

This policy applies to all operations of Tsebo Solutions Group Holdings SA Pty Ltd (Tsebo; the Group).

Tsebo and its employees are committed to creating and maintaining a healthy and safe working environment for all its employees and for others who may be affected by its operations by:

- Providing information and training to all our employees on important health and safety matters and legislative requirements applicable to their work circumstances;
- Providing personal protective equipment to all employees and functions that require it
- Continuously improving our processes and practices relating to health and safety;
- Identifying, controlling and wherever possible reducing or eliminating health and safety risks associated with our activities and so preventing injury and ill health in all aspects of the Group’s operations;
- Eliminating hazards and reduce occupational health and safety (OH&S) risks associated with our activities;
- Providing a clear definition of health and safety responsibilities throughout Tsebo’s operations;
- Complying with the applicable regulatory, legislative, and other business requirements;
- Ensuring that health and safety concerns are considered when developing and changing business activities, processes and products;
- Providing protection to employees from reprisals when reporting incidents, hazards, risks and opportunities;
- Establishing and implementing a process for consultation and participation of employees;
- Setting objectives and targets on health and safety issues;
- Conducting managerial reviews of our performance and ensuring adequate resources are available to fulfil this policy;
- Foster and encourage open communication with Clients to allow health and safety information to be transferred effectively and to enable efficiency and accountability; and
- Monitoring and reviewing of our health and safety performance to ensure continuous improvement.

All employees, contractors and visitors are responsible for policy implementation by cooperating, participating, and contributing to its success through their actions and suggestions.

Where Tsebo employees are located on Client premises, we will collaborate with Clients to ensure appropriate OH&S measures are in place and will adhere to Client SHE measures to the extent that those measures are more onerous and extensive than those required by or differ from Tsebo.

As the CEO’s, we will ensure that this policy is reviewed periodically, at least every two years, or as legislative requires to ensure that it remains relevant and appropriate to the organisation and will be communicated to all persons working under the control of the organisation and will be made available to interested parties on request.



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1. Introduction

Tsebo is an integrated workplace management solutions provider offering services and solutions to clients in several sectors including, oil and gas, mining and resources, corporate and financial services, manufacturing, leisure and hospitality, healthcare, retail and wholesale, education, public sector as well as protection solutions.

The Occupational Health and Safety Policy strives to align to the requirements of applicable legislation as well as best practice standards, primarily ISO 45001 (Occupational Health and Safety Systems Manual) and to any internationally agreed principles, defined and developed to provide the necessary strength, flexibility, and appropriate foundation for the development of a sustainable health and safety culture throughout the Group.

2. Purpose and Objectives

The purpose of the Policy is to ensure that all stakeholders create and sustain a healthy and safe environment by eliminating or minimising the hazards that can cause accidents and injuries for all persons on Tsebo premises.

Where health and safety hazards and risks exist, the Group is committed to manage them through identification, evaluation, and implementation of control measures according to the risk profile identified.

The strategic OH&S direction of the Group will be managed through the Compliance Office of Tsebo. The OH&S compliance management system will be monitored and reviewed regularly to ensure that the processes and control measures deliver the intended outputs as well as measure the achievement of environmental objectives, improvements in waste management and minimising safety related incidents.

Compliance to the policy and applicable legislation is a mandatory requirement which benefits Tsebo as it creates a safe environment for employees, potential employees, and stakeholders, it may also, among others; distinguish it from its competitors; assists in attracting clients and suppliers; create opportunities for growth and ensure penalties are not imposed on the Group.

3. Scope

The Policy is applicable to all divisions, joint ventures controlled by Tsebo, subsidiaries, directors as well as permanent and contract employees of Tsebo.

4. Governing law

Tsebo is primarily governed by the requirements provided for in the Occupational Health and Safety Act 85 of 1993 (OHS Act) and its Regulations as it is domiciled in South Africa, but Tsebo will apply the more stringent requirements of applicable legislation to achieve and maintain compliance as an organisation operating at multiple sites and/or in multiple jurisdictions.

5. Rights and responsibilities

5.1 Responsibilities of Employer

- To provide and maintain, as far as is reasonably practicable, a working environment that is safe and without risk to the health of his employees.
- To provide such information, instructions, training, and supervision as may be necessary to ensure, as far as practicable, a healthy and safely working environments for all employees.
- Take such steps as may be reasonably practicable to eliminate or mitigate any hazard or potential hazard to the safety or health of employees, before resorting to personal protective equipment.
- To not permit, as far as practicable, any employee to do any work or to produce, process, use, handle, store or transport any article or substance or to operate any machinery, unless the precautionary measures have been taken.

- To establish as far as is reasonably practicable, what hazards to the health or safety of persons are attached to any work which is performed, any article or substance which is produced, processed, used, handled, stored, or transported and any plant or machinery which is used in the business.
- To establish and regularly review what precautionary measures should be taken with respect to such work, article, substance, plant, or machinery in order to protect the health and safety of persons and provide the necessary means to apply such precautionary measures.
- To provide personal protective clothing and/or equipment where necessary for the face, eyes, ears, hands, feet, legs, body where necessary.
- To ensure all divisions, units, functional departments, and subsidiaries comply with applicable legislation and to this policy to oversee the responsibility and accountability for health and safety within their components and working environment.

5.2 Employee Rights

All employees have the right to know the hazards at work and how to control them; the right to participate in Occupational Health and Safety as well as the right to refuse work which he/she believe to be unusually dangerous and may not be punished for using these rights.

5.3 Responsibilities of employees

Whereas Tsebo is responsible for providing employees with safe and healthy working conditions. The responsibilities of each employee are the following:

- Take reasonable care for the health and safety of him/herself and of other persons who may be affected by his/her acts or omissions, including using the appropriate PPE as required for his/her job and in accordance with clause 9 below.
- For any duty or legal requirement imposed on Tsebo or its clients, where applicable, cooperate with Tsebo and/or its clients to enable that duty or legal requirement to be performed or complied with.
- Carry out any lawful order given to him/her and obey the health and safety rules and procedures laid down by Tsebo or client of Tsebo, in the interest of health and safety.
- If any situation which is unsafe or unhealthy comes to his/her attention, as soon as practical report such situation to the Divisional SHE Manager, health, and safety representative or through the Tip Offs Anonymous line, who shall report it to the Group for investigation.
- If he/she is involved in any incident which may affect his/her health or which has caused an injury to him/herself, report such incident to the SHE Manager or health and safety representative, as soon as practicable but not later than the end of the particular working day during which the incident occurred, unless the circumstances were such that the reporting of the incident was not possible, in which case he/she shall report the incident as soon as practicable thereafter.
- To not intentionally or recklessly interfere with or misuse anything which is provided in the interest of health or safety.

6. Health and safety representatives

Health and Safety representatives must be appointed for each Division. At least one Health and Safety representative shall be appointed for every 100 employees or part thereof in the office and one for every 50 employees based on other sites. Only permanent employees who are acquainted with conditions and activities at that workplace or section thereof shall be eligible for designation as health and safety representatives for that workplace or section.

The names of those designated as Health and Safety representatives shall be made known by placing notices on the notice boards of the various workplaces.

The Representatives have duties to:

- review the effectiveness of health and safety measures;
- regularly inspect and review the workplace health and safety documents;
- identify potential hazards and potential major incidents at the workplace

- examine the causes of incidents at the workplace and/or conduct accident investigations;
- timeous reporting in accordance with Group requirements and/or instructions
- investigate complaints by any employee relating to that employee's health or safety at work;
- deal with the Health and Safety concerns of employees;
- investigate refusals to work and engage with HR to address any work performance issues;
- Meet at least once every three months and record minutes of each safety meeting.

7. Training and Awareness

Emergency training will be provided to equip the various assigned roles with specific information and knowledge to carry out their duties. The required roles will be as follows:

- First Aider
- Fire Marshall
- Emergency Controller

In-house training will be conducted to inform staff of the emergency procedures while specialised training shall be sourced from accredited service providers.

8. First aid, emergency equipment and procedures

Tsebo will take the reasonable steps that are necessary under the circumstances, to ensure that employees at work receive prompt first aid treatment in case of injury or emergency. Tsebo will provide a first aid box or boxes and applicable emergency equipment at the workplace which shall be available and accessible for the treatment of injured employees at the workplace.

9. Emergency/evacuation plan

The Group will develop a comprehensive emergency framework for implementation by each regional office regarding action to be taken in case of fire, gas, floods, bomb threats, robbery, etc. Implementation drills shall be conducted in accordance with the comprehensive emergency framework to ensure that each employee knows how to react in events of emergency.

10. Personal Protective Equipment (PPE)

All employees performing a task that requires the use of appropriate PPE shall ensure that this is available and worn at all times during the course of the task. Such equipment must be appropriate to the risks identified as part of the scope of work. All PPE shall be properly maintained and in good order. All PPE issued must be recorded, and employees trained on how to use equipment effectively. This record should be kept as part of the SHE file onsite.

11. Hazard identification and risk assessment

Health and safety hazards in the workplace must be identified through a formal hazard identification process as defined in the Hazard Identification and Risk Management Procedure.

12. HSE Objectives and Targets

The objectives and targets (as required by ISO 45001 clause 6) will reflect Tsebo's commitments to provide safe and healthy working conditions as well as minimize the Group's footprint on the environment. These will outline the steps that are taken to meet these commitments and provide the framework for the Group's Safety, Health & Environmental policy with the aim of continuous improvement.

The Health, Safety and Environmental objectives and targets are identified after considering the following:

- Group's OHS Policy
- Outcome of Inspection Reports by HSE Managers
- Significant potential incidents and risk levels

- Financial considerations
- Legal and other requirements
- Concerns of employees and interested parties
- The views of the Top management
- Historic Company performance records and audits

All details regarding Health, Safety and Environmental objectives and targets shall be recorded and HSE Managers shall monitor actual performance periodically against the set target.

13. Accident/Incident Investigation and Reporting

Employees who are involved in an accident or are a witness to an accident or incident must report the accident/incident to the designated first aider, OHS representative, OHS Manager or line manager.

All accidents/incidents that result in injury or property damage or that could have resulted in serious injury or property damage (near miss) must be thoroughly investigated. The investigation must determine the cause of the incident so that appropriate action can be taken to prevent recurrence. The investigation report shall be completed as soon as possible after the incident and reported to the Divisional SHE Manager.

In the event of an incident in which an employee dies, or is injured to such an extent that he/she is likely to die, suffer the loss of a limb or part of a limb or likely to be unable for a period of at least 14 days either to work or to continue with the activity for which he was employed or is usually employed, such incident must reported to the Department of Labour (South Africa) and Group EXCO (through the Tsebo HR and Compliance functions).

Where applicable, injuries on duty shall be captured on the prescribed forms as indicated in the Compensation for Occupational Injuries and Diseases Act (COIDA) and shall be reported to the Health and Safety representative as well as Line Management. The relevant Human Resources Management shall forward the forms to the Compensation Commissioner to register the injury on duty.

Employees are also invited to make use of the Tip Offs Anonymous Hotline should they observe or suspect any OH&S violations or incidences and wish to remain anonymous by making use of the details below:

SA Free Call: 0800 00 33 17
Email to: tsebo@tip-offs.com
International Toll-Free SMS: +27 72 014 4445.

14. Consequences of non-conformance

Unacceptable performance of health and safety duties will not be tolerated and failure to comply with the policy requirements may not only result in bodily harm and disability for employees which should be avoided at all costs, but may also result in penalties, fines, possible imprisonment and or disciplinary action for employees depending on the non-conformance. The Group may also suffer reputational repercussions because of non-conformance and personal liability for the CEOs.

15. Other Policies and Documents

This Policy should be read in conjunction with other Group Policies such as the:

- Sustainability Policy
- Health, Safety and Environmental (SHE) Manual
- All Divisional Health and Safety Policies and Procedures
- Covid-19 Policy and related document