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|  <small>people power</small> | <h1 style="margin: 0;">OHWSE Policy</h1> | Issue date: 10-Nov-21 |
| Doc No: POL002 | Author : Aleksandra Szul-Thomas | Issue No : 1 |

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Purpose

Smart Solutions (Recruitment) Ltd (SSR) has an important duty, in the conduct of its business operations, to ensure a safe and healthy working environment for all its employees. The Company accepts the fact that this implies a corresponding duty of ensuring that necessary organisation, equipment and training is provided to fulfil this obligation.

Smart Solutions is committed to operating the business in accordance with the Health and Safety at Work etc. Act 1974 and all applicable regulations made under the Act, so far as reasonably practicable.

Organisation in Support of OHWSE Policy

The ultimate responsibility for Health and Safety lies with the Chief Executive Officer (CEO).

Smart Solutions will identify and appoint key members of staff who are accountable to the CEO for ensuring that the detailed arrangements for safe working are drawn up, implemented and maintained.

Responsibilities

Chief Executive Officer

The CEO has the ultimate responsibility for OHWSE within the Company and shall:

- Promote a positive OHWSE culture by demonstrating clear commitment to achieving high standards of OHWSE management and encouraging the involvement of all employees in improving standards and arrangements,
- Establish and ensure effective delivery of OHWSE policies and management arrangements
- Ensure adequate resources, proportionate to the level of risk, are made available for the effective implementation of this policy and any associated management arrangements, including the maintenance of premises, facilities and equipment and the delivery of adequate training to employees,
- Ensure that OHWSE management is an integral part of the organisation's plans/strategies and that all activities are delivered in a manner which is fully compliant with relevant legal standards and consistent with best practice,
- Ensure that OHWSE performance is reviewed at least annually

Directors

The role of Company Directors is to:

- Be responsible for providing leadership, direction and oversight when setting the policy for delivering effective performance in OHWSE and risk management;
- Ensure that management systems provide for effective monitoring and reporting of OHWSE performance, more specifically, ensuring compliance with Health and Safety legislative requirements within management responsibilities as identified within this policy.
- Keep themselves informed of any significant OHWSE failures and of the outcomes of the investigation into their causes;
- Ensure that all decisions made by the company take into consideration the impact that the decision will have on the OHWSE of employees and others;
- Ensure that the OHWSE policy statement, organisation and arrangements are reviewed at least annually, kept up-to-date, understood and effectively implemented.
- Help to set performance standards for H&S;
- Monitor performance (e.g. by reviewing reports and statistics) and initiate corrective action where necessary.

Line Managers

It is the role of all Line Managers to provide advice, support and leadership to all their staff to ensure safe-working conditions at all time. In order to achieve this goal, they shall:

- Assume day-to-day responsibility for the implementation and maintenance of standards throughout their office and/or site environments
- Assist others in fulfilling their objectives and responsibilities
- Undertake a programme of local audits and inspections to make sure that all requirements of the OHWSE policy are adhered to
- Demonstrate their personal commitment by setting the highest standards for OHWSE at all times.
- Instruct each employee as necessary in the avoidance of hazards and in the safe performance of work.

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- Ensure those employees under their control understand the requirements of the OHWSE policy and comply with the arrangements.
- Investigate or participate in the investigation all incidents leading to injury, damage or loss, and report as required
- In the event of an incident to take any action necessary to deal with the situation.
- Recommend improvements or changes required to eliminate hazards and remove the causes of accidents, damage and loss.
- Monitor the work of others and stimulate their interest, involvement and commitment to H&S.
- Work with all disciplines in reviewing, inspecting and improving work systems with the objective of improving OHWSE performance.

All staff

All employees of the company shall:

- Carry out their work safely in the interest of themselves and other employees
- Understand and follow safety procedures, standards and systems of work
- Report unsafe conditions to their line manager so that corrective action can be taken
- Impart knowledge and experience on safe working practices to others
- Support the Line Managers to achieve and maintain the highest standards within the fields of Health and Safety.

Arrangements in Support of OHWSE Policy

1. Training and capabilities

All employees will receive an OHWSE induction on commencement of employment and will receive job specific information, instruction and training relative to the work activities that they are undertaking.

A training matrix, maintained by Human Resources (HR) Department, will identify who requires what safety training and when this training will be completed.

Smart Solutions (Recruitment) Ltd. (SSR) will provide regular ‘refresher’ training in OHWSE matters for all employees to ensure they are kept up-to-date with new knowledge and experience regarding risks in the work environment and the controls they must use to mitigate the risks to an acceptable level.

All employee OHWSE training will be formally recorded and records kept with the HR Department.

All our staff who are permanently or temporality working from a Client’s site will be required to undergo any additional training as required by the client relevant to the role being undertaken.

2. Consultation and Information

SSR is committed to ensuring that consultation measures are in place to inform workers of any OHWSE matter that is likely to affect them. Employees will be informed of existing OHWSE provisions upon commencement of employment and will have access to all relevant policies and procedures.

Employees will be consulted, as appropriate, in respect of any changes to their workplace or work equipment. Consultation with employees shall be facilitated through staff representatives and key post holders within the OHWSE organisational infrastructure.

An OHWSE notice board will be erected in a prominent location within all areas occupied by SSR staff and this will display information relevant to the OHWSE management of the business.

Suitable and sufficient signs and notices will be positioned to advise staff and others on OHWSE items such as what to do in the event of a fire, the location of the nearest fire exits, position of fire exit, etc.

Whenever our workplaces are shared with other companies or form part of a shared facility, SSR require representatives of our facility to co-operate and consult with affected parties on all matters of OHWSE.

3. Access to Competent OHWSE Advice and Support

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SSR will ensure that there is access to a competent person who can advise and support on OHWSE matters including the technical and legal aspects of compliance. Ideally, this will be in-house resource but if this is not possible an external resource (e.g. a consultant) will be employed on a set number of days per year.

SSR expects that directors and line managers will take full responsibility for OHSWE matters to ensure effective controls are identified, implemented and maintained and will utilise the OHWSE consultant in support of this who will provide them with timely advice and assistance.

4. Health and Safety Meetings

SSR requires that each business area provide a representative to attend OHWSE staff meeting to provide a balanced representation of the workforce. Meetings will be held on a regular basis (with a minimum of four meetings per year) with minutes of the meetings produced and distributed for information purposes.

This could be a 'standalone' meeting or be included within another meeting where safety is an agenda item.

Members of the meeting will be nominated by management to assist in the implementation of the OHWSE policy requirements and shall:

- Support Smart Solutions to implement agreed OHWSE improvement actions and to provide a focus for two-way communications (between management and employees).
- Monitor and co-ordinate all facets of OHWSE regarding employees within their teams;
- Bring staff OHWSE concerns to the attention of the relevant Line Manager
- Actively assist in the development and promotion of a positive OHWSE culture
- Assist in the development and implementation of policies, procedures and guidance.
- Attend as required the OHWSE staff meetings or when not available arrange for a representative to attend in their place.

5. Risk Assessment

All activities undertaken by SSR that have a potential to cause harm will be risk assessed. We will train selected individuals to complete this work and the contents of the risk assessments will be communicated to all affected parties. It is the responsibility of area/branch managers to ensure a sufficient and satisfactory assessment has been made of the risks to staff and others to which they may be exposed to during work activities.

All completed risk assessments will be stored in a central location and will be reviewed at least annually. A copy of completed risk assessments should be made available to all affected staff.

Risk assessments will consider the needs of vulnerable workers e.g. disabled staff, young persons and new or expectant mothers

A risk assessment procedure has been developed in support of this policy which highlights the process to be followed when undertaking assessment of risk.

Those working at other Clients' premises will be required to abide by the controls measures identified by any risk assessments undertaken by that employer. All new clients will be assessed prior to any contract being agreed to ensure that they have suitable HS&E arrangements in place to look after us when we are working on their site.

6. Display Screen Equipment (DSE)

SSR policy is that staff who use DSE are not put at unnecessary risk and that a DSE assessment of every workstation is undertaken by a competent person with suitable controls implemented as a result of these assessments.

All equipment and furniture used in association with DSE will be provided by SSR and comply with 'best practice'. Staff will be provided with relevant information on a regular basis on how to set up their workstations for safe use.

A DSE assessment procedure has been developed in support of this policy which highlights the process to be followed when undertaking assessment of DSE risk.

7. Staff Travel

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All staff travel should be risk assessed to ensure that the hazards and associated controls relevant to the trip are suitably addressed.

This may include (but not be limited to) consideration of the following:

- Theft and violence (e.g. theft of the product they carry, or money, or even the vehicle).
- Hazards on client's premises.
- Time of travel
- Location
- General hazards associated with 'working alone' - who do they call in an emergency, what do they do if they have an accident, etc.?
- Health hazards associated with foreign travel (e.g. COVID restrictions)

8. Welfare Arrangements

SSR aims to provide all employees with adequate facilities for their welfare whilst at work. This includes:

- Availability of enough clean and working toilets, separated for female and male employees where practicable.
- Drinking water (mains or bottled).
- Regular cleaning of office, storage and other spaces.
- A comfortable temperature and good ventilation.
- Adequate lighting
- Adequate desk space and storage space.
- Arrangements for storage for food, meals and breaks.
- Facilities for pregnant and nursing mothers (where required).
- Compliance with legislation concerning smoking laws.

9. Driving and Vehicle Safety

All vehicles owned, leased or used by employees of SSR should be fit for purpose and suitably insured. It is the responsibility of the drivers of vehicles to inspect them for obvious defects prior to use and report concerns to their line manager and not use them if they are not safe to drive.

National and site speed limits shall be observed at all times when travelling on company business with breaks taken every 2-3 hours to rest and recover.

The use of mobile phones when driving is prohibited, and it is recommended that employees park in a safe place with the engine switched off to make and return calls. Where necessary, hands-free devices should be used.

Staff who drive on company business will be required to produce, for inspection, a copy of their driving licence on an annual basis.

10. Work Equipment

SSR will ensure that work equipment is designed, constructed or adapted to be suitable for the purpose for which it is being used or provided. It will be fitted with any necessary safety guards or devices and safety warning signs and only used by trained and authorised people.

All work equipment, including portable electrical appliances, will be maintained in efficient working order and in good repair with records kept. This will include the requirements for statutory inspection, where applicable.

The use of hazardous work equipment is controlled through the risk assessment process with workers being provided with adequate safety information, instruction, and training prior to the use of that work equipment.

It is the responsibility of all employees to report immediately to their line manager if they suspect that work equipment is faulty or damaged.

11. Personal Protective Equipment (PPE)

SSR will ensure adequate (and free) provision and use of PPE where it has been identified as necessary by risk assessment.

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Where provided, workers are required to wear such equipment without exception. Lost or damaged equipment will be replaced, but workers must report such loss or damage to their line manager at the earliest opportunity.

12. First Aid

SSR will ensure adequate first aid provision at every place of work that we occupy. This will include a suitable number of first aiders along with a first aid box that will be marked and be easily accessible to all employees.

First Aiders are covered by our insurers for administering first aid (whilst they are officially at work) to staff, customers and visitors who are either on the premises or in the vicinity of our managed buildings.

It is the responsibility of the designated first aider to:

- Ensure adequate first aid provision is available and that the contents of the first aid boxes are kept up to date, leading to a good balance of equipment and capacity.
- Ensure in the event of administering first aid, the completion of incident report forms

All staff shall ensure that if necessary, the alarm is raised at the earliest opportunity so that first aid and/or medical support can be provided to physically injured or medically ill persons.

The names of qualified first aiders will be displayed on the OHWSE notice board and published on Company's Intranet.

13. Hazardous Substances

SSR will ensure the safety of all employees who are likely to be exposed to hazardous substances as part of their work activity.

To ensure compliance with relevant chemical regulations SSR will:

- Compile and maintain an inventory of all hazardous substances used;
- Obtain data sheets from manufacturers on each substance used and carry out risk assessments of hazardous substances and review as necessary
- Undertake a hazardous substance risk assessment of the hazards presented by the products used
- Introduce suitable and sufficient control measures to prevent / minimise risks
- Provide training to all employees who are likely to be exposed
- Issue method statements for the use and storage of all hazardous substances used.

Employees will be made aware of any substances that they use during their working day and should make proper use of control measures.

14. Asbestos

SSR recognises its responsibilities to protect employees and others from the harmful effects of asbestos. We shall:

- survey of all our buildings to find out if asbestos is likely to be present,
- maintain a register of all areas where asbestos is present and introduce suitable controls for monitoring, maintaining an, if necessary, removal.

If maintenance or refurbishment works are to take place in areas where asbestos is known to be present, a full and detailed risk assessment will be required prior to the commencement of the works.

15. Legionella

SSR recognises the need to protect staff and others from risks associated with the harmful effects of legionella.

The control of legionella is a continuing responsibility and we will take reasonable steps to prevent its proliferation and transmission via water systems.

Legionella will be managed following risk assessment protocols, relevant legislation and best practice in controlling bacteria in water systems. This will be achieved by ensuring that a survey is completed a

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Legionella survey of the buildings under our control and implementing a management plan to maintain standards.

16. Drug/Alcohol

Misuse of alcohol or other substances can affect the safety of staff and others and lead to increased absenteeism due to the decline in the general health and wellbeing of individuals.

SSR policy is such that the consumption of alcohol and the taking of any non-medication drugs is strictly prohibited during the hours of work and that employees will not be under the influence of drugs or alcohol during working hours.

Any member of staff who is concerned that he/she may have a dependence on alcohol or drugs is encouraged to seek help and advice from their Doctor, line manager or a member of the HR team. Every assistance will be offered to help the employee in these circumstances and the information will be held in the strictest confidence.

A Drug and Alcohol policy & procedure (*Alcohol & Substances Abuse Policy SSR025*) has been developed in support of this policy which highlights the requirements of SSR of this topic in greater detail including the right to undertake random drug tests along with due cause testing.

17. Occupational Health and Health Surveillance

SSR will take all practicable measures for the prevention and control of any occupational ill health of employees.

This will include a review of the workplace, workstation, task management and equipment, along with the use of alternatives to hazardous substances, monitoring of exposure levels, health surveillance, provision of PPE and task management.

Staff will be required to complete a 'post-employment' medical questionnaire which will be held securely during their period of employment and they shall immediately report to their supervisor or manager any change in their health or if they suspect that they are becoming unwell as a result of any work activity. In addition, those staff who regular work night shifts will be required to complete a separate annual questionnaire to help determine their suitability and requirements for working these hours.

SSR will utilise the services of external OH providers on an ad hoc basis to support us with these objectives with referrals arranged on an as needed basis.

18. Fire Safety

SSR will provide and maintain suitable fire arrangements throughout the buildings under our control based on the findings of fire risk assessments that will be reviewed annually and reassessed every 3 years (or when required) by competent persons.

Any person discovering a fire is to raise the alarm immediately to ensure that all other persons within the building are aware of the emergency.

- On hearing the alarm all persons are to assemble outside the building in the designated assembly area using the nearest safe exit.
- Once assembled, a responsible person will check that all staff and others are present and liaise with the emergency services and on no account, should anyone re-enter the building until they have been advised that it is safe to do so.

A fire procedure has been developed in support of this policy which highlights the requirements of SSR in greater detail for each of the premises under our control including the requirement to establish and maintain a fire log book.

All SSR employees located on Client's premises must familiarise themselves and adhere to the fire procedures on that site.

19. Manual Handling

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Assessments will be completed for manual handling tasks carried out by employees of SSR using the standard risk assessment form (SSD121) with the necessary precautions taken as a result.

To minimise the risk to staff from manual handling SSR policy is to avoid the need to lift or manoeuvre objects, or introducing suitable equipment to assist the activity. Lifting aids or team lifting should be utilised when moving heavy or bulky items.

Where necessary, employees will be given training, both in how to recognise potentially hazardous lifting situations and in the techniques of good handling practice.

Staff are to take care and pay attention when undertaking manual handling tasks to minimise the risk of injury to themselves.

20. Housekeeping, Environment & Waste Management

Housekeeping should be maintained to the highest possible standard within the facilities under the control of SSR.

Items should be stored in designated areas with special care taken when storing items above head height. This will include restricted areas where items are not to be located with additional precautions taken to minimise the danger to staff from falling items. No items should be stored where they can block fire exits, fire equipment or escape routes or increase the risk from fire.

We will endeavour to comply with all environmental requirements imposed upon us by legislation and our clients and will consider the environment wherever we operate. This will include the completion of an aspects/impacts register on an annual basis to allow us to assess where we impact the environment and help decide how we can minimise this effect.

SSR will provide suitable receptacles and bins to allow materials and equipment to be stored in an appropriate manner. Where practicable, SSR will encourage the culture of recycling and correct waste disposal and will follow the ‘best practice’ principal of REDUCE, REUSE, RECYCLE Where waste, including hazardous waste, is required to be passed to third parties we will ensure that this is done in accordance with relevant legislation and ensure that records of transfer are recorded.

A monthly housekeeping check will be undertaken in each of our offices to ensure that this standard is maintained.

21. Contractor Control

SSR requires that all contractors working on our behalf have appropriate arrangements in place that meet the minimum requirements of the OHWSE as set out in this policy and are able to provide us with suitable and sufficient method statements and/or risk assessments prior to the commencement of the work.

All work undertaken on or within SSR facilities will be monitored and controlled to ensure the safety of the work being undertaken and to protect staff and customers, where applicable.

All equipment that is brought to site by contractors should be suitable for the task and have the necessary examination certificates available for inspection.

All branch managers are responsible for the upkeep of all offices, sourcing relevant approved contractors. All branch managers should raise all issues and concerns to their Managing Directors (MD).

A Supplier Evaluation procedure has been developed in support of this policy which highlights the process to be followed when contractors are undertaking work for SSR. This will be shared with all regular contractors who work on our behalf.

22. Visitors

To ensure the safety of those who visit our Head Office, there is a requirement that they sign in and are met by their host who instructs them as to the OHWSE requirements for the building and take responsibility for them at all times. Visitors are also required to sign out when they leave the building. It is the responsibility of the host to ensure that this happens.

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SSR' visitors at clients' sites should comply with the OHWSE rules and arrangements on that site.

Clear signage directing people to escape routes, emergency evacuation meeting points, the location of firefighting equipment and first aid stations, etc. are all especially important for visitors in case they get separated from their host when an emergency situation arises.

23. Security

SSR recognises the need to ensure the security of its staff and property. To meet this goal, Line Managers are responsible for ensuring the following:

- Restricted areas and information within the building are identified and secured
- Selected staff are trained in responding to aggressive or challenging behaviour.
- Minimise lone working
- Ensure the safety and security of staff at all times

24. Lone Working

SSR recognises that it has a duty to protect the Health and Safety of its staff who are working alone so it is our policy to prevent lone working wherever practicable. Line managers are responsible for:

- Advising staff working alone about security and safety measures to be taken.
- Advising site management where appropriate of staff working alone.
- Ensuring that staff are able to raise the alarm in the event of an emergency and can be contacted at all times.

Lone Working procedure has been developed in support of this policy which highlights the requirements of SSR of this topic in greater detail, additional information on lone working can be found in our Lone Worker Policy SSR051

25. Incident Reporting & Investigation

Employees must report to their line manager, at the earliest opportunity, all accidents, incidents or near miss situations (to staff, visitors or customers) which have given rise to, or could give rise to, injury, loss or damage, including violent or aggressive incidents.

Line Managers shall ensure that a completed incident report form is forwarded to Ops Coordinator within 24 hours of the report and that appropriate remedial action is taken following the investigation in accordance with SSR Incident Reporting Procedures.

When investigating cases of sickness absence, managers shall make reasonable enquiries to determine whether the illness has a work-related cause. All cases of ill health associated with a person's occupation must be reported to HR as soon as the association is suspected.

The central team will be responsible for SSR compliance with reporting and recording requirements of certain incidents as defined by the 'Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR).

An incident reporting and investigation procedure has been developed in support of this policy which highlights the requirements of SSR of this topic in greater detail.

26. Inspection, Auditing and Monitoring

To support the requirements of this policy a number of internal audits and inspections will be identified and undertaken. The Head of Compliance will develop an audit/inspection plan and will undertake checks on key elements of the business at routine intervals as defined by the plan.

The OHWSE competent person will undertake a full management systems audit on an annual basis to identify areas for improvement and to verify compliance with this policy and associated legislation.

It is the responsibility of Branch/Area Managers to ensure that all necessary audits and inspections are undertaken, findings of the audits and inspections are actioned in a timely manner and suitable records retained for an appropriate timescale.

27. Management Review

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SSR will perform a biannual management reviews of their occupational health and wellbeing, safety and environmental arrangements as a part of their IMS.

These reviews are an essential tool to help evaluate the effectiveness, adequacy and continuing suitability of local OHWSE objectives and they provide a forum for discussions and communications, demonstrating the commitment of managers to continuously improve standards for our employees.

The reviews should consider progress against any OHWSE objectives and targets, help identify any weaknesses in Company's policies, procedures and arrangements, and help to decide on future objectives.

These meetings should be minuted, with an appropriate cross section of attendees to allow meaningful analysis of performance to take place.

Queries and Amendments

Any queries should be addressed to the Human Resources Department. Any amendments will be notified by revision of this document.