

Chapter	EV.01.06
Type of document	Form
Document	EV.01.06-F.01
Management review HSE policy	
Version date	28/02/2024

## Executive assessment Management system VCA\*\* 2017/ 6.0

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### Date of review:

- 28/02/2024

### Foreword

With this management review, the management of EnergyVision wants to show employees and interested parties the developments in the field of safety, health and environment. In addition, through this management review, the board wants to give an opinion on the effective operation of the HSE management system.



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## 1 Results of previous management reviews

In May 2021, EnergyVision became VCA\*\* certified. A second control audit was scheduled last year, which was successfully passed. Previous management review concerns the assessment after the second control audit and the evaluation after 2 years as a VCA\*\* certified organisation. This was held after the internal audit of the SCC management system.

Listed below are the key elements from previous management review:

- A level II prevention adviser has since been appointed
- HSE awareness programme reducing absenteeism started in 2023
- An equipment manager was appointed to get this under control and properly recorded
- The number of workplace accidents and frequency rate was well below targets and sector averages
- High customer satisfaction (86%)

### 1.1 Decision

The third management review was conducted about two years after obtaining the SCC\*\* certificate. The SCC system was further developed and meanwhile the processes and procedures become more and more established and the organisation is imbued with the SCC principles, despite a strong growth in staff and scope of activities.

The organisation provides sufficient resources and time for the further development and implementation of the HSE policy. The many internal training and team moments are a good example of this.

As key action points for the year 2024, the internal audit revealed that the entire organisation should focus on the following aspects:

- HSE awareness of respect for material better disseminated and monitored
- Reducing absenteeism

These elements will also be addressed in the 2024 management review.

### 1.2 Actions:

All EnergyVision employees will be informed of the content of this management review and this report will be made available to the organisation.



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## 2 Results of the internal audit VCA\*\* 2017/6.0

Executed on 27/02/2024

### Score vragen

		<u>Max aantal</u>	<u>Gescoord</u>
Mustvragen		27	27
Aanvullende vragen	(benodigd: 4)	8	5

The internal audit shows that the SCC\*\* safety system is well monitored and complied with. The result is positive. All must-questions were passed and regarding the additional questions, scores are also above the required threshold.

All SCC and safety documents were reviewed and revised and a site visit was carried out to verify the presence of the necessary documents, registrations and inspections.

Observations from the previous internal and external audits have been addressed in 2023 and additional procedures and registration lists have been created to monitor the company's continued growth.

Some documents still need to be updated, completed or uploaded. This was immediately communicated to the necessary departments and managers. It is important that all SCC and safety documents are always consultable in their latest version and that all assurance lists are always up to date.

As main areas for improvement following the internal audit we note:

- SCC and safety documents should always be requested when subcontracting and regularly checked for compliance with all SCC requirements.
- Follow-up list of work materials, resources and PPE should be further updated.
- From 2024 conduct trend analysis on periodic workplace inspections via digital application.
- Risk assessments should be further extended to new tasks, work items and situations in 2024 and should comply with applicable laws and regulations.
- Temporary organisation working with for sending out operational workers should become VCU-certified as soon as possible.



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### 3 Results of the external audit VCA\*\* 2017/6.0

The VCA\*\* audit was carried out on 08/08/2023 by auditor Annick Willems. The audit report can be found as an appendix to this report.

Scope : Installation and maintenance of solar panels in Belgium.

The certificate 21 SMS 2727R1, granted and approved on the date of the decision taken, remains conditionally valid until 9 May 2024.

The overall assessment can be found below.

## Algemene beoordeling van het beheersysteem

De geauditeerde organisatie heeft een beheersysteem opgezet en ingevoerd volgens de eisen van de referentienorm. Tijdens de audit werd de documentatie en de toepassing van het systeem geverifieerd. Het auditproces was gebaseerd op een steekproef van de beschikbare informatie.

### Algemeen oordeel van de auditor over het VGM beheersysteem

Er is een veiligheidsmanagement aanwezig . Het bedrijf kent groeipijnen waaraan gewerkt wordt . ( veel nieuwe medewerkers)

Het beschreven en ingevoerd beheersysteem beantwoordt aan de van toepassing zijnde eisen van de referentienorm met uitzondering van:

- 13 aandachtspunten

Een gedetailleerd overzicht van de observaties (positieve opmerkingen, opportuniteiten voor verbeteringen en afwijking(en)) is terug te vinden in volgende hoofdstukken.

### Conclusie en aanbeveling

De doelstellingen van de audit zijn behaald.

De hoofdauditor adviseert de certificatiecommissie het behoud van het (de) VCA\*\*2017/6.0 certifica(a)t(en) voor de geauditeerde organisatie.



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## 4 Evaluation of objectives

Evaluation of the achievement of HSE objectives/associated targets and action programme. All targets are recorded and discussed with EnergyVision employees and periodically during the year, consultation moments are held where the status of these targets are discussed with the employees concerned.

### 4.1 Quantitative targets

The table below shows whether or not the quantitative objectives were achieved. The targets are always set/monitored using the SMART principle (SMART = Specific, Measurable, Demonstrable, Realistic, Time-bound). In 2022, the quantitative targets were not met, but the frequency and severity levels dropped dramatically. **The absolute target remains 'Go for 0'** and efforts will continue to be made annually to reduce workplace accidents.

A detailed overview of these objectives (results, resources, actors, responsible parties, etc.) can be found in KPIs and objectives, as well as in the table below:

Objective: Performance, safety and health of employees			
Objective	Treshold	Result (result 2022)	Reached
Number of lost-time industrial accidents	≤ 2/j	3 (7)	NOK
Number of occupational road accidents	≤ 2/j	0 (1)	OK
Number of environmental incidents	≤ 1/j	0 (0)	OK
Number of security incidents (near misses)	≤ 4/j	16 (2)	NOK
Severity level	≤ 0,7	0,03 (0,58)	OK
Frequency rate	≤ 23	14,58 (43,74)	OK

### 4.2 Qualitative objectives

The table below sets out some key qualitative objectives set by EnergyVision to improve the safety and environmental aspects of its operations. These qualitative objectives are specific, demonstrable and realistic, but not always measurable nor time-bound, as they are qualitative objectives aimed at continuous improvement.

#### Qualitative objectives

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General objective	Achieved?
VCA** control audit	OK
Roll-out of HSE awareness programme reduction of absenteeism	NOK
Further roll-out of materials management organisation	OK
Inventory and check first aid kits	OK
Hazardous product inventory	OK

### 4.3 Decision and actions

#### Quantitative targets

Quantitative targets were not met in 2022. The number of workplace accidents and frequency rate was well above the targets and sector averages. The 2021 sector averages were used for this purpose. Therefore, to drastically improve these scores with the goal of 'Go for 0', the HSE awareness programme was rolled out in 2023 to reduce the number of accidents. Incidentally, this topic is raised and gone over at every team meeting in order to continue to convey its importance.

Looking at the results, we see that the number of workplace accidents has been significantly reduced, but we are still above the target. However, it is important to note that 2 out of 3 workplace accidents happened at the same location and time. Both the Frequency Rate and Severity Rate are below the target and below the sector averages (the 2022 sector averages were used for this purpose to frame them).

The number of security incidents increased drastically, but important to give interpretation to this is that this year the focus was on increasing the number of reports in order to correctly apply Heinrich's iceberg principle. To ensure that there would be more reports, a new system was devised.

We must, of course, remain committed to reducing accidents and incidents. This remains an ongoing focus and process.

#### Qualitative objectives

Looking at the qualitative targets, it can be said that we scored well there.

The VCA\*\* control audit in 2023 went smoothly and the certificate was retained. Materials management was further fine-tuned and the processes are becoming established. Maintaining and expanding the system remains an ongoing process. Furthermore, the inventory of first aid kits and hazardous substances was started and completed. Some new procedures and processes were created in 2023 to raise HSE awareness and increasingly focus on assurance and reporting.

One downside is that the 2023 awareness programme on absenteeism did not achieve its intended goal, despite many efforts throughout the year. Therefore, efforts on this will continue in 2024.



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## 5 Accidents

### 5.1 Near Misses and incidents without leave

Whereas we received 2 reports in 2022, 16 incidents were recorded in 2023. Active efforts were made in 2023 to increase the reporting and registration of all incidents and unsafe situations. Although the number increased, we still see this as a positive evolution that many more were reported in 2023. An accessible procedure for all employees was created and its importance was raised at the various team meetings.

Within the company, there is no longer suspicion towards reporting unsafe situations, but everyone now actively cooperates to make the working environments safer.

### 5.2 Accidents with furlough or substitute work

In 2022, 7 lost-time accidents were recorded. In 2023, there were only 3. The 2022 HSE awareness programme set up achieved its set target in 2023. Both the Severity Rate and Frequency Rate are below targets and below industry averages (from 2022, 2023 figures not yet available). It is also important to point out that 2 of these 3 workplace accidents are actually one and the same accident that occurred at the same location and at the same time to 2 workers. The absence from work following these workplace accidents was also only 1 day. In 2023, there were no serious workplace accidents and no work-related injuries to and from work. Despite these decreases, our overall objective remains 'Go for Zero' and we hope to break out with 0 workplace accidents or first aid incidents one of the coming years.

The MUOPO analyses of accidents also tell us that most of the causes are due to human aspects (behaviour and expertise) and organisational aspects (failure to follow existing procedures and instructions).

#### Decision and actions:

Campaigns in recent years on safety have borne fruit and reduced the number of accidents, Severity Rate and Frequency Rate. The number of reports has risen sharply due to the establishment of a new accessible procedure. The objective, of course, remains to aim for 0 workplace accidents. Repetition, sensitisation and follow-up are the code words here. We remain on the right track!

## 6 Evaluation of risk assessments

At the end of 2023, the risk analyses were reviewed and evaluated in collaboration with Mensura's external prevention advisor. For each job, it is determined which risk analyses apply and which level of workstation is involved. The risk analyses themselves can then be found in separate files. In this way, it remains clear and is very easy to expand. In the coming years, active efforts will be made to expand the number of risk analyses with the appointment of a Level II internal prevention advisor.

Our risk analyses can be accessed via the server and these risk analyses are reviewed on a regular basis. Employees also provide input regarding risks when performing their duties.



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## 7 Results arising from workplace inspections

### 7.1 Workplace inspections carried out by employees EnergyVision

The table below lists all the function of employees who carry out workplace inspections. These functions can be operational functions as well as administrative functions because EnergyVision believes that when employee perform workplace inspections, it contributes to increasing safety culture among both internal and external employee.

In general, we see that workplace inspections are carried out consistently and the number is well above targets. Executive managers are also regularly assessed on this during evaluation interviews; workplace inspections are part of their KPIs.

Overview table workplace inspections employees		
Function	Objective	Result
COO	4	9
HSE coordinator	12	12
Project Managers	60	97
Site managers	12	54

### 7.2 Trend analysis workplace inspections

No trend analysis will be conducted on workplace inspections for now.

Recurring action points from the workplace inspections carried out are, however, analysed by the IDPBW and recorded with the relevant person in charge.

## 8 Corrective and preventive measures (CAPAs)

The internal audit was recently conducted in which the non-conformities from this internal audit were recorded as CAPAs. Furthermore, no accidents or environmental incidents were recorded so no additional CAPAs were created.

## 9 HSE awareness and behaviour programme

The HSE awareness programme was committed to reducing absenteeism and establishing an absenteeism policy in 2023.

The programme that was gone through is summarised below:

- January:
  - Mention of new HSE awareness campaign at team meeting.
- February:



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- Elaborate attendance policy procedure.
- March:
  - Kick-off and communication on the most common causes and reports at team meeting and training day
  - Explanation and background on attendance policy and procedure for absenteeism at departmental meetings + collect feedback
- April:
  - Implementation Vitality Scan
- May:
  - Communication results Vitality scan + action plan at team meeting
- September:
  - Communication and registration 3 workshops: Power of Sleep, Increase Resilience, Stop Smoking
- October:
  - Durbuy team event: activities in the framework of the HSE programme
- December:
  - Communication final figures and conclusion awareness campaign at team meeting

Unfortunately, it had to be noted that despite the campaign, workshops and many other efforts around absenteeism policy, absenteeism rates have increased in 2023 compared to 2022 and are also well above the average in Belgium.

So this will also require continued efforts in the coming years.

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## 10 Resources

EnergyVision management has provided the necessary resources to promote internal prevention, operational prevention for service, projects and temporary and mobile construction sites.

### 10.1 Safety inspections and controls

Equipment is inspected annually. Work equipment is checked itself through internal checks. A competent person was appointed internally for this purpose. Other work equipment requiring inspection by an external agency was inspected externally. Below is a brief overview of the internal and external checks and inspections.

### 10.2 Internal control of work equipment

All work equipment is managed and safeguarded on a central safeguarding list. This list can be found on the server and includes all work equipment that must undergo an annual internal inspection.

When a work equipment is approved, it receives the marking with a colour code of the corresponding year. This makes it clear to everyone that this equipment can be used. When the equipment is rejected, it is taken out of circulation and repaired or replaced with a new one.

This procedure works and is well implemented. However, continued attention is needed to maintain the system. To this end, a materials manager was specifically appointed in 2023 and new procedures were drawn up to ensure that the management, safeguarding and inspections of all work equipment continue to be correctly monitored.

### 10.3 External inspection of resources

A safeguarding list is available listing all work equipment that must undergo an external inspection by a recognised inspection body. This list can be accessed via the server.

The frequency of external inspections is carried out according to the type of work equipment (annual or quarterly). A mark is placed on the work equipment and inspection certificates are kept on the server. Rejected equipment is taken out of circulation or repaired.

There are no further comments to report on this. The external inspections were carried out timely and correctly.

## 11 HSE policy statement

The HSE policy statement was updated on 17/11/2022 and remains current today. This amended version was approved by the managing director and the HSE coordinator. The policy statement was subsequently communicated internally to all employees via mail. The approved, dated and signed policy statement is available for consultation on the server and hangs out in the offices.

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## 12 Internal and external training

Training is tracked in a training matrix, this document is under the management of the organisation department and monitored by internal training coordinator Nicolas Dingens.

The matrix is a living document that is continuously updated and supplemented. Based on this matrix, records are kept of the training courses attended. Expiry dates of attestations and certificates are registered and thus employees can be targeted for training.

### Decision and actions:

The matrix is up-to-date and is used as a working document to send everyone on training courses in good time. Nicolas Dinges is responsible for this and is supported by the internal prevention advisor regarding advice on training per workstation and/or function. EnergyVision pays a lot of attention to the training and education of its employees and naturally offers all legally required training courses to its employees. This both internally in the organisation and externally through organisations and training centres. Continuous follow-up and maintenance is necessary.

## 13 Customer satisfaction

In this article, we summarise the positive and negative feedback we have received from our customers in terms of quality and HSE. Our marketing department could not send out satisfaction surveys in 2023 for various reasons. This year, a digital platform 'Freshdesk' was developed that will be accessible to all EnergyVision customers from 2024.

However, there is obviously consultable mail traffic from which some quotes can be seen below.

### 13.1 Positive feedback from our customers

*“In 2023 installeerde EnergyVision voor ASTER zo'n 60.000 zonnepanelen op sociale huurwoningen, van Veurne tot Maaseik. Zowel bij de voorbereiding als bij de uitvoering, maar ook bij het onderhoud en de opvolging van de installaties toonde EnergyVision dat het bedrijf flexibel, snel en correct kan inspelen op vragen van haar klanten. EnergyVision toonde zich een betrouwbare partner voor de verduurzaming van sociaal wonen in Vlaanderen.”*  
Sven Van Elst, algemeen directeur ASTER

*“Eind vorig jaar heb ik de uitbreiding op het Openbaar Pakhuis samen met Abedin opgeleverd. Zoals gebruikelijk was de kwaliteit van afwerking heel hoog en daarom waren ook zeer weinig opmerkingen, nogmaals proficiat aan de projectploeg.”*  
Tim Van Dorpe van Nextensa (Energy Manager Gare Maritime)

*“Eén woord: white glove service, vanaf het eerste contact tot en met de oplevering en ingebruikname. Exemplarisch voor de sector.”*  
Angelo Vanhaelewyn, bestuurder PURE Pharma

This is just some of the arsenal of quotes from satisfied customers, indicating that we at EnergyVision hold and will continue to hold the satisfaction of our customers in high regard.



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### 13.2 Negative customer feedback

Of course, there are also times when certain customers are not satisfied or where there is room for improvement. Communication is crucial here and is therefore highly appreciated. After all, we enter into a long-term relationship with our customers, who are our first-line ambassadors.

### 14 Assessment of suppliers and subcontractors

Our main suppliers and subcontractors are assessed annually in terms of HSE performance. This assessment is part of the annual ISO evaluation of partners, suppliers and subcontractors. The comprehensive overview can be found on the server. Below is the extract of subcontractors and partners who have received an HSE assessment:

Name supplier	Type of partnership	Use of equipment	Certificate	PPEs	Waste management	Communication	Average score	Remarks
<b>ABB</b>	subcontractor Drive	2	3	2	2	3	<b>3</b>	We are no longer in contact with the ze party. The latter has only been contacted to remove Jette's fast-charging pole.
<b>Alpha Housing</b>	subcontractor B2C	3	2	3	2	3	<b>3</b>	Collaboration started in summer 2023. Start-up period was intense, they had a habit of installing in their way. Week by week there was improvement and regular evaluation. An EV site manager was provided with each team from Alfa Housing to train them.
<b>MOT</b>	subcontractor Drive	3	4	3	3	2	2	Overall definitely ok, but administratively weaker. There could be more communication about the state of affairs.
<b>Fiers</b>	B2B subcontractor	3	3	3	3	3	<b>3</b>	Overall ok but highly dependent on which teams they send sometimes.
<b>Group Delta</b>	subcontractor Drive	3	3	2	2	3	<b>3</b>	Wearing PPE in devices is not always followed up, during or after a



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								project, material lying around is sometimes a comment
<b>Gutami Solar</b>	subcontractor B2C	1	1	2	1	1	<b>1,2</b>	Collaboration stopped September 2023 due to poor scores.
<b>Indulek</b>	subcontractor B2B & Drive	3	3	3	3	3	<b>1</b>	Substandard in communication. Late sending out of offers inspection reports, ....
<b>Isoroof</b>	ASTER subcontractor	2	2	3	3	2	<b>2,4</b>	Speed of response/solution is often quite dependent on which PM is asking. Already running better. Also seen much improvement in terms of installation. Use of AWP's not always correct. Certificates not demonstrable by all.
<b>Musiqi</b>	B2B subcontractor	3	4	3	3	3	<b>3</b>	Are called in for small jobs (wall masonry, ditch digging, ...) where certificates are not applicable.
<b>Neodak</b>	B2B subcontractor	3	3	3	2	2	<b>2</b>	Only 2 projects worked together but littering and difficult communication with site management were both the case.
<b>Smartsolis</b>	B2B subcontractor	3	3	3	3	3	<b>3</b>	No comments.
<b>VB Tec</b>	subcontractor Assets	3	3	3	3	2	<b>2,8</b>	Communication does not always run smoothly. Also no projects on ASTER for a while, busy again since 11/03.

## Decision and actions:

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Overall, we can conclude that only one subcontractor underperformed. The cooperation with this subcontractor was therefore terminated. The cooperation with ABB was also terminated due to substandard product performance. With some subcontractors, communication is difficult and follow-up meetings were scheduled to improve quality and communication.

A number of observations were formulated and should be followed up by the respective project departments. In case of repeated problems or incidents, it should be evaluated whether further work can be done with the party concerned.

## 15 Final conclusion

EnergyVision values the safety and health of its employees and operational partners. It is the number one priority and this safety awareness permeates within the all ago of the organisation. 'The Safe Way, is the Only Way'! This strong awareness also came out strongly during our first and second surveillance audits conducted in 2022 and 2023. The results were positive across the board and the SCC\*\* certificate was successfully renewed in both cases. The appointment of an internal prevention advisor to accompany the company's continued growth was also successfully achieved in 2023.

The processes and procedures are in place but do not remain a dead letter. The safety programme '*reducing accidents at work*' was spearheaded in 2022 to sharply reduce the accident rate, but continued in 2023 and its importance continued to be explained at various times. This led to a sharp drop in workplace accidents, severity rate and frequency rate. The number of reports of unsafe situations rose significantly, allowing for continued sensitisation, accountability and follow-up of operational processes. Our absolute objective remains: We Go For 0!

Continued investments will be made to make EnergyVision an ever safer and healthier environment. Further optimisation and organisation of material management, health care for our employees, more preventive safety checks on our projects and construction sites, ... are just a few of the actions further on the agenda.

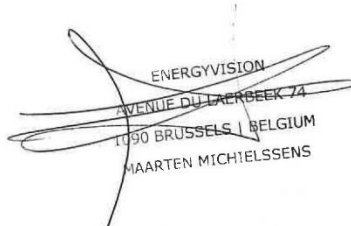
Only through these continuous improvements and optimisation can we maintain our high level of quality and safety. And our customers feel this, as evidenced by high customer satisfaction. Our partners feel this, as evidenced by positive supplier ratings. And above all, our own employees feel this, day in, day out. They are the beating heart of our company and together build the reliable, high-quality and safe partner that EnergyVision wants to be.

Maarten Michielssens

GROUP CEO EnergyVision

Elias Pittoors

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