- Occupational health and safety.
- Physical security.
- Home and remote working arrangements.
- Fire safety and emergency preparedness.
- Workplace safety instructions.
- Incident reporting and investigation.

Local entities should refer to the relevant documentation applicable to their jurisdiction and operating environment.

10. Final Statement

Protecting the health, safety, and wellbeing of our people is a shared responsibility and an essential part of who we are as a company.

Beyond complying with applicable legal requirements, Adastra is committed to creating working environments where individuals feel safe, respected, supported, and empowered to perform at their best. By integrating health and safety into our culture, decision-making, and daily operations, we strengthen our business resilience, support sustainable growth, and contribute to a responsible and ethical workplace for everyone.