



HEALTH, SAFETY AND THE ENVIRONMENT

Annual Report 2024



The Tinfos I power station
employed on the lower
steps Photo; Marianne
Kanstad.

Health, Safety, and the Environment Annual Report 2024

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Summary

2024 marked an important change in Tinfos' HSE structure when the new Working Environment Committee (AMU) replaced the previous HSE Committee. At the same time, the role of the safety delegates was strengthened through the establishment of three safety delegates for operations, projects, and administration/abroad, respectively. The chief safety delegate has a permanent place in the AMU, which ensures a direct link between the operational safety delegates and the strategic HSE work.

The operations department conducted two safety rounds during the year. With main focus aimed at risk assessment related to third-party interaction and employee safety, as well as mapping and improving ergonomic working conditions during heavy lifting. The latter was conducted in collaboration with the Corporate Health Service.

Tinfos wants a uniform practice of HSE in all our projects, and in 2024 this involved new HSE requirements for Norwegian and Indonesian projects as well as exchange of experience with colleagues from Indonesia.

Tinfos has a goal that no employees or employees of our suppliers should incur injuries that result in absence from work, and this ambitious goal was realized in 2024.

In terms of deviation management, Tinfos reached its defined KPI for 2024. This involved an active identification of a minimum of 200 nonconformities, of which 80% were processed within one month.

The implementation of the non-conformance module in Netpower has increased Tinfos' ability to conduct in-depth analyses, generate detailed reports and overview of a wide range of risk factors. Analyses show that lack of security and weather conditions are the underlying causes of many of non-conformities and will thus be a theme that will be used as a basis for future risk assessments in connection with development projects.

To ensure safe handling of chemicals, a new digital substance register was established in the autumn of 2022. This was thoroughly updated with all known substances managed in Tinfos during the summer of 2023. In 2024, the focus has been on adding all new substances on an ongoing basis and updating the system.

Alexandru Titi Georgescu
Chief safety delegate

Marianne Kanstad
HSE responsible

Asgeir Drugli
Chief Sustainability Officer

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1 INTRODUCTION

The Working Environment Act and the Internal Control Regulations contain requirements for the enterprise's own activity regarding systematic HSE work. The HSE annual report is our tool for ensuring compliance with this requirement. The report contains links to relevant procedures, instructions and overviews that are stored in our quality system Netpower. The report presents an overview of key data and key figures that reflect the company's HSE work throughout the year. The objective of this HSE report is:

- **Ensure compliance with laws and regulations:** The report must document that the company meets the requirements of relevant laws and regulations.
- **Goal attainment and improvement measures:** Assessment of whether the set HSE goals have been achieved and identify areas where HSE work can be improved.
- **Results from non-conformance processing:** Present the results and analysis of non-conformance processing conducted in the previous year.
- **Risk management:** Refer to risk assessments and identify measures to reduce the risk of injuries, accidents or working environment-related incidents.
- **Updating HSE documentation:** Ensuring that all HSE documentation is up-to-date and available to employees.
- **Action plan for the coming year:** Present an action plan with concrete measures for the coming year.

In 2024, the HSE committee was replaced by a working environment committee (AMU) and several safety delegates have been established. Changes have also been made to the content, where both the overview of the organisation of HSE work and waste management has been moved out of this report. A detailed overview of the Norwegian role description is provided in the Norwegian document "[General HSE instructions](#)" and ensures that the information is updated at all times with regard to any changes in roles/responsibilities during the year. Waste management is now reported in the publicly accessible Sustainability Report.

To ensure robust management endorsement of the company's systematic HSE efforts, this annual report is submitted to the management team for review and deliberation. Following this process, the CEO is responsible for approving the report and ensuring its accessibility to all employees. The annual report is distributed via our intranet.

Tinfos wants a uniform practice of HSE in all our projects, and in 2024 there were two topics in particular that were relevant to safeguard this. One is new HSE requirements for Norwegian and Indonesian projects, respectively. The second is the exchange of experience, and in connection with this, 4 colleagues from Indonesia came to visit Norway in September 2024. The visit included inspections at Norwegian hydropower plants, risk assessments and practice in construction and project management. To further strengthen HSE work, a visit to Indonesia is planned for January 2025, where the aim is to assist with the coordination and implementation of effective HSE measures in the ongoing Nagajaya project. This mutual exchange of experience is a key part of Tinfos' strategy to ensure a close-knit organisation across geographical, cultural, and linguistic barriers. The annual report is translated into English and distributed to all employees in Indonesia.

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2 HSE ORGANISATION

Tinfos' HSE organization underwent adjustments in 2024, driven by an increased internal capacity for ESG and HSE support in both Norway and internationally since late 2023. This expansion has led to more frequent inspections and enhanced follow-up across all projects. Concurrently, rising international demand for ESG expertise throughout 2024 further shaped our overall HSE resource allocation.

Our objective is to align Norwegian and international project HSE structures and procedures as much as possible, a goal largely achieved through common internal guidelines, non-conformance handling, and HSE requirements. However, inherent differences in regulatory frameworks, team sizes, communication methods, risk profiles, and cultural contexts necessitate some organizational distinctions between our Norwegian and international operations. Notably, Norwegian HSE encompasses existing hydropower plant operations, unlike in Indonesia currently. This divergence is reflected in separate HSE organizational structures for Norway and international projects.

As of year-end 2024, Tinfos AS in Norway employed 34 individuals, while PT Tinfos Hydropower Solutions in Indonesia had 10 employees. Tinfos PowerTech AS and Tinfos Entreprenør AS currently have no employees. Comprehensive organizational charts, including detailed HSE structures, are [available digitally in Netpower](#) (refer to Figure 1 for a visual overview).

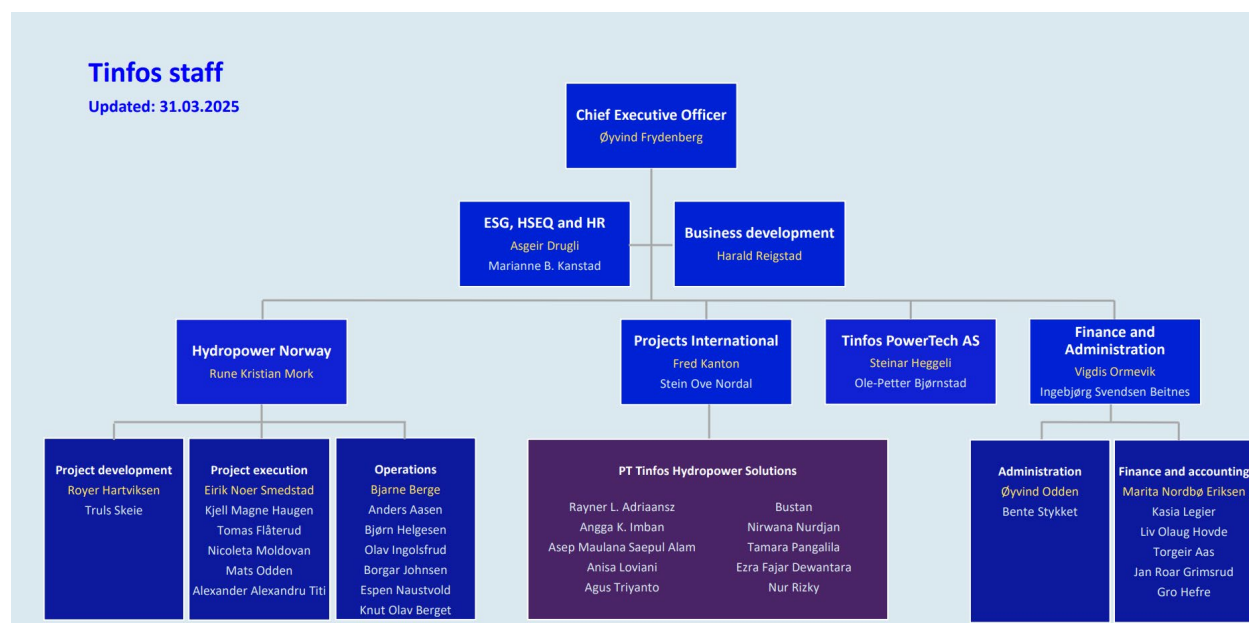


Figure 1 Organizational chart for employees in Tinfos AS

All employees at Tinfos are responsible for their own HSE situation and shall contribute to a safe and inclusive working environment based on the company's goals, obligations, and ethical rules. Each employee must perform his or her duties in such a way that his or her own and others' safety is safeguarded in the best possible way and include consideration for nature, the environment and material values.

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As an employee of Tinfos, you have a special responsibility to report nonconformities in the company's nonconformance system when you discover conditions that pose a risk of harm to people, the environment or society. In relation to the topic of ESG, this also applies to corporate governance.

All Tinfos employees have the right to stop work that entails an undue risk that damage to people, the environment or material may occur.

The employee reports to their immediate superior.

2.1 HSE responsibility in Norway

This annual report contains an overview of roles associated with employees' special HSE responsibilities based on positions of trust and/or responsibilities based on competence. The document [HSE Policy](#) constitute the core documents in the company's systematic work with HSE. This is something all employees should be familiar with.

The management has an annual review of procedures and routines, to ensure that the documents in the quality system are updated and relevant to the company's activities.

HSE responsibilities in the Operations Department and the Project Department are slightly different. For the Operations Department, this means that the Power Plant Manager must ensure that the operation of power plants, including control of electrical installations and electrical equipment, is conducted in accordance with HSE requirements laid down in the electricity and watercourse legislation.

For the Project Department, this means that project managers must ensure the implementation of [Tinfos HSE requirements](#) in all development projects. This document forms the basis for HSE work in all of Tinfos' Indonesian projects, where HSE responsibilities in the projects are also described. This is a document that all employees in the project department should be familiar with.

2.2 Employees' specific HSE roles

Working Environment Committee

From 01.01.2024, the Working Environment Committee (AMU) replaced what was previously called the HSE Committee based on amendments to the Working Environment Act. The Working Environment Committee has an overall responsibility for ensuring a fully satisfactory working environment in the enterprise and involves, among other things:

- **Participate actively in the planning of safety and environmental work:** The committee must be involved at an early stage in processes that affect the working environment.
- **Closely monitor the development of the working environment:** The committee will monitor and analyse the working environment to identify potential areas for improvement.
- **Perform tasks in accordance with the Working Environment Act and the Regulations on Organisation, Management and Participation:** The Committee shall ensure that the enterprise operates in accordance with applicable laws and regulations.

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The employer and employee must have an equal number of representatives on the committee. The committee should consist of at least four and preferably no more than eight members and should represent diverse groups in the enterprise. The occupational health service must be represented in the committee.

The AMU reports to the CEO.

Safety delegate

The role of the safety delegate is to safeguard the interests of employees in matters relating to the working environment. They must ensure that the activities are organised, and the work is conducted in a safe manner, in accordance with the Working Environment Act. The safety representative must ensure that the employer considers the safety, health, and welfare of employees, contribute to the prevention of accidents and injuries and ensure a good psychosocial working environment.

The safety delegate has a number of rights and obligations under the Working Environment Act. The safety representative is entitled to:

- Participation in the planning and implementation of measures that are important for the working environment.
- Access to all relevant information about the working environment in the company
- Training in working environment work.

The safety representative has a duty to:

- Safeguarding the interests of employees in matters relating to the working environment
- To participate in the collaboration with the employer on the working environment
- To follow up the working environment legislation

If there is an immediate danger to life or health, the safety delegate has the statutory right to stop the work, Working Environment Act §6-3.

As of the calendar year 2024, Tinfos has established one safety representative for operations, one for projects and one for administration/abroad. Safety delegates are elected by employees and organized with the chief safety delegate who is the coordinator for the safety delegates and a permanent member of AMU. The chief safety delegate is elected by the local groups of the employee organisations Electricity and IT, NITO, and Tekna.

Fire Protection Manager

The role of the fire protection manager is to ensure fire safety, cf. the Fire and Explosion Protection Act and the Regulations on Fire Prevention through the coordination and facilitation of activities that make up the total fire protection in Tinfos, including the organisation of HSE activities in the fire safety area. The fire protection manager represents Tinfos in the preventive area, is the company's representative to the fire service.

The fire protection manager reports to the Power Plant Manager.

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Emergency Response Manager

The emergency manager is appointed by the CEO and is responsible for Tinfos overall emergency preparedness activities, cf. the Power Emergency Preparedness Regulations, regarding planning and execution of emergency preparedness work.

The emergency manager reports to the CEO.

Water Resource Technical Manager (VTA)

The role of the Water Resource Technical Manager is defined basis on the Regulations relating to safety at watercourse facilities (Dam Safety Regulations). Among other things, VTA is responsible for following up safety at the watercourse facilities by preparing and keeping up to date an internal control system for the watercourse facilities. For watercourse facilities in consequence classes 2, 3 and 4, a deputy VTA with satisfactory qualifications shall be appointed. The deputy VTA will take over the professional responsibility as VTA for the relevant facilities during the functional period.

- VTA for Tinfos' watercourse facilities is Øystein Fehn, class 2 (hired resource)
- Deputy VTA for Tinfos' watercourse facilities is Bjørn Helgesen (Station Manager power plant), class 1.

VTA reports to the head of watercourse facilities (cf. Dam Safety Regulations) as for Tinfos' watercourse facilities is Bjarne Berge.

Other roles with HSE responsibility

Other roles that hold HSE responsibility, and which are described in more detail in the "*Overall HSE instructions*" are:

- Supervisory personnel
- Professionally responsible for work related to electrical installations.
- Operations manager (high-voltage system) and operations manager (low-voltage system)
- Emergency Response Coordinator
- IT manager
- ICT Security Officer

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2.3 HSE responsibility in Projects Abroad

HSE work in international projects is just as important as it is in Norway, and is subject to the same guidelines as are given in Tinfos [HSE Policy](#). This is a document that all employees abroad must be aware of.

Below is a typical organizational chart of the ESG and HSE organization for a development project in Indonesia, including ESG/HSE support functions. HSE responsibility is built around a somewhat different structure than in Norwegian projects, and there are several players involved. As several of these roles differ from the way we organise HSE in the Norwegian projects, a summary of the main responsibilities is given below, based on Figure 2.

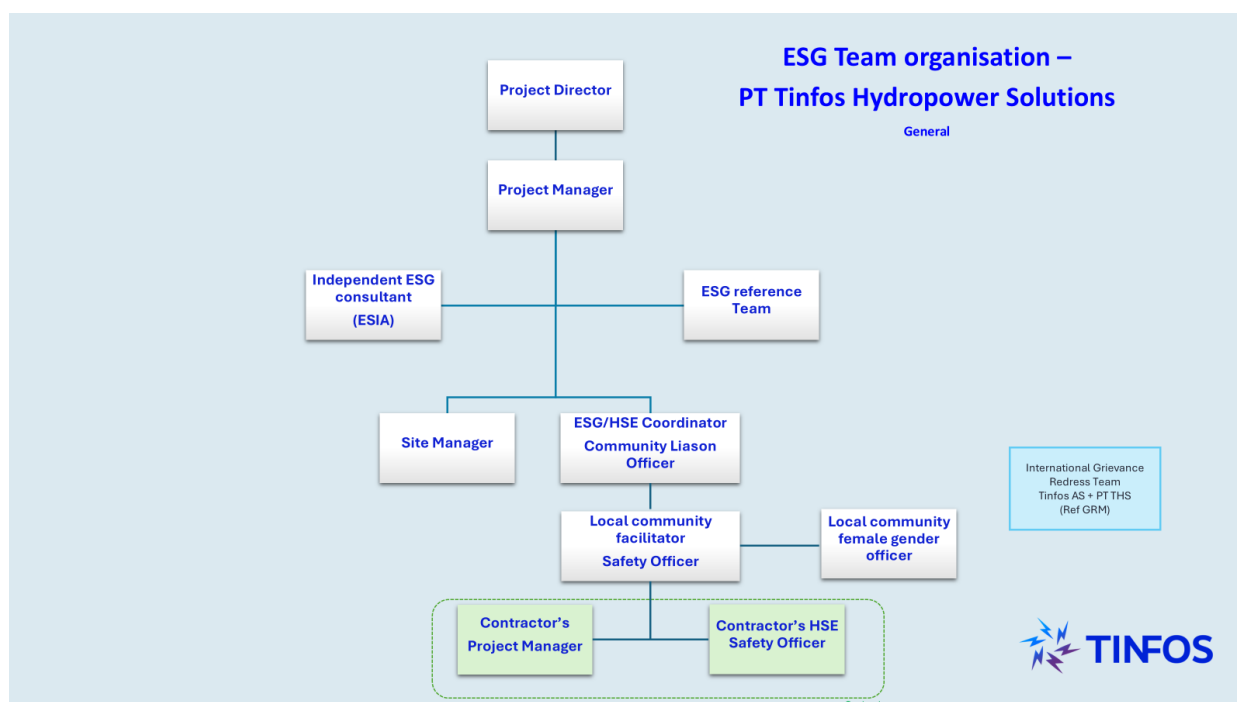


Figure 2 Organizational chart for Indonesia.

2.3.1 Role descriptions HSE responsibilities Projects abroad

Project Director International has overall responsibility for ensuring that HSE is taken care of and implemented in foreign projects. Project Director Global is an important link between practice in Norway and internationally. The role involves ensuring that quality tools and procedures are in place and that all employees in Indonesia have received adequate training in the company's quality system and digital tools for deviation reporting.

The Project Manager has overall responsibility for HSE in their respective projects and must demonstrate a strong commitment to HSE, creating a culture where safety is prioritised primarily. In addition, the project manager must ensure that [Tinfos HSE requirements](#) are implemented in all development contracts with contractors. Project Manager reports to the Project Director.

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Independent ESG consultants are hired external consultants who conduct environmental and social screening, risk identification and impact assessment (ESIA - Environmental and Social Impact Assessment) in the project. This is. These are processes that are closely followed by both the ESG reference team in Norway and the ESG/HSE coordinator in Indonesia.

The ESG Reference Team consists of resources associated with the Norwegian part of the Tinfos organization and contributes with professional support to help the project meet ESG/HSE guidelines set out in our framework, international standards, and requirements from our partners. The ESG Team contributes with assistance in the development of procedures, risk assessments, checklists, management systems and action plans for ESG/HSE for projects.

The ESG/HSE coordinator is responsible for the operational implementation of the HSE requirements on the construction site and for ensuring that the project complies with Tinfos ESG standards. The ESH/HSE Coordinator collaborates with the ESG Reference team and reports to the Project Manager.

The Community Liaison Officer is responsible for the communication flow with the local population and stakeholders in the project in accordance with the established communication plan (SEP). Reports to ESG/HSE coordinator.

The Site Manager (equivalent to the construction manager) is responsible for enforcing safety regulations and procedures, following up on identified hazards and contributing to risk mitigation measures throughout the project period. The site manager collaborates closely with the contractor's project manager and Tinfos ESG/HSE coordinator. The Site Manager reports to Tinfos Project Manager.

The Safety Officer on a construction site is responsible for ensuring that work is conducted in such a way that there is a safe working environment. The role has the same authority as the safety representative but is to a greater extent practically present in the ongoing risk assessments that are made and collaborates closely with the contractor's safety officer in addition to Tinfos Site Manager. Safety officer reports to the HSE Coordinator.

The local community female gender officer is responsible for the dialogue directly with vulnerable groups, including households where women live alone, in accordance with the established plan for communication (SEP). The female gender officer reports to and is followed up by the HSE coordinator.



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3 SYSTEMATIC HSE WORK

3.1 Updating in relation to laws and regulations

The company has an overview of and access to laws and regulations in health, safety and the environment legislation that apply to the business in the company's quality system Tinfos Netpower QMS. All employees in Tinfos AS have access to Netpower and received training in how our quality system is put together. Employees of PT Tinfos Hydropower Solutions in Indonesia also have access to national HSE regulations locally.

3.2 Election of safety delegate

On 4 October 2024, the employees of Tinfos elected safety representatives for three defined risk areas. There are no elected safety delegate for Team Indonesia. Hopefully this is in order during 2025.

Safety representative Operation and Maintenance:	Knut Olav Berget
Safety delegate Projects Norway:	Alexandru Titi Georgescu
Safety representative administration/International	Torgeir Aas

The union representatives NITO, Electricity and IT and Tekna elected Alexandru as the chief safety delegate, for Tinfos' now three safety delegate departments. He took over the seat in AMU from 4 October for outgoing safety delegate Borgar Johnsen.

3.3 Working Environment Committee AMU

For 2024, AMU consisted of the following members:

Borgar Johnsen	<i>Operations Dept., Safety Delegate</i>	Operations Operator	(to 4 October)
Alexandru Titi Georgescu	<i>Project Department</i>	Construction Manager	(From 4 October)
Ingebjørg Svendsen Beitnes	<i>Finance and administration</i>	Controller	
Marita Nordbø Eriksen	<i>Finance and administration</i>	Chief Financial Officer	
Asgeir Drugli	<i>The management team</i>	Chief Sustainability Officer	
Kari-Janne Dugstad Rystad	<i>BHT</i>	Avonova representative	

Substitute member of AMU

Eirik Noer Smedstad, *Project Department*, Development Manager
Royer Hartviksen, *Project Department*, Head of Project Development

AMU 2024 – case processing

The AMU had its inaugural meeting on 27.08.2024. At the constituent meeting, the following meeting schedule was set up:

Meeting	Date	Time
AMU	Tuesday 19.11.2024	09:00 – 11:30
AMU	Tuesday 11.02.2025	09:00 – 11:30
AMU	Tuesday 06.05.2025	09:00 – 11:30
AMU	Tuesday 26.08.2025	09:00 – 11:30
AMU	Tuesday 18.11.2025	09:00 – 11:30

Table 1 Meeting schedule AMU

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Fitness room for employees

A training room has been established for all employees in Borgen, Tinfos II. Keys can be picked up from Bente. Guidelines for use, maintenance and cleaning can be found in the minutes of the meeting from 2024.

Training of AMU representatives

All representatives of AMU must have a mandatory 40-hour HSE course. All members of AMU have finished, or have started, this course during 2024.

Cooperation with the occupational health service

Tinfos has an agreement on occupational health services with Avonova, which means that Avonova assists according to need and desire and within an agreed annual financial framework. See section 3.4 for more information about the occupational health service.

Input to the HSE action plan

AMU has provided numerous inputs to an HSE action plan, which deals with, among other things, courses, safety rounds, health checks and information about sick leave in collaboration with Avonova. The input includes proposals for extended health checks for employees. Follow-up and assessment of this have been included in the action plan for 2025.

Safety inspections

The AMU has reviewed routines for safety inspections that cover all three risk areas, such as operations, projects, and administration. Various focus areas are also discussed during the safety rounds.

3.4 Occupational health service

Tinfos AS has an agreement with Avonova on occupational health services and is part of the overall annual action plan for health, safety, and the environment in the company. An action plan is established annually for the occupational health service's activities in collaboration with AMU. In addition to advice and guidance provided in connection with inquiries from employees, managers and safety representatives, the occupational health service has assisted Tinfos with the following in 2024:

- Ergonomic inspection and advice/guidance for the operations department
- Occupational health advice and health checks in connection with vaccines for travel to Indonesia
- Assessment of the need for, and implementation of, vaccine for personnel from Indonesia, visiting Norway in September 2024
- Cooperation meetings, cooperation plans
- Preparation of annual report (in Norwegian)

3.5 Safety inspection

In 2024, 2 safety rounds were conducted, one of which was in collaboration with the occupational health service. Both safety inspections were conducted in the operations department, where the topics were outdoor areas and ergonomics, respectively.

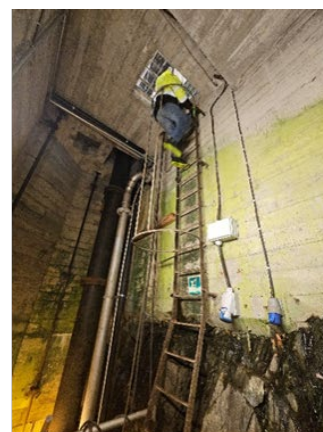
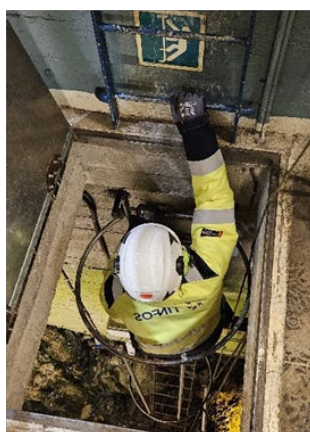
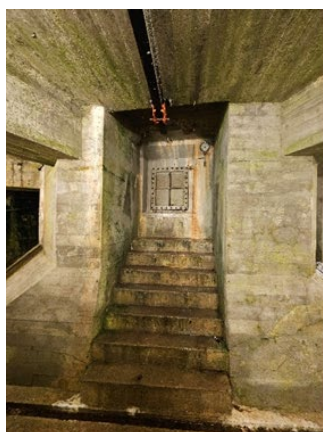
Conducted a safety inspection on 24 October 2024 for outdoor areas at Tinfos I and II, with a focus on the risk to 3 persons and employees who travel in the area, ponds and by the canal. A total of 13 non-

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conformities and 5 suggestions for improvement were registered. The safety inspection showed that there is a general need for maintenance, and reference was made to fouling and loose concrete parts. Inadequate signage and some inadequate barrier for access for 3'person were observed.

Conducted a safety round on 6 December 2024 with a focus on ergonomics for operating personnel. This was conducted in collaboration with the occupational health service, which submitted a report with improvement measures. In the report from Avonova, proposals were made to investigate the possibility of lighter beams in the "drums", to reduce heavy lifting. A proposal was also made to consider extending the opening into the "drum". Areas for turbine maintenance and the access area were designated as high-risk zones, in the event of an accident. A proposal was also made to assess the routines for manual transfers via stairs and ladders. Below are pictures from the safety round.



Picture 1 Pictures from the inspection, ergonomics of operation. Photo: Marianne Kanstad

3.6 Whistleblowing committee

At Tinfos, we have established a separate whistleblowing committee that handles whistleblowing cases in accordance with our policy for Whistleblowing Routine for Tinfos Group. The whistleblowing committee currently consists of:

- Marita Nordbø Eriksen
- Asgeir Drugli

3.7 Dialogue meetings

Dialogue meetings in Tinfos are conducted in accordance with the local agreement entered on 04.12.2012 on the cooperation structure and discussions on the company's ordinary operations; §9 of the Basic Agreement between LO and NHO, §8 of the Basic Agreement between NHO and NITO and §7 of the Basic Agreement between TEKNA and NHO

In 2024, 1 dialogue meeting was held on 15 April.
The union representatives for Tinfos are:

Electricity and IT -	Olav Ingolfssrud	Tekna -	Marianne Kanstad	NITO -	Tomas Flåterud
Electricity and IT -	Borgar Johnsen	Tekna -	Nicoleta Moldovan	NITO -	Truls Skeie

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3.8 General meetings

In 2024, 3 general meetings were held for all employees in Norway during the year: 13 June, 6 September, and 18 December.

3.9 Staff meetings

In all departmental/staff meetings, HSE must be included as a fixed item on the agenda.

3.10 Training / skills development

- General manager Øyvind Frydenberg has completed statutory management training in HSE based on AML § 3-5 in 2015.
- Sustainability Director Asgeir Drugli has completed "Management training in HSE based on AML § 3-5" and has also, together with the company's safety representative, conducted a statutory course for "Safety delegates and working environment committees based on AML §6-5 and §7-4" in 2012. An e-learning course in HSE for managers was conducted by Asgeir Drugli in August 2022.
- Operations Manager / Electrical Installation Manager Bjarne Berge holds qualifications cf. Regulations relating to electrical enterprises and qualification requirements for work related to electrical installations and electrical equipment.
- HSE manager Marianne Kanstad has completed courses in the Construction Client Regulations, the Working Environment Act (40 hours) and certification in the Hydropower Sustainability Standard in the period 2023 and 2024.
- The project manager for Stårheim Power Plant conducted a course in the Construction Client Regulations in May 2023.
- New safety delegates elected on 4.10.2024 started a statutory course for safety delegates and working environment committees (AML §6-5) by the end of 2024. The chief safety delegate has expanded HSE training from before.
- The annual course in the Regulations on Safety in Work in and Operation of Electrical Installations (FSE) was held on 9 January 2024. The purpose of the course is to ensure that all employees involved in work on, near or operation of electrical installations are FSE-certified. Project, construction and department managers and employees in the quality, HSE and sustainability departments are offered the opportunity to participate in the annual FSE courses.
- Mandatory first aid course incl. recertification of defibrillators for FSE-certified employees (offered to all employees) was conducted on 4.4.2024.
- Fire drill in Tinfos 1 for operating personnel was conducted on 29.01.2024.
- HSE day with the project department was held on 14.2. 2024.
- Knowledge boost in risk management, under the auspices of Renewable Norway, for the project department, safety delegates and management on 3.10.2024. Based on a joint evaluation within risk management in Tinfos.
- Exchange of experience and skills development of personnel from Indonesia, with a focus on HSE in practice, construction management and project management.

Other overviews of courses and certifications can be found in the individual departments' competence matrices.

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3.11 Deviation reporting

The Board of Directors of Tinfos AS has objectives for deviation reporting and deviation management as part of the company's performance indicator goals (KPIs). The company's management team receives a deviation report from the HSE manager every month, where the status is passed on to the board of Tinfos AS as part of the monthly reporting from the management team. In connection with the management meetings, HSE deviations with personal injuries are always discussed, depending on whether they have led to absence from work or not.

3.11.1 Notification process in the event of serious incidents

Serious incidents are reported immediately to the management team and, if applicable, to the board of directors of the company's subsidiaries. The CEO reports serious accidents directly to the board of directors of Tinfos AS. Adverse incidents involving personal injury are reported in accordance with the company's "*Notification process in the event of an accident involving personal injury in Tinfos AS*"

Any near misses and serious undesirable incidents are reported monthly to the management team and to the board of directors of Tinfos AS.

All accidents that result in absence from work undergo an incident analysis (Lessons Learned) where the course of events is described, and the accident site is registered and available to all employees. A root cause analysis and process are also conducted that identifies solutions and measures.

3.12 Emergency preparedness in Tinfos

Tinfos AS has a contingency plan that describes emergency management, activities, planning, and implementation in connection with special situations such as:

- Accident with personal injury
- Local dam break Tinfos
- Landslide/Slip in Intake Reservoir
- Operation of Tinfos power plant at water flow greater than the plant's flow capacity
- Water flow beyond normal flooding
- Fire in Tinfos Power Plant
- Fire in commercial buildings / rental properties
- Pollution to watercourses
- Measures when floodgates cannot be operated from control systems.
- Extraordinary flood warning $Q > 500$ m³/s and malfunction of floodgates
- Outbreak of pandemic or sick leave

The contingency plan, cf. The Power Emergency Preparedness Regulations were revised 24.03.2022 – Rev. 9. A new plan, rev 10, is being prepared.

- The emergency manager in Tinfos AS is Bjarne Berge (Power Plant Manager).

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Fire instructions

Fire instructions have been prepared and are available in power stations, administration buildings and other buildings on the company's properties.

- The fire protection manager for Tinfos' buildings is Bjørn Helgesen (Station Manager power plant).
- The deputy fire protection manager is Olav Ingolfsrud (Operations and Maintenance Operator).

3.13 Internal audits

Internal audits serve as a crucial tool for identifying, correcting, and preventing breaches of requirements stipulated in or pursuant to health, safety and environment legislation and ensuring monitoring and review of internal control in construction projects, cf. the Internal Control Regulations.

Internal audits of development projects are carried out in accordance with Tinfos' procedure for internal audits and are carried out in collaboration with the chief safety delegate in Tinfos AS and VTA for the project in question.

Internal audits conducted in 2024 are:
Frøytlandsfoss; full audit conducted on 4 September 2024.

3.14 Privacy/GDPR

Tinfos' privacy policy is made available on our website www.tinfos.no.

In addition to the privacy policy, the following constitute the privacy tool in Tinfos:

- Privacy instructions.
- Processing of privacy data in Tinfos.
- Data processing agreement registers.

The company plans annual reviews to ensure compliance with the regulation. No review of GDPR routines was conducted in 2024. Deviations from the privacy regulations are reported to the company's deviation system. It is recommended that training on GDPR is conducted in Tinfos AS for the entire organization to make employees aware of the processing of personal data.

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4 RISK AND VULNERABILITY ANALYSES (ROS)

4.1 Overall ROS for Tinfos, cf. the Internal Control Regulations.

The overall Risk and Vulnerability Analysis for Tinfos AS was conducted for Tinfos AS in 2009/2010 in accordance with requirements in the Internal Control Regulations. The AMU has assessed the need for mapping of risk in the various areas of Operations, Projects, and Administration. It is planned that this work will start in the spring of 2025, where safety delegates for the various departments will conduct a risk and vulnerability assessment based on a common template.

4.2 ROS Emergency preparedness - Emergency Preparedness Regulations – Tinfos AS

A new review and revision of ROS cf. The Emergency Preparedness Regulations were implemented in 2024. A warning exercise was conducted on 10 June 2024 and a review of the emergency plan on 19 December 2024

4.3 ROS in construction projects

Risk and vulnerability analyses are routinely conducted in projects where Tinfos is either the turnkey contractor or the main company. The role of responsibility affects which risk analyses are required to be conducted, ref. The Construction Client Regulations and IK watercourses. The overall risk and vulnerability analyses conducted in projects are shown in Table 2. The table also provides an overview of follow-up tools for the various risk assessments.

Type of risk and vulnerability analysis	Type of follow-up plan
ESG ROS	ESAP action plan
Safety, Health, and Working Environment (SHA)	SHA-plan (Norge), OHS-plan (Indonesia)
3`person risk assessment	Sign plan

Table 2 Project-related ROS and follow-up of these

Tinfos AS participated in 5 active construction projects in 2024. Table 3 shows the risk assessments with a focus on HSE that were conducted in the various projects.

Active project	Startup	Planned completion	Active months in 2024	ROS conducted during the period	Roles and responsibilities during the construction
Flateland	Oct. 2021	June 2024	6	3`person watercourse	Turnkey contractor
Frøytlandsfoss	Oct 2023	Sept. 2025	12	ESG ROS	Turnkey contractor
Smådalselva	March 2024	Sept. 2025	10	ESG ROS, 3`person watercourse (construction phase)	Turnkey contractor
Stårheim	Oct. 2024	June 2026	3	SHA, ESG ROS,	Builder
Nagajaya	Dec 2024	Feb. 2027	1	ESIA, OHS plan	Builder

Table 3 Overview of projects and performed risk and vulnerability analyses.

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4.3.1 ROS ESG

All projects conduct a risk and vulnerability analysis related to environmental, social and governance (ESG). The analysis is based on Tinfos' Policy for Sustainability and Responsible Business Conduct. The categories Social/Social encompass several topics relating to HSE, and ESG ROS is thus a crucial tool for ensuring compliance with the HSE framework and uncovering any risks that may arise in connection with the project implementation.

ESG ROS forms the basis for an action plan, ESAP (*Environment & Social Action Plan*), which serves as an ongoing quality control of hazard areas related to the environment and society and is safeguarded throughout the project phase. The action plan/ESAP is therefore an important HSE tool in projects. In 2024, ESG ROS was conducted for Frøylandsfoss, Smådalselva and Stårheim Kraft AS. See Table 3.

For Indonesian projects, an ESIA (*Environmental and Social Impact Assessment*) is conducted, which replaces the Norwegian "ESG-ROS". We use third-party consultants for this, and ESIA forms the basis for the establishment of an ES-Management Plan (ESMP), which in turn is the basis for the action plan (ESAP).

4.3.2 SHA plan

In cases where Tinfos is the client, an overall Risk and Vulnerability Analysis is conducted, which results in an SHA plan, adapted to the project introduced risk areas, cf. the Builder Regulations.

For 2024, an SHA plan was prepared for Stårheim power plant and a corresponding OHS plan for Nagajaya, Indonesia. Both projects started in November/December 2024. For other ongoing projects, the SHA plan was updated as needed in connection with client meetings.

4.3.3 ROS 3rd person watercourse operation and project

Operation

Tinfos conducts Risk and Vulnerability Analyses for 3rd person for all our watercourses referring to Dam Safety Regulations.

The watercourse facilities at Notodden:

- Tinfos I & II ; ROS 3 person performed Sept. 2023 as well as risk assessment of extra ordinary conditions December 2024 cf. KBF.

Watercourse facilities in the Kobbholm watercourse: An audit of the risk conducted, and vulnerability analyses are planned in the course of 2025. The most recent audits were in 2020 and concern the facilities:

- | | |
|------------|----------------|
| • Kobbholm | • Trillingvann |
| • Valvatn | • Viksjøen |

Project

ROS 3'person watercourse for the project was conducted as shown in Table 3 and included a sign plan for the operational phase for Flateland and a sign plan for hiking trails and traffic in connection with the construction phase of Smådalselva. For Frøylandsfoss, Å energy did this, in the role of Builder.

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A 3-person ROS is planned for Stårheim and Nagajaya in early 2025, with a focus on signage during the construction phase near hiking trails, traffic arteries and along roads.



Picture 2 Flateland, Eirik, and installation of signs. Kjetevatnet, Ezra, on observation ROS 3'person and Agus by Smådalselva, with registration of hiking trails at the construction area. Photo: Marianne Kanstad

5 DEVIATION REPORTING 2024

All the company's employees receive training in deviation reporting and are encouraged to actively contribute to the identification of risks and improvement potentials in all parts of the company's activities.

Deviation reporting and processing of the deviations are described in document 254 [Handling of deviations](#), in Netpower. The handling of non-conformities shall provide a basis for the implementation of measures that in total improve the performance, efficiency, and ability to achieve the desired results, including HSE objectives.

5.1 Key performance indicators (KPI)

The Board of Directors of Tinfos AS made the following KPI decisions regarding deviation reporting:

- Identification of a minimum of 200 nonconformities in 2024
- 80% of the deviations should have a processing time of less than a month.

The board has linked the KPI to the company's bonus scheme for all employees.

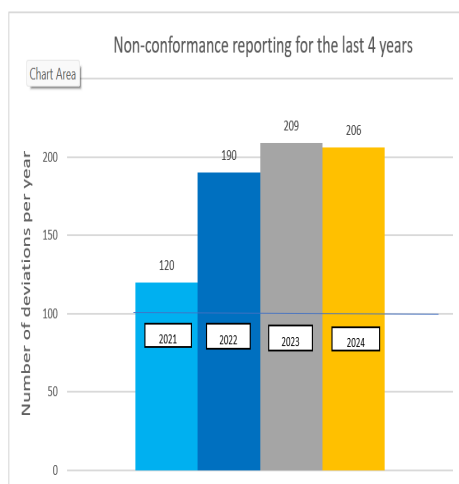
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5.2 Result deviation reporting

Tinfos AS achieved the KPI target for deviation reporting in 2024.

- A total of 206 nonconformities were submitted in 2024.
- 87.4 % of the non-conformities were processed within one month.



There has been an increase in non-conformity reporting in recent years, as shown in Figure 4. It is the same CPI for 2023 and 2024.

Increased non-conformance reporting is in line with the desired development and a direct result of the efforts made regarding reporting practices in the projects, operations, and administration.

In relation to treatment time, 87.5% of the non-conformities were processed within one month. This shows that the non-conformance system facilitates effective and good follow-up of measures, and that those who are assigned the non-conformity treatment have good routines for closing the non-conformities within the 30-day deadline.

Figure 3 Non-conformance reporting last 4 years

5.3 Deviation distribution

In relation to non-conformities related to business area, Tinfos Entreprenør AS has the largest proportion of non-conformities, totalling 130, corresponding to 63% of all business areas. The figure below shows the distribution of nonconformities in different business areas.

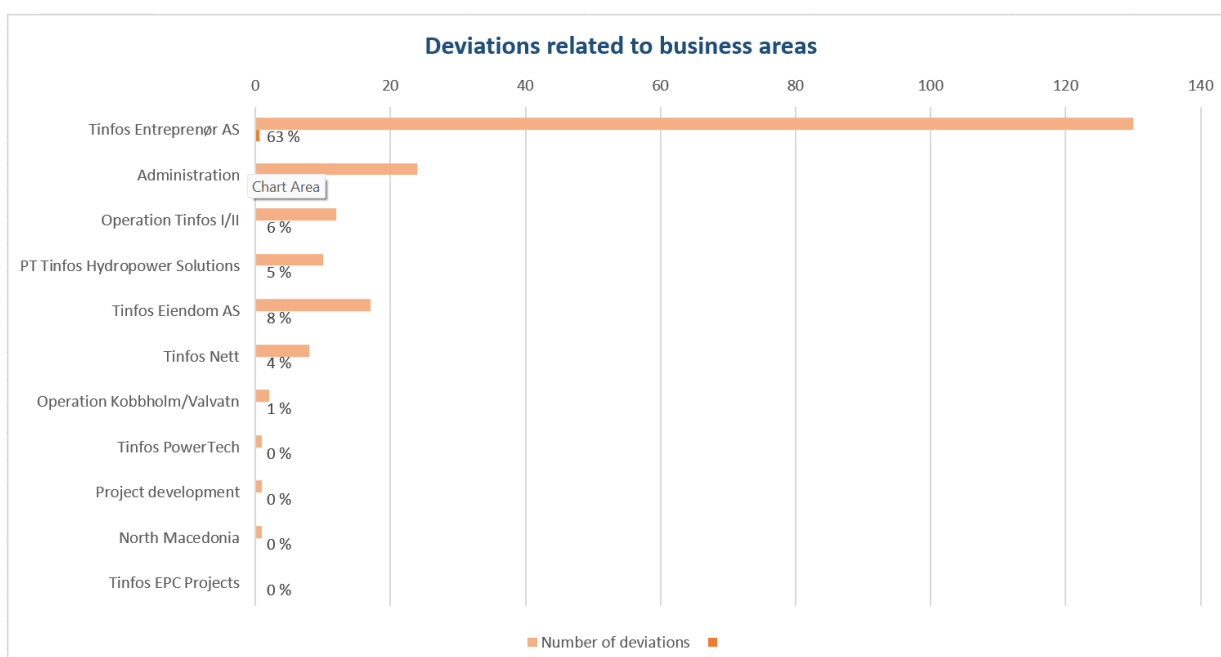


Figure 4 Overview of distribution of nonconformities related to business area.

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Administration has a share of deviations of 12% and is lower than in 2023 (17%). Operation Tinfos has a deviation rate of 6%. It is worth noting that the number of deviations on operations is incredibly low compared to how it was before we switched to Netpower (operations previously used Sticos). PT Tinfos Hydropower Solutions (Indonesia) has a share of 5%, about the same level as the previous year.

It is expected that there will be more non-conformance reports from Indonesia's project in 2025, as the activity with construction activities in Nagajaya did not start until December 2024. It is a goal to increase non-conformance reporting for Administration and Operations in 2025. Non-conformities from Tinfos property are largely related to inspections of outdoor areas and related to maintenance.

5.4 Severity

Of the reported non-conformities in 2024, 76% were registered with a low degree of severity. In comparison, the corresponding figure for 2023 was 44%. This is visualized in Figure 6.

Non-conformities registered with medium severity in 2024 were 17%. The corresponding figure for 2023 was 37%.

The proportion of non-conformities defined with a high degree of severity for 2024 was 7 %. For 2023, the corresponding share was 19%.

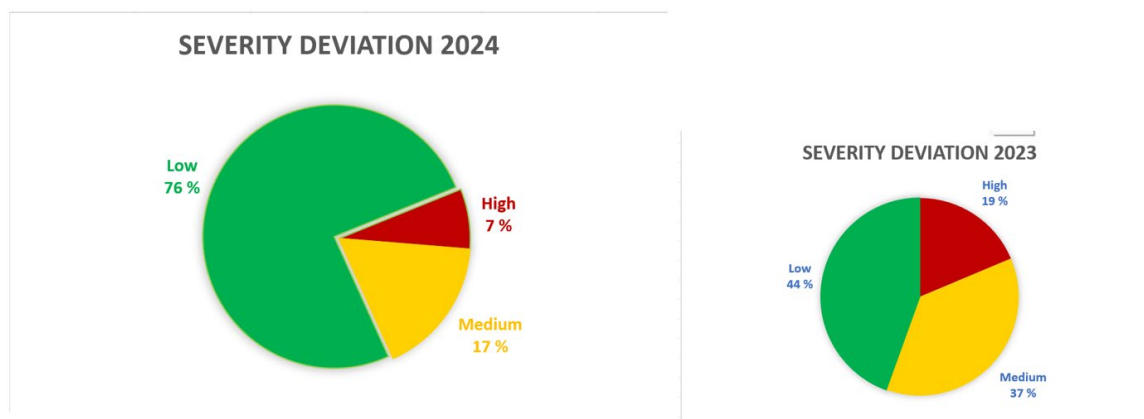


Figure 5 Nonconformities, distribution of severity 2024 and 2023.

In 2024, there are far more non-conformities registered with low severity than in 2023, and there are fewer non-conformities registered with medium or high severity. Table 4, below, shows figures for the last 3 years.

Severity:	Number 2024	Number 2023	Number 2022
High	14	39	26
Medium	32	77	68
Lichen	143	93	96
Uncategorized	17	0	0
Total deviation	206	209	190

Table 4 Distribution of nonconformities by severity

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As most nonconformities are delivered from Tinfos Entrepreneur, the statistics indicate that the threshold for submitting nonconformities at our contractors has been lowered, because low-risk incidents are now registered to a greater extent than before. This can be explained by a greater awareness in relation to deviation reporting and is a desired development.

The clear reduction in high- and medium-severity non-conformities may indicate that there is a greater awareness of risk-reducing measures and that particularly good work is being done to reduce risk on a general basis.

Another indication of the change shown above is that there has been a greater level of awareness in the organisation of how non-conformities are assessed according to their degree of severity. Based on a deep dive into the data material in Netpower, the impression is given that there are individual differences between what is perceived as serious, and what is perceived as medium or low severity. This shows that defining severity is to some extent characterized by subjective experience. It is a goal that in the long term, this type of assessment will have more objective and consistent definitions in the organization.

Uniform assessment of severity is a potential for improvement for more precise deviation management.

5.5 Causes of non-conformities

Statistics on the causes of non-conformities are a valuable tool for implementing measures where the need is greatest and contributing to targeted risk-reducing measures. If you look at the 5 most used categories, some categories are repetitive, even if there are changes in the ranking of the reasons. See figure 7 for an overview of the 5 most used categories, for 2024 and 2023.

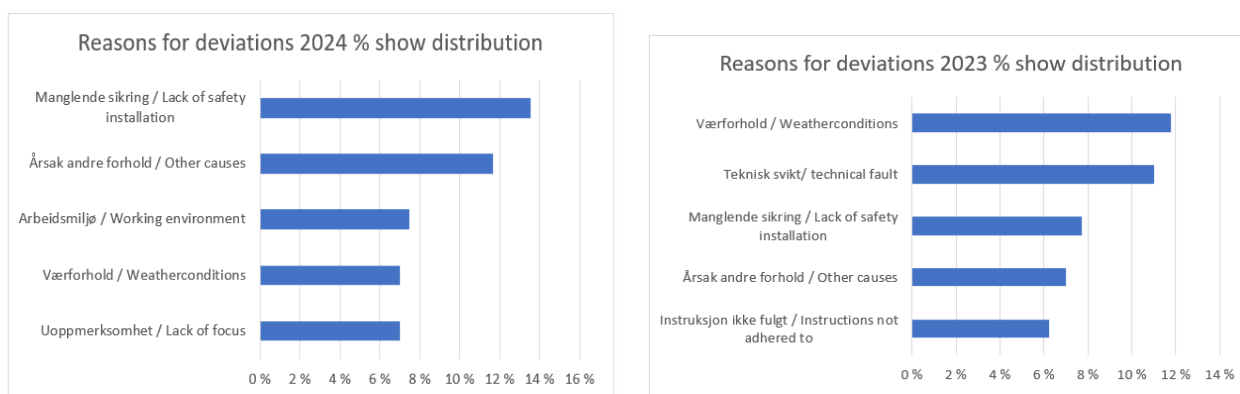


Figure 6 Reasons for non-conformities 2024 and 2023.

An overview of categories is given at Figure 8, but only for causes of non-conformities with more than 2 registrations are included. Causes with 2 or fewer registrations are summarised in Table 5.

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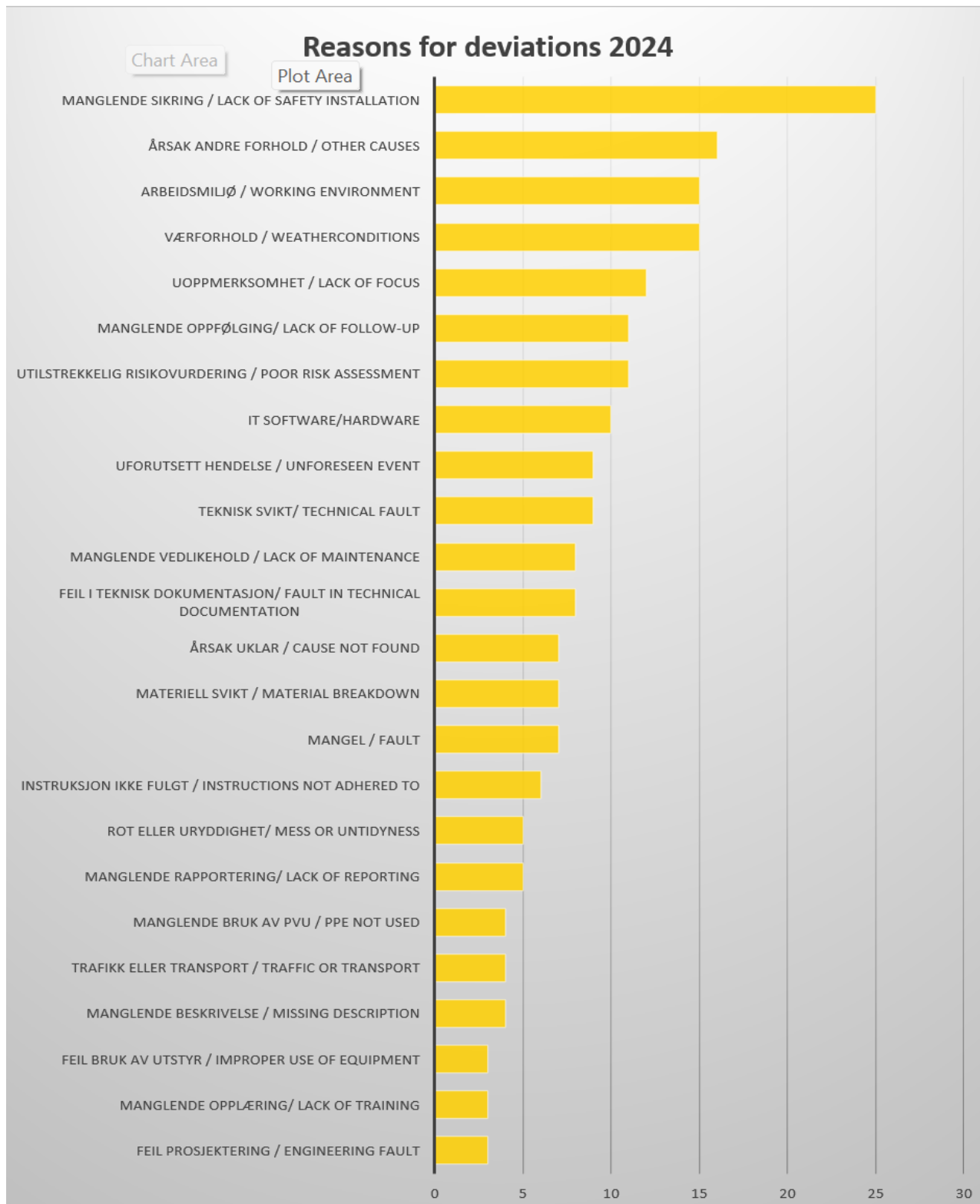


Figure 7 Summary of registered reasons for non-conformities 2024.

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In 2024, it was the category *"lack of security"* that had the most deviations, in percentage distribution. Only one of the nonconformities in this category was defined as high, and one with medium severity. Other non-conformities related to *"lack of security"* were defined as having a low degree of severity.

The category *"Cause other conditions"* was stated as the second most used category in 2024. Of the non-conformities registered in this category, only one was a non-conformity with a high degree of severity, the rest with a low degree of severity.

The category *"Working environment"* was the third most used term for the cause of non-conformities in 2024. One of the nonconformities was defined with high severity, three with medium grading and the rest low. There were no personal injuries involved in any of these non-conformities. In 2023, it was the cause *"Weather conditions"* and *"technical failure"* and *"lack of security"* that were in the top three.

Årsak / Cause of event	Verdi
Forretningsadferd/ Business conduct	0
IT-avvik/ IT-deviation/ Governance	<u>0</u>
Hærverk eller kriminalitet/Vandalism or crime	0
Budsjettoverskridelse/ Budget overrun	<u>1</u>
Feili overliggende nett/ EL. regional net fault	1
Feil montasje / Installation fault	2
Naturkvalitet / Quality of nature	2
Tidspress/ time pressure	<u>2</u>

Table 5 Reason categories with 2 or fewer registrations

Causes of non-conformities is a category that consists of a total of 33 possible alternative causes, in the current setup in Netpower. The category *"Cause other conditions"* is number two, as the second most used reason. This may indicate that there is uncertainty associated with defining the cause of nonconformities, despite a lot of alternatives.

It is also worth commenting that the reason *"Weather conditions"* is not at the top of the list in 2024 but was ranked highest in 2023. This is despite a lot of extreme weather in 2024, and several flooding situations in areas where we had construction activity. This may be a result of an increased focus on water management in 2024, and thus better risk assessment and preparations to withstand extreme precipitation. Another alternative may be that there is uncertainty in how deviations are to be assessed for cause, and this results in greater variation than the actual changes in the risk picture.

A potential for improvement for the categories Reasons for deviations is to simplify the overview, and to have an internal review.

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5.6 ESG- and HMS- deviations

Tinfos registers ESG deviations in accordance with the categories **Environment, Social and Governance**. The sum of environmental and social (E & S) non-conformities is defined as HSE non-conformities. Of the total non-conformities submitted, 206, 105 are defined as HSE-related. These nonconformities are related to RUH and project activities. See Table 6 for figures.

Deviations per ESG category	Sum	Quality deviation	RUH
Environment	52	8	44
Social	53	10	43
Governance	7	4	3
Sum	112	22	90

Table 6 ESG deviation 2024

No personal injuries or serious environmental impact (emissions, pollution) were reported in 2024.

5.7 Summary of deviation reporting

HSE topics in the future will be to follow up the security of personnel and equipment at construction sites, based on the fact that this was the most used category for reasons for non-conformities. Protruding rebar is a key word here, as numerous of the deviations under "*lack of security*" dealt with this. Furthermore, risk assessment must be seen in combination with water management and extreme precipitation, or other weather conditions that increase risk. Based on statistics from 2023 and 2024, security and weather conditions are thus key topics for early risk assessment.

The quality system – Tinfos Netpower Quality – was put into use at the beginning of June 2023. It is to be expected that during 2024 we will see areas where we can improve both our use of the quality system, updating functions and adaptations that meet our needs even more. This shows that the organization has gained knowledge of the system itself and acquired experience to adjust according to our needs. This is a positive development. Measures to improve non-conformance reporting are:

- Training and awareness to increase deviation reporting for administration and operations.
- Facilitate a uniform assessment of the severity of reported non-conformities.
- Go through the categories for Reasons for deviations and discuss good adaptations together.



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6 OCCUPATIONAL HEALTH

Sick leave is absence from work due to illness, injury, or other health problems. Good occupational health is therefore a prerequisite for low sickness absence. The causes of sickness absence are complex, but according to STAMI, the National (*Norwegian*) Institute of Occupational Health, research has confirmed that conditions in the workplace can play a role. Knowledge of the specific factors in the workplace is a prerequisite for implementing targeted prevention measures. Assessing sickness absence in a company therefore provides a picture of the employees' occupational health.

6.1 Total sickness absence

Tinfos has had low sick leave for a long time, which also applies to 2024. The total sickness leave for 2024 was 2.41%. This figure includes both short-term absence (less than 16 days) and long-term absence (over 16 days). This is a slight increase from 2023 and is related to registered long-term absence (Ref table 7 below for details).

Tinfos has a strong focus on the physical and psychosocial working environment, and low sickness absence may indicate that there is currently good occupational health for employees affiliated with Tinfos.

Sick leave 2024			
	shorttime (0-16 days)	Longtime (>16 days)	Total
2024	1,37 %	1,04 %	2,41 %
2023	1,32 %	0 %	1,32 %
2022	2,1 %	0,5 %	2,6 %
2021	1,5 %	1,2 %	2,7 %

Table 7 Sickness absence 2021-2024

6.2 Physical working environment

In 2024, a review was carried out of risk-exposed work locations associated with the operations department with a view to ergonomic adaptation. Employees were visited by a consultant from the occupational health service, Avonova, who assessed the various zones in collaboration with the operations department's representatives. The focus was heavy lifting, slippery walkways, access to different areas and transport of materials in the power station. The findings were submitted in a report that is discussed under safety rounds for Operations.

For the administration, the focus was maintained on the points that were highlighted from the occupational health service's review in 2023. Here, topics such as lighting conditions, adaptation of the work situation, screens and adaptations of keyboards have been maintained and replaced as needed. Safety rounds are planned in all departments at Tinfos in the spring of 2025, where, among other things, the topic of the physical working environment will be risk assessed. Results from this will be processed in the AMU.

6.3 Psychosocial working environment

A low level of sickness absence is an indicator that systematic work for HSE in the workplace is important and helps to create a workplace where employees experience a good psychosocial working environment and thrive.

The previous working environment survey was conducted in 2021. In 2024, it became a topic at the AMU meeting, and a process has been initiated for the implementation of department-specific safety

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rounds in the spring of 2025, where, among other things, the topic of the psychosocial working environment will be risk assessed. Results from this will be processed in the AMU.

7 CHEMICALS

The Substance Index has been established as an online database at the supplier ECO-Online. During 2023, a clean-up of the chemical inventory was conducted. In 2024, instructions were established for the maintenance of the database, and all employees will receive training in how to use the company's substance database.

All new substances that came into Tinfos Operation were registered in the substance register.

Work was initiated to assess the need for chemical cabinets with extractors for certain substances. This work will continue in 2025. Furthermore, a revision of internal instructions and procedures related to the treatment, storage and use of hazardous substances is planned. This review will involve everyone in the operations department.

8 WASTE DISPOSAL

From 2024 onwards, the topic of waste management will only be presented in the company's Sustainability Report. There, the amount of waste generated in Tinfos AS's operations, in operation and projects, will be presented with an overview of fractions, degree of recycling and different varieties of hazardous waste. The sustainability report will be posted on our website when it is ready, estimated at May 2025.

All waste in Tinfos AS's activities is delivered to approved reception centres, both in Norway and abroad. It is a goal that 70% of the waste generated in Tinfos activities will be recycled.

9 REVIEW HSE DOCUMENTATION

Through government audits and internal audits over the past few years, the company has been able to document that HSE documentation for all parts of the business is satisfactory, and that this is consistently complied with by the organization. Observations and non-conformities have been recorded and managed in accordance with internal procedures.

Tinfos initiated implement a new digital quality system in the autumn of 2022, and work began on transferring routines, instructions, processes, and procedures to the new quality system. The quality system – Tinfos Netpower Quality – was put into use at the beginning of June 2023 and everyone in the company received a training introduction to the system. The system contributes to a better structure in terms of preparation, consultation, and approval processes for HSE documentation, and quality documentation in general.

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A review of this HSE report shows that there is a good deal of documents that need an update, and the most important ones are mentioned here:

- *Overall HSE Instructions*"; Update in role descriptions and translate to English
- Tinfos HSE requirements Project Indonesia; Updates in roles etc.
- Tinfos HSE – requirements Project Norway; Updates in PPU and target groups
- OHS plan for Nagajaya; Change in title.
- Internal audit procedure; adapt questions and references to EPC contracts.

10 SUPERVISION AND CONTROLS

10.1 Fire Inspection (Notodden Fire Department)

Fire inspections at Tinfos' properties and power plants are conducted regularly by the Notodden Fire Department.

10.2 Security and Emergency Preparedness (DSB)

The Directorate for Safety and Emergency Planning supervises in the areas of chemical and explosive safety, electrical safety, product safety, fire, and rescue. DSB also facilitates inspections conducted by the municipalities on behalf of DSB. DSB conducts inspections at Tinfos in accordance with its own plans.

10.3 Environmental Inspectorate (NVE)

The NVE's environmental supervision shall check that the construction, maintenance and operation of watercourse and energy facilities is conducted in accordance with requirements laid down in or pursuant to the watercourses and energy legislation. The NVE conducts inspections at Tinfos, cf. license and according to their own plans.

10.4 Compliance supervision in relation to discharge permits (County Governor)

The County Governor is the pollution control authority for a wide range of activities and measures and can grant permits for activities that may cause pollution. The County Governor's tasks under the Pollution Control Act include supervising that enterprises comply with the obligation to deliver hazardous waste and other general obligations in discharge permits and the pollution and waste regulations.

10.5 The Norwegian Labour Inspection Authority

The Labour Inspection Authority conducts inspections to check that enterprises meet the requirements of the working environment regulations to ensure that a workplace is not dangerous for employees. The Labour Inspection Authority conducts inspections at Tinfos in accordance with its own plans.

10.6 Supervision cf. Dam Safety Regulations

Watercourse facilities shall be monitored so that conditions that may lead to a reduction in the safety of the facility can be identified as early as possible. The watercourse legislation stipulates requirements for the implementation of the following internal audits:

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- Periodic inspections (consequence classes 1-4), at least one time per year
- Main supervision (consequence class 2-4): At least every five years
- Main supervision (consequence class 1): At least every seven years
- Special supervision (consequence class 1-4), During and after abnormal situations / major stresses on the facility.

The audits are conducted in accordance with the audit programme administered by the operations department at Tinfos.

10.7 Table overview of inspections and controls carried out.

Tinfos conducts inspections of its own equipment, cf. regulations and equipment specifications. The most important controls regarding HSE are listed in the table below.

SUPERVISION AND CONTROLS				
Description	Last performed by	Date Last Performed	Completed in 2024	Expected next time
FIRE INSPECTION				
Fire inspection Tinfos 1	Notodden Fire Department	09.01.2023	-	2025
Fire inspection Tinfos 2	Notodden Fire Department	09.01.2023	-	2025
Fire inspection Telemark art museum	Notodden Fire Department	17.04.2023	-	2025
AUTHORITY SUPERVISION (DSB, NVE, Labour Inspection Authority)				
Safety supervision at Tinfos Notodden	ETC	08.10.2020	-	ON
	The Labour Inspection Authority	ON	-	ON
	County Governor	ON	-	ON
MAIN SUPERVISION cf. DAM SAFETY REGULATIONS				
Main supervision Tinfos I, pond at 2 o'clock	Sweco	02/01/2022 (reassessment)	-	2026
Main supervision Tinfos II dam at 1 am	Sweco	18.12.2023 (reassessment)	-	2030
Main audit Tinfos II waterway at 1 a.m.	Norconsult	18.12.2023 (reassessment)	-	2030
Main inspection Trillingvann, pond at 1		10.2024	-	2031(Reassessment)
Main inspection Valvatn waterway in kl. 1	VTA/Tinfos supervisory	10.2024	-	2031 (Reassessment)

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SUPERVISION AND CONTROLS				
Description	Last performed by	Date Last Performed	Completed in 2024	Expected next time
PERIODIC INSPECTIONS, cf. DAM SAFETY REGULATIONS				
Periodic inspection Dam Tinfos I	VTA/Tinfos	31.08.2023	12.12.2024	2025
Periodic inspections Tinfos II	VTA/Tinfos	See main	16.12.2024	2025
Periodic inspection Valvatn	VTA/Tinfos	17.11.2023	See main	2025
Periodic inspection of Triplet water	VTA/Tinfos	17.11.2023	See main	2025
INTERNAL AUDITS PROJECT				
Flateland			-	
Smådalselva				April 2025
Frøytlandsfoss	Tinfos	4.9.2024		
Stårheim				June 2025
Nagajaya				Not clarified
EQUIPMENT CONTROLS				
Inspection of fall protection equipment	Eiva Safex	January 2023	January 2024	2025
Inspection of operating rods	Tinfos	February 23	April 2024	2025
Inspection of grounding devices	Tinfos	February 23	April 24	2025
Inspection of Dividers	Tinfos	March 23	April 24	2025
Inspection of Voltage Testers	Tinfos	March 23	April 24	2025
Inspection of Led Light	Tinfos	February 23	February 24	2025
Inspection of cranes and lifting equipment	KoneCranes	February 23	February 24	2025
Inspection of Truck	Toyota	09.11.2023	-	2025
Elevator inspection at O H Holtas street 25	Heiskontrollen AS	19.01.2024	-	2026
Elevator inspection at O H Holtas street 27	Heiskontrollen AS	19.01.2024	-	2026
Elevator inspection at O H Holtas street 32	Heiskontrollen AS	19.01.2024	-	2026
Control of defibrillator power station	Your First Aider AS	March 2024	March 2025	2025
Control of defibrillator at O H Holtas street 32	Your First Aider AS	March 2024	March 2025	2025
Control of all first aid stations	Documented in Job-tech	2023	2024	2025

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SUPERVISION AND CONTROLS				
Description	Last performed by	Date Last Performed	Completed in 2024	Expected next time
Control of fire protection equipment (hand extinguishers, fire alarm systems, etc.) internal instructions.	The fire specialist, Autronica fire and security and others.	March 2023 June 2023	March 2024 May 2024	2025 2025
Control life jackets and life buoys	Documented in Job-tech	2023	2024	2025

11 ACTION PLAN HSE

HSE Action Plan 2025					Revision: 01 11.03.2025
Actions	Objectives	Revised objectives	Responsible	Status	
First aid course for FSE certified personnel (offered to all employees)	Q1		Power Plant Manager		
Annual reporting 2024 HSE	Q2		Sustainability Director		
Training (40-hour course) all AMU rep. + Safety representative	Q2		Sustainability Director		
Establishment of new safety round instructions, all three risk areas	Q2		Sustainability Director		
Safety round 1st half of the year, all three risk areas	Q2		Safety Delegate		
Registration Tinfos "Cycling to work", call for participation	Q2		Sustainability Director		
Information meeting for all employees with CHS regarding sick leave and obligations	Q3		Sustainability Director		
Health check, general health or lifestyle?	Q3		Sustainability Director / Corporate Health Service (CHS)		
Course in the FSE regulations, operating operators and project staff	Q4		Power Plant Manager		
Safety round 2nd half of the year, all 3 risk areas	Q4		Safety Delegate		
ROS compares internal control regulations	Q4		Sustainability Director / Safety representative		

12 SUMMARY HSE ANNUAL REPORT 2024

A summary of the initial points for the objective of this HSE annual report:

- **Ensure compliance with laws and regulations:** The report documents that the company meets the requirements of relevant laws and regulations (e.g. internal controls, requirements for competence, AMU, safety representatives, supervision, and controls).
- **Goal attainment and improvement measures:** The established HSE requirements have been met, and several improvement points have been identified.
- **Results from non-conformance processing:** Results and analysis of non-conformance processing have been conducted, and it has been presented with comparison with previous years. The report summarises several improvement measures for non-conformance management in Tinfos as an organization.
- **Risk management:** Reference has been made to the risk assessments conducted and measures have been identified to reduce the risk of injuries, accidents or working environment-related incidents. For 2024, non-conformities related to lack of security and water management were highlighted as focus areas going forward.
- **Updating HSE documentation:** HSE documentation has been reviewed, and deviations have been submitted on the documents that need an update.
- **Action plan for the coming year:** An action plan has been issued with concrete measures for the coming year.