



# Draft Health, Safety & Environment Policy

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## 1. STATEMENT OF COMMITMENT

At ACP and our investee companies, we are committed to ensuring the health and safety of all those who contribute to our operations, reside in the communities we operate in, or support us. Our business practices will be conducted with respect and care in all communities we serve, and we will systematically manage risks to achieve sustainable business growth. Our top priority is to eliminate injuries, occupational illnesses, unsafe practices, and environmental harm resulting from our activities. This is integral to our values and business principles.

## **2. SCOPE AND APPLICABILITY**

This policy applies to ACP and its investee companies, encompassing all activities, locations, and personnel associated with our operations. To meet our commitments, ACP will ensure that all employees and project companies understand that working safely is an integral part of our daily work activities, and that they are each responsible for their own safety and for those around them. ACP will manage all projects and processes through their life cycles in ways that protect safety, health and minimize impacts on the environment. It is therefore mandatory for all employees, contractors, and stakeholders to adhere to the principles outlined in this policy.

## **3. LEGAL AND REGULATORY COMPLIANCE**

At ACP, legal and regulatory compliance is not just a legal requirement, but a fundamental responsibility to protect employees, the environment and communities in which we operate. We pledge to comply with all applicable national and international laws, regulations, and standards related to health, safety, and the environment. By adhering to these HSE regulations and adopting a culture of continuous improvement, we can create a safer, healthier and more sustainable future. We will consistently scrutinize and update our procedures to stay abreast of changing legislative requirements.

## **4. RESPONSIBILITIES**

To accomplish our HSE goals, ACP and its investee companies will establish well-defined roles and responsibilities. Designated HSE managers and committees will supervise the implementation of HSE measures and foster a continuous improvement culture of safety.

ACP and its investee companies are committed to fulfilling its legal obligation to ensure, as far as is reasonably practicable, the health, safety, and well-being of their staff and visitors to their premises and on project sites. This commitment extends to:

- Creating workplaces that are free from hazards and risks to health
- Implementing and enforcing safe systems of work for all tasks and activities
- Ensuring the safe handling, storage, and use of all materials and substances on project sites

- Providing ACP staff and investee workers with the necessary information, instruction, training, and supervision to protect their health and safety

#### 4.1 Employees

Every individual, including employees, contractors, visitors, and third parties, bears a responsibility to actively manage workplace health and safety risks within their respective areas of influence. Each person is accountable for their own safety and the safety of others who may be affected by their actions or inaction. Employees must collaborate in implementing the Health, Safety, and Environment policy and integrating safety into all ACPs activities. This includes reporting any work situation that poses a serious or immediate danger to individuals. Managers have an additional responsibility to ensure their employees are aware of this policy.

Employees are expected to read, understand, and comply with ACP and its investees HSE policies, procedures, and related risk assessments applicable to their work. Without limitation, employees must:

- Abide by the ACP and its investees HSE policies, procedures, rules, and regulations and consistently practice safety while performing their duties.
- Report to work in a condition that allows them to perform their job duties safely and competently. Employees unable to perform their job duties safely or competently must inform their manager, manager's manager, or HR Partner.
- Immediately report any unsafe working conditions observed or experienced.
- Be vigilant for hazards while carrying out job duties and suggest safer work procedures when appropriate.
- Ensure accidents/incidents are reported to their manager immediately upon occurrence or observation.
- Follow appropriate procedures for working alone on-site visits and facilities by checking in with Site Managers, building security, and ensuring communication channels are in place.
- Adhere to site rules governing restricted access areas.
- Report any matter likely to compromise fire safety in the building and cooperate with the emergency team during emergency or drill situations.
- Maintain a safe work environment to reduce the risk of accidents.

#### 5. RISK ASSESSMENT AND MANAGEMENT

We are dedicated to proactively identifying, thoroughly evaluating, and effectively managing risks connected to our operations. We encourage employees to report hazards without delay, and we will take swift corrective actions to prevent accidents and incidents. Risk assessment and management are essential components of ACPs HSE policy and will help identify, assess,

and prioritize potential hazards, and then implement appropriate controls to minimize or eliminate risks.

## **6. TRAINING AND COMPETENCE**

ACP and its investee companies are committed to providing employees with the necessary skills and knowledge to carry out their roles in a safe manner, developing a skilled and competent workforce and promoting a culture of learning in the workplace. Ongoing training programs will be established to address emerging risks and changes in procedures. Under the Safety, Health and Welfare at Work Act, 2005 (Sections 8 and 10)<sup>1</sup> the employer is required to provide instruction, training and supervision to his/her employees in relation to safety, health and welfare at work.

In line with legislation HSE training must be provided:

- On recruitment e.g. induction.
- In the event of the transfer of an employee or change of task assigned to an employee
- On the introduction of new work equipment, new systems of work, or changes in existing work equipment or systems of work.
- On the introduction of new technology.
- To maintain employee competency.

## **7. EMERGENCY PREPAREDNESS AND RESPONSE**

We are committed to establishing and maintaining a robust emergency preparedness and response (EPR) system that encompasses regular drills, comprehensive communication plans, and a culture of proactive preparedness. This unwavering commitment ensures that we are equipped to respond swiftly and effectively to any emergency, minimizing the risk of harm to life and property, and safeguarding the environment.

Our EPR system will be anchored in a comprehensive emergency preparedness plan that outlines a detailed response strategy for a wide range of potential emergencies, including natural disasters, technological failures, and security threats. This plan will be regularly reviewed and updated to reflect changes in our operations, the surrounding environment, and evolving best practices.

Regular drills and exercises will be a cornerstone of our EPR system, ensuring that our personnel are familiar with their roles and responsibilities, possess the necessary skills to execute emergency procedures, and can coordinate effectively under pressure. These drills will simulate various emergency scenarios, providing valuable hands-on experience and opportunities for improvement.

Effective communication is paramount in any emergency response. We will establish clear and reliable communication channels to ensure that critical information is disseminated rapidly

and accurately to all stakeholders, including employees, contractors, emergency responders, and the public. This will facilitate coordinated decision-making, minimize confusion, and expedite the response effort.

A culture of proactive preparedness will permeate our organization, fostering a mindset of vigilance, risk assessment, and hazard elimination. This culture will encourage employees to identify potential hazards, report them promptly, and actively participate in emergency preparedness initiatives. By embracing this culture, we can prevent emergencies from occurring in the first place.

The cornerstone of our emergency preparedness strategy is the unwavering commitment to the safety and well-being of our employees, the protection of the environment, and the preservation of our assets. By investing in a robust EPR system, we are investing in our future, ensuring that we are equipped to handle any unforeseen event, no matter how challenging.

## **8. HEALTH AND WELL-BEING**

ACP is committed to investing in employee wellbeing as a win-win for employees and the organizations. By nurturing employee wellbeing, ACP and its investee companies can foster a positive work environment that minimizes stress and promotes thriving. Prioritizing employee health and wellbeing is a key driver of employee engagement and organizational success. Part of promoting the physical and mental well-being of its employees This involves providing health services, ergonomic considerations, and fostering a positive work environment.

ACP is committed to establishing a comprehensive framework that encompasses physical health and safety, mental health, and access to supportive resources such as counseling, an employee assistance program, and occupational health services whenever possible. ACP will prioritize ongoing guidance for managers, empowering them to engage in sensitive conversations with their teams and refer individuals to expert help when needed. All employees are encouraged to adopt a healthy approach to self-care, incorporating a balanced diet and adequate sleep into their daily routines.

## **9. ENVIRONMENTAL STEWARDSHIP**

ACP and its investee companies are committed to minimizing our environmental footprint by embracing sustainable practices, minimizing waste generation, and conserving resources judiciously. Environmental considerations will be embedded into our decision-making processes, ensuring that our operations align with a responsible and sustainable approach.

## **10. CONTINUOUS IMPROVEMENT**

We are committed to a relentless pursuit of excellence in our health, safety, and environmental (HSE) performance. We recognize that every near miss, incident, or learning opportunity represents an opportunity to identify and address potential hazards, prevent future incidents, and further enhance our overall HSE performance.

Investigations into near misses, incidents, and lessons learned will be rigorous and comprehensive, involving a thorough analysis of the root causes, contributing factors, and potential preventive measures. This systematic approach ensures that we learn from our experiences and implement effective corrective actions to prevent recurrence.

Corrective actions will not be limited to rectifying immediate issues; they will also address underlying systemic issues and promote a culture of continuous improvement. We will strive to embed HSE principles into our organization's DNA, fostering a culture of vigilance, risk assessment, and proactive hazard elimination.

Our commitment to HSE excellence extends beyond mere compliance with regulations; it is an integral part of our corporate ethos and a driving force behind our success. We believe that by prioritizing HSE, we not only safeguard the well-being of our employees but also enhance our reputation, attract top talent, and foster a sustainable business model.

## **11. COMMUNICATION**

Clear and accessible communication channels will be implemented to spread HSE information across the organization. Regular safety meetings and transparent reporting mechanisms will be sustained to foster open communication on HSE issues. Furthermore, we will ensure that management and staff are consulted when changes are made to the HSE policy. Adequate participation in team meetings with HSE issues and concerns should not be overlooked.

## **12. MONITORING AND EVALUATION**

A robust system of regular monitoring and evaluation will be established to gauge the efficacy of our HSE measures. Audits, inspections, and performance reviews will be carried out to verify compliance and pinpoint areas for improvement. To achieve this, we will establish clear goals and objectives. ACP will ensure regular data collection which will enable us to track trends and identify problems early on. The data collected will be carefully analyzed so we know the effectiveness of our HSE measures, know areas to improve on and take actions based on our findings.

## **13. DOCUMENTATION AND RECORDKEEPING**



ACP and its investee companies are mandated to maintain comprehensive health and safety records and statistics. These records, including training activities, first aid treatments, and incident investigations, serve as valuable tools for identifying and addressing potential hazards, developing effective training programs, and providing documentation in case of incidents or regulatory inquiries. Key records to maintain include.

- Consultation records: Documentation of discussions with employees on safety matters
- Program review records: Assessments of the effectiveness of health and safety programs
- Worker orientation records: Evidence that employees have received necessary training
- Inspection reports: Records of hazard identification and control measures
- Monthly meeting records: Documentation of progress on safety action items
- Incident investigation reports: Detailed analyses of incident causes and corrective actions
- First aid assessments: Evaluations of first aid requirements for the workplace
- First aid records: Statistics on injuries to inform safety priorities

Valuable statistics to track:

- Number of incidents and injuries annually
- Number of workdays lost annually due to injuries
- Financial costs associated with workplace injuries

#### **14. REVIEW AND REVISION**

This Policy shall be regularly reviewed to ensure ongoing suitability. The commitments listed are in addition to our obligation to comply with all applicable laws and regulations where we operate. This allows us to minimize all losses and adds value for all our stakeholders.

#### **15. CONSEQUENCES FOR NON-COMPLIANCE**

Failure to adhere to this HSE policy will lead to fitting consequences. We're dedicated to implementing safety regulations rigorously to establish a secure and healthy work setting. Individuals are held responsible for their conduct when working for or on behalf of ACP, and appropriate measures will be taken if their behavior is not in line with the policies, procedures, and relevant documentation. Consequences will vary depending on the situation, and they could range from a verbal warning to termination of employment.

#### **16. INTEGRATION WITH OTHER POLICIES**

This HSE policy will be integrated with other organizational policies, fostering a holistic approach to our business principles. The integration will ensure alignment with quality management, ethics, and sustainability initiatives.

## 17. EXTERNAL STAKEHOLDER ENGAGEMENT

We are committed to fostering a culture of open dialogue and collaboration with our external stakeholders, including regulatory bodies, communities, and customers, to address health, safety, and environmental (HSE) matters with transparency and shared responsibility.

We recognize that effective HSE management extends beyond our internal operations and requires active engagement with the broader ecosystem in which we operate. By maintaining open communication channels with our stakeholders, we can gather valuable insights, identify potential risks and opportunities, and collectively develop solutions that promote HSE excellence.

Our engagement with regulatory bodies will be characterized by transparency and adherence to all applicable laws and regulations. We will proactively seek feedback from regulatory authorities, participate in industry consultations, and maintain regular communication to ensure that our HSE practices are aligned with evolving regulatory standards.

We will foster strong partnerships with communities in which we operate, recognizing their unique perspectives and concerns regarding HSE matters. We will establish community engagement platforms, organize regular forums, and actively participate in community events to build trust, share information, and collaborate on HSE initiatives.

Our customers will be integral partners in our HSE journey. We will involve them in our product development processes, provide clear instructions and training on the safe use of our products, and promptly address any safety concerns they may raise. We will also work closely with our customers to promote sustainable practices and minimize our environmental impact.

By fostering a culture of transparency, collaboration, and shared responsibility with our external stakeholders, we aim to achieve the following HSE objectives:

- Enhance our understanding of HSE risks and opportunities through diverse perspectives.
- Develop and implement HSE solutions that are aligned with the needs and concerns of our stakeholders.
- Promote a culture of safety and environmental stewardship that extends beyond our organization.
- Build trust and strengthen our reputation as a responsible corporate citizen.