

OCCUPATIONAL HEALTH AND SAFETY POLICY (OHS)

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(Approved by: Kerry deJager 2025)

Prepared by the Occupational Health and Safety Manager



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1. General Statement

SAPSI Health, Safety, and Welfare Policy

SAPSI is dedicated to ensuring the health, safety, and welfare of its employees, as far as is reasonably practicable. We fully accept responsibility for the well-being of other individuals who may be affected by our activities and will take all necessary steps to meet our statutory duties.

Key commitments under this policy include:

- **Management Responsibility:**
Management will ensure that all work processes and systems are designed with health and safety in mind and are always properly supervised.
- **Employee Participation:**
Adequate facilities and arrangements will be maintained to enable employees and their representatives to raise health and safety concerns effectively.
- **Appointment of Competent Personnel:**
Competent individuals, including external specialists when needed, will be appointed to assist in meeting our statutory health and safety duties.
- **Training and Information:**
Each employee will receive the necessary information, instructions, and training to perform their work activities safely.
- **Employee Cooperation:**
Every employee is required to cooperate fully in order to ensure all statutory health and safety duties are met. The successful implementation of this policy relies on the full commitment of all employees.

All employees have a legal obligation to take reasonable care for their own health and safety, as well as the safety of others who may be affected by their actions or omissions.



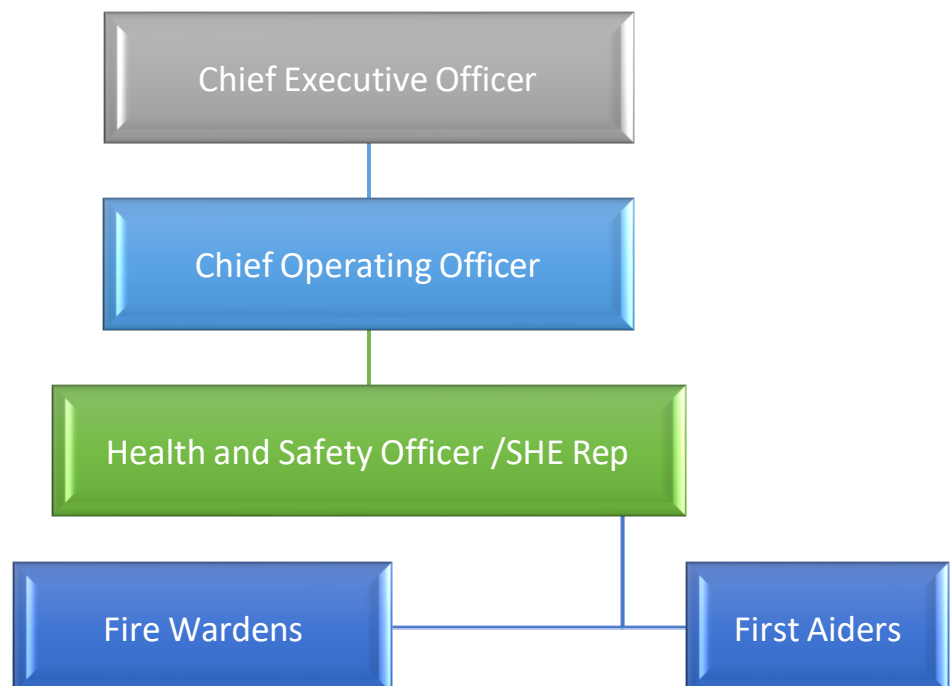
2. Organizational Responsibilities

Health and Safety Policy for SAPSI

This policy pertains to SAPSI and outlines the responsibilities for ensuring that health and safety are effectively managed within the organization.

The **Health & Safety management obligations** under this policy are overseen by the **Risk Chief Operating Officer** (COO), who serves as the chair of the Occupational Health and Safety Committee. Additionally, these obligations are integrated into the organization's governance process through the **Chief Operating Officer's** representation at the **Executive Risk Committee**.

This structure ensures that health and safety management is consistently prioritized and aligned with SAPSI's broader governance framework.



2.1 The Chief Executive Officer

Chief Executive Officer's Responsibilities for Health, Safety, and Welfare

The **Chief Executive Officer (CEO)** holds ultimate responsibility for health, safety, and welfare matters within the organization. The CEO may delegate this responsibility to the most appropriate function, as is the case at SAPSI.

The CEO shall ensure the following:

1. **Resource Allocation:**

- Appropriate resources are provided to eliminate and/or control identified hazards and to prevent the introduction of new risks.
- 2. **Accountability:**
 - Any individual who fails to adequately fulfill their health and safety responsibilities will be reprimanded as necessary and subject to disciplinary action in line with SAPSI's disciplinary procedures.
- 3. **Leadership by Example:**
 - The CEO leads by example, demonstrating high standards of application and discipline in health and safety practices.

Through these actions, the CEO ensures that health and safety remain a priority and are maintained throughout the organization.

2.2 People and Organization

Responsibilities of the Head of People and Organization | Employee Relations

The **Head of People and Organization | Employee Relations** is responsible for ensuring that occupational health and safety matters are effectively managed in line with organizational needs and legal requirements. Key responsibilities include:

1. **Policy Development:**
 - Establishing and implementing Occupational Health and Safety-related policies for staff, including policies on leave, sick leave, working conditions, mental well-being, and other relevant policies as required by the Labor Relations Act.
2. **Health and Safety Training Management:**
 - Ensuring processes are in place to manage and record relevant health and safety training for staff, ensuring compliance and ongoing education.
3. **Non-Compliance Management:**
 - Developing and overseeing a process for addressing non-compliance with health and safety policies, training requirements, and other related systems.

By fulfilling these responsibilities, the Head of People and Organization | Employee Relations contributes to a safe, compliant, and supportive work environment for all employees.

2.3 Management

Management Responsibilities in Health, Safety, and Welfare

Management plays a pivotal role in ensuring the health, safety, and welfare of staff. Key responsibilities include:

1. **Appointment of Health & Safety Representatives and Marshals:**
 - Ensure sufficient Health & Safety Representatives and Marshals are appointed in compliance with legal requirements (e.g., 1 Marshal per 100 staff members in a corporate setting).
 - Confirm that appointed individuals attend relevant training.
2. **Team Awareness and Reporting:**

- Ensure team members understand their responsibilities for reporting hazards, faulty equipment, and suggestions for improvement.
- 3. **Corrective Actions:**
 - Take prompt corrective action when unsafe acts are observed or reported.
- 4. **Workplace Safety:**
 - Maintain a work environment free from obvious hazards.
- 5. **Change Notification:**
 - Notify People and Organization of any changes in individuals' circumstances that may impact health and safety.
- 6. **Reporting Unsafe Practices:**
 - Report unsafe practices to the Health & Safety Manager for further action.

By fulfilling these responsibilities, management ensures a proactive and compliant approach to health, safety, and welfare within the organization.

2.4 Head of Facilities

Responsibilities of the Head of Facilities

The **Head of Facilities** holds overall accountability for ensuring that the tasks delegated to the Health & Safety Manager are effectively carried out. Key responsibilities include:

- **Oversight and Support:**
Providing guidance and support to the Health & Safety Manager in the execution of their duties.
- **Resource Allocation:**
Ensuring the availability of adequate resources—such as personnel, equipment, and budget—to facilitate the successful implementation of the Health & Safety Policy.

By fulfilling these responsibilities, the Head of Facilities plays a crucial role in maintaining a safe and compliant working environment while empowering the Health & Safety Manager to perform their role effectively.

2.5 The Health & Safety Manager

Responsibilities of the Health & Safety Manager

The **Health & Safety Manager** has day-to-day responsibility for health and safety matters and reports directly to the Head of Facilities. This role supports the Health & Safety Policy and ensures its effective implementation through the following key responsibilities:

Policy Implementation and Training:

- Implementing the **Health & Safety Policy** across SAPSI.
- Facilitating training and awareness of the policy, making it available on the SAPSI intranet.
- Including annual training and awareness as part of the Operational Resilience awareness program.

Risk Management:

- Conducting and reviewing risk assessments, agreeing on action plans, and monitoring their implementation.



- Evaluating the effectiveness of measures to control risks and hazards.

Contractor Management:

- Maintaining an approved contractor list, ensuring it is current.
- Verifying that contractors have and implement appropriate health and safety policies while working at SAPSI premises.

Communication and Compliance:

- Establishing effective health and safety communication systems.
- Monitoring employee compliance with the Health & Safety Policy and ensuring understanding of delegated responsibilities.

Premises and Equipment:

- Conducting regular inspections of premises and maintaining records to ensure safe working conditions.
- Monitoring welfare facilities and keeping walkways clear.
- Ensuring safety equipment, such as fire extinguishers and evacuation chairs, is in place and maintained.

Employee Support:

- Assisting with new starter induction training, including health and safety elements.
- Ensuring sufficient First Aiders, Evacuation Wardens, and Fire Wardens are trained, and their information is up to date.
- Stocking first aid boxes correctly and performing weekly defibrillator checks.

Incident Reporting and Investigation:

- Recording all reported accidents in the accident book and conducting thorough investigations.

Collaboration with Contractors:

- Liaising with building maintenance contractors and ensuring corrective actions are implemented.

Committee Management:

- Hosting quarterly **Health and Safety Committee** meetings, ensuring accurate minutes are distributed.
- Providing quarterly reports via email to committee members when meetings are not required.

Audit and Enforcement Liaison:

- Ensuring a suitable person accompanies any **Enforcement Advisor** during audits or inquiries.
- Implementing recommendations from audits or inquiries.

This comprehensive approach ensures the Health & Safety Manager promotes a safe and compliant working environment for all SAPSI employees and stakeholders.

2.6 Health and Safety Representatives

Health and Safety Representative (SHE Rep): Roles and Responsibilities

A **Health and Safety Representative** (SHE Rep) is a workplace-appointed individual responsible for representing fellow employees to ensure that risks and hazards are identified and mitigated as far as is reasonably practicable. The SHE Rep works closely with the Health and Safety Manager,



consulting and addressing all health, safety, and welfare matters affecting employees and others impacted by workplace activities.

Responsibilities of the SHE Rep (as outlined in Section 18 of the OHS Act):

- **Health and Safety Measures:**
Review the effectiveness of existing health and safety measures within the workplace for which they are appointed.
- **Hazard Identification:**
Identify potential hazards and risks in the workplace and ensure appropriate measures are taken to address them.
- **Incident Examination:**
Assist in examining the potential causes of incidents to identify preventive measures.
- **Employee Complaints:**
Help investigate employee complaints related to health and safety concerns.
- **Committee Participation:**
Attend meetings of the health and safety committee as an active member to contribute to workplace safety decisions.
- **Internal Audits:**
Participate in internal health and safety audits to ensure compliance and improvement in safety standards.

By fulfilling these responsibilities, SHE Reps play a critical role in fostering a safe and healthy working environment.

2.7 Evacuation Marshalls

Evacuation Marshalls: Appointment and Responsibilities

Sufficient **Evacuation Marshalls** will be appointed for each SAPSI office and premises. These marshals will receive training in safe evacuation procedures to effectively assist the Evacuation Team, Fire Brigade, Facilities/Building Managers, and Security staff during emergency situations.

Responsibilities of an Evacuation Marshal:

- **Area Awareness:** Be fully aware of the areas assigned to you and understand your responsibilities.
- **Building Familiarity:** Have a thorough knowledge of the entire building, especially the area you are responsible for.
- **Emergency Equipment:** Familiarize yourself with all emergency equipment available within the building.
- **Hazard Identification:** Assist Health and Safety Representatives in identifying and addressing hazardous situations in the building.
- **Emergency Assembly Point:** Know the location of the building's designated **Emergency Assembly Point** and ensure others are directed there during an evacuation.

Proper training and preparedness ensure that evacuation marshals can play a vital role in maintaining safety during emergencies.



Procedure When the Emergency Alarm Sounds:

- **Follow Instructions:** Listen carefully to directives from the Safety Manager, Emergency Controller, or Health and Safety Representatives.
- **Evacuation:** If instructed to evacuate or if the fire spreads, immediately guide people to evacuate the building.
- **Emergency Exits:** Direct individuals to the nearest and safest emergency exit route.

Advise individuals to:

- Keep to the left when descending stairs.
- Avoid using elevators.
- **In case of fire:** Close all doors and windows to prevent the spread of fire.
- **In case of a suspected bomb threat:** Open all doors and windows to minimize impact.
- Proceed to the designated Assembly Point.
- Report attendance to roll call marshals.
- **Area Sweeps:** Ensure your assigned area is clear by verifying all personnel have evacuated the building.
- **Assist the Disabled:** Use Evac-Chairs to assist disabled individuals or guide them to designated disabled refuge areas.
- **Report Completion:** After evacuation, report immediately to the Emergency Controller at the Assembly Point.

2.8 First Aiders

Sufficient First Aiders shall be appointed to individual SAPSI Offices and premises. Operational Resilience representatives embedded in the business units will assist the Safety Manager in appointing sufficient first aiders within business units and to ensure that they hold valid certificates. They will also ensure that first aid boxes are available and correctly stocked. The location of first aid boxes and the names/location of trained First Aiders will be displayed on noticeboards and on the intranet.

The principal health and safety duties of the First Aiders are as follows:

- Giving help in the form of basic medical assistance to someone who is injured or ill and taking care of them until professional medical help arrives. To attend training it is necessary to maintain a valid certificate if they are appointed as first aiders.
- In buildings where a defibrillator is provided, it should only be used by appropriately trained First Aiders.

2.9 Fire Marshalls

Sufficient Fire Marshalls shall be appointed for individual SAPSI offices and premises. They should be trained in basic firefighting and safe evacuation procedures so that they can assist the Evacuation



Team, Fire Brigade, Facilities/Building Managers and Security staff in the event of a fire or other emergency situations (E.g.: Security/bomb scare).

The Fire Marshals are responsible for:

- Promoting general fire awareness and fire safety in the workplace.
- Familiarizing themselves with the operation of fire-fighting equipment used in the workplace.
- Checking fire-fighting equipment in their workplace at least once a month to ensure it is in working order.
- Identifying items, equipment and areas in their workplace which may be a fire hazard.
- Reporting any serviced or damaged firefighting equipment or fire hazards to the Safety Manager/ HOD/manager/team leader for necessary action, and to your health & safety rep for inclusion in health and safety report.
- Checking emergency escape routes on a regular basis to ensure they are not obstructed.
- Assisting with the safe and prompt evacuation of SAPSI Offices in case of an emergency.
- Attending training as necessary.
- In an emergency, the fire marshal may also be required to assist with one or more of the following tasks:
 - Raise the alarm.
 - Call emergency services.
 - If safe, use the fire extinguisher.
 - Direct staff to save available exit routes.
 - If safe, check areas such as toilets and storerooms to ensure all are evacuating.
 - Assist disabled people.
 - Close windows & doors.
 - Ensure hazardous processes or machinery have been shut down or isolated.
 - Assist with roll call at the assembly point.
 - Report to the fire service on their arrival.

2.10 The Occupational Health and Safety Committee

The Occupational Health and Safety Committee (The Committee) has been set up and should be run on a quarterly basis. The Committee comprises the Chief Operating Officer of Group Risk, Head of People and Organization and or the Employee Relations representative, Health and Safety Manager, Head of Facilities, Operational Resilience Manager and Head of Operational Risk. The Committee is supported by the Operational Resilience Working Group (ORWG) and Health and Safety Representatives. The Committee aims to provide SAPSI with a mechanism for consulting with employees on matters of health and safety. Any issues to be escalated to the committee by the ORWG and if Board awareness is required, the matter will be escalated from the committee to the Board. Escalation points such as severe incidents and fatalities are also part of the annual sustainability report to the Social and Ethics committee.

The Occupational Health and Safety Committee's duties:

- Members meet when required, in order to initiate, promote, maintain and review measures for ensuring the health and safety of the workers; quarterly report from the Health and Safety Manager to be distributed and committee to meet only when escalations are required.
- To keep records of recommendations to employers and inspectors (3years).
- Where these recommendations do not lead to solving the matter, the committee may make recommendations to an inspector.
- Shall discuss, report and keep records of incidents in which someone is killed, injured, or infected with a communicable disease.
- To represent their team/department/office and to give them the opportunity to put forward suggestions or highlight any concerns regarding health and safety.

2.11 Health and Safety Co-Ordinator's

Day-to-day responsibilities for health and safety at SAPSI offices are carried out by Branch Health and Safety Co-Ordinator's.

Specifically, they are responsible for:

- Assisting People and Organization | Facilities Manager by carrying out the health and safety elements of new starter induction training.
- Ensuring that any visiting contractors are assessed for Health and Safety competence and that the appropriate Third-Party Health and Safety Assurance Questionnaires are completed and retained on site for future reference/audit purposes.
- Reporting any unsafe working practices.
- Regularly carrying out inspections of the premises and maintaining records to ensure that all facilities are maintained in safe working conditions, welfare facilities are monitored, and walkways kept clear at all times.
- Ensuring all accidents are recorded in the accident book and reported to the Health & Safety Manager as appropriate.

2.12 Employees

All employees irrespective of status have the following responsibilities:

- To take reasonable care for their own health and safety and to consider the safety of others who may be affected by their high-risk actions.
- To be familiar with all relevant information in the health & safety policy and any additional relevant procedures and to co-operate in the implementation of their contents.
- To report any hazards on their respective floors or at workstations to the SHE Rep of the floor.
- To co-operate with the investigation of accidents and any subsequent corrective or preventative actions.

Failure to comply with any health and safety instructions, work procedures or safety rules may



result in disciplinary action in accordance with the organization's disciplinary procedures.

3. Evacuation exercises

- All SAPSI buildings and branches must have an up-to-date Emergency Action Plan that is reviewed annually.
- All SAPSI buildings and branches will conduct an evacuation exercise to train staff and occupants, and to evaluate their efficiency and effectiveness, in carrying out emergency evacuation procedures at least annually. The Health and Safety Manager and Branch Health and Safety Co-ordinators, together with security, will plan, organize, and oversee the drills. It is advised to include local Disaster Management and Law Enforcement departments in the planning of the evacuation exercises.
- All drills and the outcome of the drill are to be recorded, and a report of outcomes tabled and discussed at the Occupational Health and Safety Committee.
- All records need to be stored for inspection by the Health and Safety Manager.

4. Reporting of incidents and fatalities

Reporting of incidents and fatalities are conducted as per legislation:

- All incidents are recorded and retained by the Health and Safety Manager.
- Incidents requiring medical intervention are recorded on workman's compensation forms and submitted to the processing hospital and the labor department. The records are retained by People and Organization as well as the Health and Safety Manager.
- Fatalities are recorded in an incident report and reported to the labor department and the police.
- The matters are discussed and noted at the quarterly Health and Safety Committee for recording and mitigate actions to prevent similar events occurring where required.
- All serious and fatal incidents are quarterly reported at the Social and Ethics Committee.

5. Review and monitoring of the policy.

- This policy will be monitored regularly to ensure that the objectives are achieved by the Health and Safety Manager.
- It will be annually reviewed and, if necessary, revised in the light of legislative or organizational changes by the Health and Safety Manager.

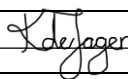
6. Policies Linked to the OHS Policy

- Operational resilience policy



Document Control

Version	Date Approved	Next Review Date	Owner	Authorised By
1.0	01 February 2025	30 January 2026	Occupational Health Officer	Chief Executive Officer

Name & Designation	Signature	Date
Chief Executive Officer		01/02/2025