

# GROUP HEALTH & SAFETY POLICY



## STATEMENT OF INTENT

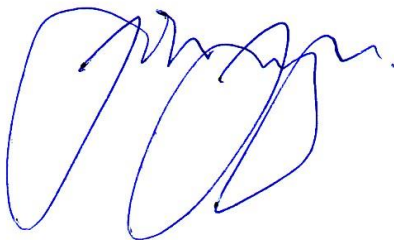
*Our statement of general policy is:*

- To provide adequate control of the health and safety risks arising from our work activities;
- To consult with our employees on matters affecting their health and safety;
- To provide and maintain safe plant and equipment;
- To ensure safe handling and use of hazardous substances;
- To provide information, instruction and supervision for employees;
- To ensure all employees are competent to do their tasks, and to give them adequate training;
- To prevent accidents and cases of work-related ill health;
- To maintain safe and healthy working conditions; and
- To review and revise this policy as necessary at regular intervals, striving for its continual improvement.

*We require that all employees:*

- Co-operate with supervisors and managers on health and safety matters;
- Do not interfere with anything provided to safeguard their health and safety;
- Take reasonable care of their own health and safety;
- Report all health and safety concerns to an appropriate person (as detailed in this policy statement),  
If an appropriate response is not received, the matter should be upwardly escalated to senior staff,  
and for the attention of the Managing Director, if necessary.
- Be familiar with and recognise the importance of safety within everything we do.
- Are actively encouraged to participate in and contribute to the continual improvement of the Group's Safety Plan.

**Signed**



John Traynor  
Managing Director

**19/02/2016**



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## AIMS AND STRATEGIC OBJECTIVES OF THE GROUP HSE POLICY

### GENERAL

- Ensure that sites are safe, secure, and well organized
- Prevent accidents, incidents and property damage
- Provide optimal working conditions with no risk to employees
- Minimise damage to the environment
- Emphasis on job planning, which must factor in all HSE considerations.
- Ensure an effective medical protocol in case of an accident
- Train and update all managers, engineers, and general employees on all safety aspects, and maintain safety awareness throughout all operations
- All staff must read, understand and comply with the Health & Safety Policy and its supplementary procedures and work instructions
- Ensure that the above objectives are appropriately communicated to all within the organisation

### OCCUPATIONAL HEALTH

We aim to protect employees from health hazards that may be associated with our work and working environment. We shall be active in health promotion, aiming to prevent health risks associated with the general working environment. Our policy on health is to ensure:

- A good working environment for the employee
- Clear policy in relation to health
- The avoidance of any illnesses which can be related to work performed

### SAFETY

- Achieve zero fatalities
- Achieve zero lost time incidents (LTI)
- Achieve zero non-adherences to rules and regulations
- Ensure that engineers perform their activities in a safe manner
- Mitigate and learn from near misses
- Ensure all engineers receive relevant training and are competent to complete the tasks at hand
- Ensure employees are aware of all possible hazards and existing control measures

### SECURITY

- Ensure adequate security of personnel, materials, and equipment in the workshops, warehouses, and on site
- Ensure adequate security of personnel at the company offices
- Ensure that procedures are in place to minimise risk of theft and violence
- Ensure that only authorized personnel are permitted on group premises

### ENVIRONMENT

- We aim to minimise the environmental impact of our activities
- Foster open communication on our environmental performance
- Systematically manage environmental performance
- Continuously improve environmental performance

## SAFETY ORGANISATION

The Safety Organisation of the group has been set up as follows, by title and responsibility. It is the responsibility of all managers and supervisors to ensure that the requirements of the Health and Safety Policy are understood and observed by all staff.

### MANAGING DIRECTOR

The Managing Director is responsible for the overall HSE arrangements and for ensuring that the company's operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations.

### SAFETY MANAGER

The Safety Manager is designated responsibility by the Director responsible for health and safety to control and update this Safety Manual and to ensure that all Departments operate in accordance with the procedures and instructions contained there. The primary role of the Safety Manager is to advise the Directors and Managers on all safety, health and welfare matters to ensure the Company complies with its statutory obligations. The Safety Manager is responsible for implementing and communicating the safety plan within and throughout the organisation and its subsidiaries. The safety manager is responsible for establishing the Organisation structure for Safety, the Technical and Operational Safety Designates.

### SAFETY REPRESENTATIVES - TECHNICAL

The technical safety team is responsible for taking ownership of both Standard Operating Procedures for their designated brands, and Risk Assessments in the areas in which they work. They are also responsible for implementing training programmes for their teams. They must ensure that all accidents and near misses are reported immediately and investigated.

### SAFETY REPRESENTATIVES - OPERATIONAL

Each subsidiary will have at least one Operations Safety Representative who is responsible for keeping safety document up to date and circulated amongst staff. They are responsible for safety induction for new members of staff and periodic safety training for all staff. They must ensure that all accidents and near misses are reported immediately and investigated.

### MANAGERS/HEADS OF DEPARTMENT

Each Manager/Department Head is responsible for his personal safety and that of all personnel under his or her authority, including others who may be affected by the company's activities.

### HSE OFFICER

The role of the HSE officer is to generate reports and risk assessments based on site and premises inspections, in conjunction with the Technical Safety Teams to generate JSAs, give tool box training to local engineering and service teams.

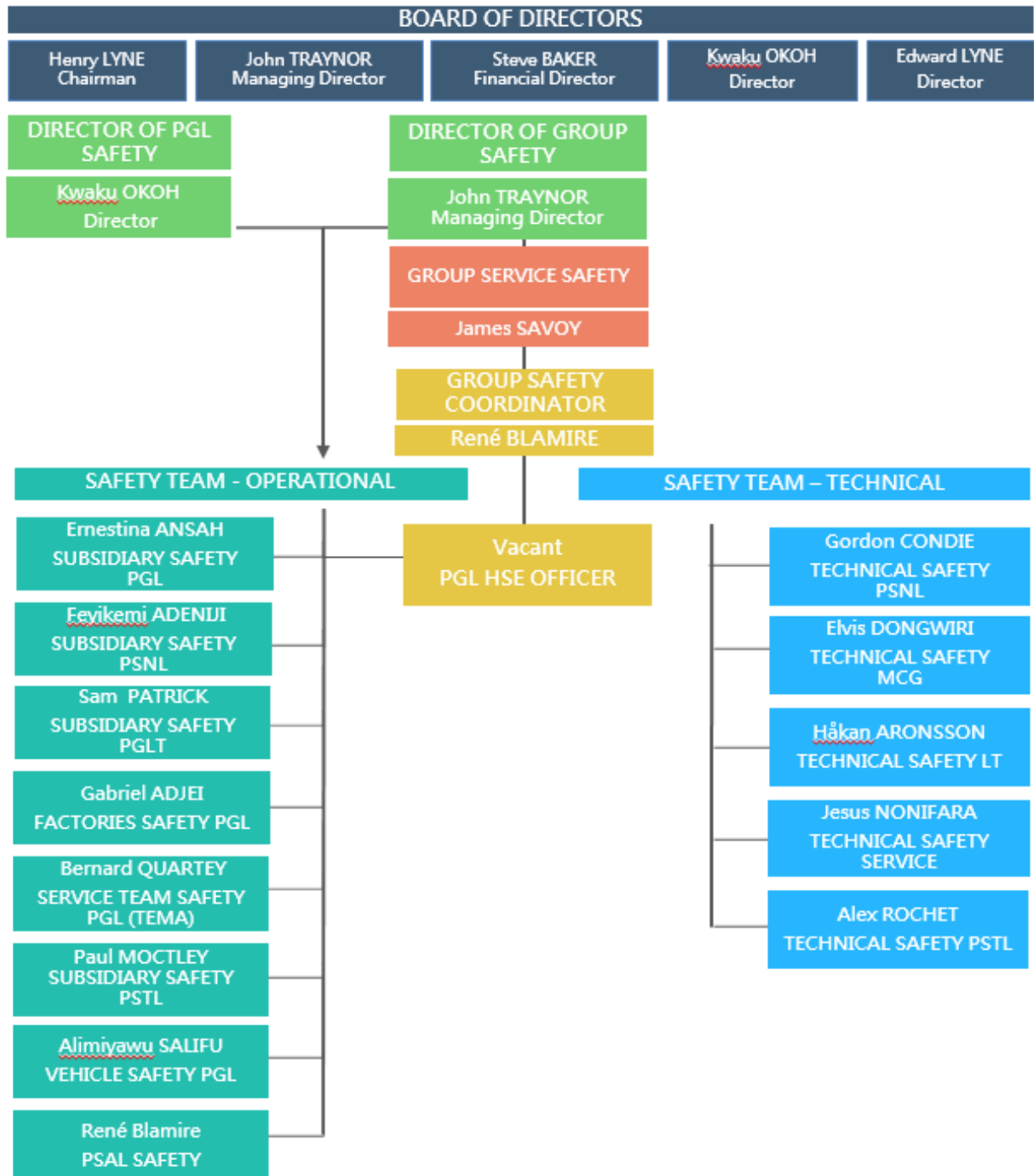
### EMPLOYEES

Regardless of position or role, all staff must take responsibility for their safety and for those around them. Staff are encouraged to participate and contribute to the Health and Safety culture of the organisation.



## SAFETY ORGANISATION CHART

### GROUP SAFETY STRUCTURE



## HSE RISK REGISTER

The risk register is intended to identify, record, and communicate risks in terms of their comparative importance to the Group. Its key function is to provide Management and Staff at all levels with significant information on the main risks faced by the division and the relevant policies and systems in place to negate/reduce these risks to a suitable level. The risk register is a live document and the nature of the risks and their subsequent ratings may change as the business evolves. The HSE Team is responsible for the compilation of the risk register and to take an objective view of risks, assess their relative importance, and assign priorities. Any risk recorded in the risk register will have an associated risk assessment.

The risk register will help management to:

- Understand the nature of the risks the division faces;
- Be aware of the extent of those risks;
- Identify the level of risk that they are willing to accept;
- Recognize its ability to control and reduce risk

## HSE RISK ASSESSMENTS AND JOB SAFETY ANALYSES

To protect staff and the business, quantitative risk assessments (RAs) are carried out on all risks identified in the Risk Register.

The risk assessment will:

- Identify the hazards
- Decide who might be harmed and how
- Evaluate the risks and decide on control measures
- Record findings and implement them
- Review the assessment and update if and when necessary

In addition, Job Safety Analyses (JSAs) are carried out on all task based risks.

## HSE NON CONFORMANCE, CORRECTIVE AND PREVENTATIVE ACTION

Non-conformance may be identified through a variety of channels but the action taken will remain the same, ie.

- Identify the **non-conformity** or potential non-conformity,
- Recommend a course of **corrective action** and follow through to completion
- Take **preventative action** to ensure that the non-conformity or similar non-conformities will not happen again.
- Ensure that results are communicated to all involved parties.

Any member of the Safety Management Team may bring attention to a non-conformance or potential non-conformance at any time. A report will be raised and sent by email to the HSE Team who will in turn inform the Managing Director. Action will be taken accordingly. The Managing Director may be approached in the first instance if the reporting member of staff does not wish to involve his line manager or go via the immediate reporting process.

The importance of near miss reporting /preventative action reporting is emphasised to all staff as being the important tool which may prevent incidents or accidents occurring in the future.

## AUDITING

Auditing and monitoring is an essential management tool in the development and implementation of health and safety management systems. This enables reinforcement, maintenance and development of the management system to reduce and eliminate risk wherever possible.

Paterson Simons & Co. (Africa) Limited will conduct internal and external auditing of all aspects of the Health and Safety Management Plan, in order to ensure compliance and to determine the gap between what is planned and what is achieved.

The company is incorporating a Safety Management System which adheres to OHSAS 18001 with the aim of achieving certification by the end of 2018.

## COMMUNICATION AND REVIEW STRATEGY

Health and safety will be communicated and reviewed by the following methods:

- HSE induction for new starters
- Weekly tool box talks to service teams
- HSE Bulletins pasted at vantage points
- Weekly HSE update is circulated to all Safety Managers and Directors responsible for Safety throughout the group
- HSE Signs: Signs will be used to warn workers of existing hazards
- Visitors: Visitors entering operational areas will be given an outlined briefing of the hazards they are to expect and their responsibilities. The company will, where applicable, provide PPE
- Meetings will be used to regularly review findings of RAs and JSAs, review policy, discuss HSE training and audits. Meetings are as follows:
  - Board of Directors meetings
  - QSHE management review meetings
  - Staff meetings

This policy will be regularly reviewed to ensure that it meets the current demands of the organisation.

## ACCIDENT / INCIDENT INVESTIGATION & REPORTING POLICY

All injuries or incidents however small must be reported at the earliest opportunity and injury details in the subsidiary accident book. The company, must comply with the Reporting of Injuries and Dangerous Occurrence Regulations (RIDDOR) with regard to the reporting of certain specified injuries and occurrences to the Authorities. Near misses must also be reported and these are encouraged, as they are an important tool in preventative action.

## TRAINING

All staff must receive HSE Training appropriate to the work they carry out, and the tasks that they are carrying out. This takes the form of HSE induction for all new staff, intermittent HSE Training throughout the year, and regular tool box talks for engineers and factories staff.

Service and factory staff must receive additional training appropriate to their needs, and this training is to be assessed and organised by their department managers.

Training Matrices must have a safety training tag which allows easy identification of individual staffs HSE training requirements.

## WASTE MANAGEMENT & ENVIRONMENTAL POLICY

Paterson Simons and Co (Africa) Ltd believes that we have a responsibility to care for and protect the environment in which we operate. We are fully committed to improving environmental performance across all of our business activities.

Paterson Simons recognises our key impacts to be in the areas of: energy use; waste generation; transport & procurement

We will strive to:

- Adopt the highest environmental & waste management standards in all areas of operation.
- Assess our organisational activities and identify areas where we can minimise impacts.
- Minimise waste through careful and efficient use of all materials and energy.
- Comply with waste management legislation.
- Reduce the environmental impact of waste disposal by reusing and recycling wherever possible.
- Liaise with our partners to ensure the safe handling and storage of waste on site.
- Purchase sustainable products wherever feasible [e.g. recycled, FSC or low environmental impact products and energy from renewable sources].
- Train employees in good environmental practice and encourage employee involvement in environmental action.
- Continually assess the environmental impact of all our operations.
- Non-compliance issues will be registered and actioned by the HSE team.



## SAFETY GUIDELINES FOR WORKING ON LIFTING EQUIPMENT

Only competent engineers/technicians are authorised to carry out work on behalf of the company. Engineers/technicians must always complete or ensure that there is a risk assessment in place before commencing any non-routine operations, and any amendments must be reported immediately to management before work commences.

Engineers/Technicians should ensure they are fully conversant with the capacity and load restrictions of the equipment. Engineers/Technicians must exercise extreme caution when working in adverse weather conditions. Manufacturer's instructions should make recommendations on how to safely undertake maintenance of their equipment and, unless there are good reasons otherwise, these should always be followed. It is the responsibility of the Technical Safety Representative to ensure that all teams are informed of, and carry out safe practices.

All members of the service team should feel empowered to stop work at any time, with the agreement of their manager and supported by the completed risk assessments, if they feel they or their colleagues are at risk. This applies to staff at every level.

**UNAUTHORISED PERSONS MUST NEVER OPERATE LIFTING EQUIPMENT.**

## THE PROVISION AND USE OF WORK EQUIPMENT

In line with the Provision and Use of Work Equipment Regulations (PUWER) 1998 the company will ensure that any work equipment provided is suitable for the specific task and environment for which it is to be used. Work equipment includes hand tools, power tools, portable plant, single machines, mobile equipment and mechanical plant. The company ensures suitable and sufficient risk assessments are conducted for all work equipment and carried out without delay. Any identified equipment deficiencies, which could potentially result in risk of damage or injury, must be brought to the attention of management immediately and the equipment taken out of use and isolated. The company ensures adequate safety procedures are displayed and/or communicated to all operatives and operatives of equipment are adequately trained

## PERSONAL PROTECTIVE EQUIPMENT (PPE)

Personal Protection Equipment will be provided to all employees as a control measure where hazards cannot be totally eliminated or adequately controlled by more effective control methods such as elimination, engineering or administration. Defective or worn PPE must be reported to the Line Manager.



## DSE & OFFICE ERGONOMICS

Training in correct use of DSE and office ergonomics must be covered in the HSE induction. Staff should report to the QHSE Team or their Line Manager if they have any concerns or issues regarding the points below. As well as providing training to employers for correct DSE use, the company has laid out the general rules which can be found in the document “HSE GUIDELINES FOR ALL STAFF”.

- Adequate lighting
- Adequate contrast
- No glare or distracting reflections
- Distracting noise minimised
- Leg room and clearances to allow postural changes
- Window covering if needed to minimise glare
- Software: appropriate to task, adapted to user, providing feedback on system status
- Screen: stable image, adjustable, readable, glare/reflection-free
- Keyboard: usable, adjustable, detachable, legible
- Work surface: with space for flexible arrangement of equipment and documents; glare-free
- Chair: stable and adjustable, a footrest can be provided if required

## MEDICAL HEALTH POLICY

### MEDICAL SCREENING

Pre-medical screening is mandatory for all expatriated service staff commencing employment with the company, to ensure that they are medically fit before commencing the job. In addition, a medical assessment may be required for immigration purposes, depending on the country of posting.

### FIRST AID FACILITY

Where applicable, Site first aid facilities will be installed to provide first aid and emergency services to all employees in the company. First aid kits are provided in offices, workshop, vehicles, and other appropriate places. Sterile medical kits are provided in the case of remote sites, and staff are instructed to take these with them for any planned or unscheduled hospital or clinic visits.

### MEDICAL INSURANCE

Ex-patriate employees are covered by private medical insurance prior to commencing their placement on site. Procedures are in place for accident and emergencies, and a database of reputable local hospitals and clinics is kept in the service department



## CONTRACT WORKERS

The suitability of sub-contractor is most important when recruiting for contract workers. – The recruiting manager must ensure they have sufficient skills and knowledge to do the job safely and without risks to health and safety. When employing workers on contact it is important to:

- Assess the risks of the work – the level of risk will depend on the nature of the job. Whatever the risk, we will need to consider the health and safety implications
- A risk assessment should be completed, the recruiting manager and contractor should be aware of its findings. The contractor must assess the risks for the contracted work and then both sides must get together to consider any risks from each other's work that could affect the health and safety of the workforce or anyone else
- Information instruction and training must be provided on the risks from the activities and the controls which are in place. It may also be beneficial to consider, with the contractor, what instruction and training contractors will need
- Liaison arrangements must be set up for co-operation and co-ordination with all those responsible to ensure the health and safety of everyone in the workplace
- Management and supervision of the work of the contractors and agreement on the nature of the controls should be planned before work starts

## FIRE SAFETY POLICY

As per the Regulatory Reform (Fire Safety) Order 2005 [FSO]. the purpose of this policy is to ensure the safety from fire of all relevant persons on, or in the vicinity of the premises by effective planning, organisation, control, monitoring and review of the preventive and protective measures. This policy will be used to ensure the provision of suitable and sufficient general fire precautions, assessment of risk and management of necessary fire safety arrangements. The Operational Safety Representatives will be responsible for the provision of safety assistance to assist the responsible person in carrying out their duties under the FSO. A suitable and sufficient fire risk assessment will be prepared, regularly reviewed, and its significant findings acted upon. A suitable and sufficient fire emergency plan will be prepared, regularly reviewed, and practised by the regular carrying out fire drills.

All staff will be trained to satisfactorily carry out the fire emergency plan, regular fire drills and any other necessary actions to comply with the FSO. Employees will be provided with comprehensible and relevant information regarding the risks identified from the risk assessment and any other notification of risk by other employees, the preventative and protective measures, the fire emergency plan, and the identities of persons nominated to carry out the duties of the responsible person. The employer of any contractor working on the premises will be provided with the same information as the responsible person's employees. All necessary systems required as part of the general fire precautions (or other general systems or appliances required to be satisfactorily maintained to prevent the likelihood of fire) will be tested and maintained in accordance with the relevant code of practice. Full records of these measures will be kept.



## FLOOD SAFETY POLICY

The purpose of this policy is to ensure the safety from flood of all relevant persons and property on, in or around the vicinity of the premises by effective planning, organisation, control, monitoring and review of the preventive and protective measures. The company recognises that during seasonal rains some subsidiary premises may be subject to flood.

This policy will be used to ensure the provision of suitable and sufficient general flood precautions, assessment of risk and management of necessary flood safety arrangements. As such the following will be provided;

Flood Action Plan – All staff must be familiarised with the Flood Action Plan which is to be followed if the premises are considered at risk of flood.

The Operational Safety Representatives will be responsible for the provision of safety assistance to assist the responsible person in carrying out their duties under the Flood Safety Policy. • A suitable and sufficient flood risk assessment will be prepared, regularly reviewed, and its significant findings acted upon. • A suitable and sufficient flood emergency plan will be prepared, regularly reviewed. •

All staff will be trained to satisfactorily carry out the flood emergency plan, and any other necessary actions to comply with the Flood Safety Plan. • Employees will be provided with comprehensible and relevant information regarding the risks identified from the risk assessment and any other notification of risk by other employees, the preventative and protective measures, the flood emergency plan, and the identities of persons nominated to carry out the duties of the responsible person. •

The employer of any contractors working on the premises, will be provided with the same information as the responsible person's employees. • All necessary systems required as part of the general flood precautions (or other general systems or appliances required to be satisfactorily maintained to prevent the likelihood of flood) will be tested and maintained in accordance with the relevant code of practice. Full records of these measures will

## GOOD HOUSEKEEPING

Effective housekeeping can eliminate some workplace hazards and help get a job done safely and properly. Poor housekeeping can frequently contribute to accidents by hiding hazards that cause injuries. Housekeeping is not just cleanliness. It includes keeping work areas neat and orderly; maintaining halls and floors free of slip and trip hazards; and removing of waste materials (e.g., paper, cardboard) and other fire hazards from work areas. It also requires paying attention to important details such as the layout of the whole workplace, aisle marking, the adequacy of storage facilities, and maintenance. Good housekeeping is also a basic part of accident and fire prevention. As well as providing training to employers for good housekeeping, the company has laid out the general rules which can be found in the document "HSE GUIDELINES FOR ALL STAFF".

## SAFE BEHAVIOUR

Safe behaviour as part of the Group's safety culture should be observed at all times. Office staff will have periodic safety training while engineers and technical staff will have a more rigorous training programme consisting of product training and regular toolbox talks.

Staff must be correctly dressed in appropriate workwear, and staff on site visits will present a professional image for the organisation in appearance, attitude and work habits.

Staff are encouraged to make suggestions which will in improving safety, and to notify their manager or supervisor of any unsafe conditions or practice. The "No blame" culture means that any observations are welcomed and not treated as criticisms.

Practical jokes and horseplay are never tolerated.

## SUBSTANCE ABUSE POLICY STATEMENT

Paterson Simons & Co. (Africa) Limited recognizes the value of their employees and is committed to the promoting and maintaining the health, safety and wellbeing of every member of their workforce.

All employees and clients engaged to work on behalf of, or at the direction of the company, have a responsibility to be present for work and remain unimpaired by alcohol and other drugs.

It shall be a dismissible offence to bring alcohol or illicit substances to use, sell, transfer or be under the influence of alcohol or other drugs on company premises. It is also a dismissible offense to drive company vehicles under the influence of alcohol or other drugs.

Passive smoke is also identified as a health risk. Therefore in the interests of the health and safety of employees, smoking is prohibited in any confined or enclosed area such as Offices Vehicles Conference and meeting rooms Storage areas Lunch rooms and toilets

Managers and Heads of departments are responsible for the implementation of this policy in their area of responsibility.



## SIGNED DECLARATION

Please read below and sign. If you are unclear on anything please do check first before signing, with the relevant person as outlined on Page 2 of this document.

I, .....

confirm that I have read and fully understand the Paterson Simons Health and Safety Policy, and am able to access the company's Health & Safety Library located on the server:

L:\Team Folders\PSAL Group\GROUP HSE

I understand that the company has a duty of care towards me as an employee, and that I also have a duty of care to myself and others within the organisation. I agree to comply to the work safely rules. If I observe anything that fails to meet the rules, or have any concerns I will highlight it to the responsible person immediately.

Signed .....

Print name.....

Date.....