Registered Office Address: The Hub, Suite W105, Triq Sant Andrea, San Gwann, SGN 1612, Malta
Company Registered Number: C42626 VAT Number: MT1864-8423

Company Name: PG Global ("the Company")
Model Policy No. 01/0019
Model Policy Name: Health and Safety Policy
Date: 02 September 2020

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**Section 1: General statement of policy**

**Statement of intent**

PG-Global is committed to ensuring high stands of health and safety in all of its activities and aims to comply with all current health and safety legislation.

**This policy will:**

Set clear guidance to all staff, contractors and temporary workers who are employed to work on the Company’s behalf and any others who may be affected by their actions.

Ensure that Health and Safety issues and control arrangements are clearly stated for everyone within the Company.

Reaffirm the Company’s commitment to high standards of health, safety and welfare for all employees/contractors/temporary workers and visitors.

**Section 2: Company Policy**

Under the Occupational Health & Safety Authority Act and the General Provisions for Health and Safety at the Work Place Regulations, PG-Global places extreme importance on the health and safety of its’ own employees, contractors and temporary workers. Contractors also have a requirement under the same legislation, whereby whether as an employer, or self-employed they have a duty to action, whilst on PG-Global’s premises, or any other location whilst working as a contractor for a PG-Global client in such a way as to ensure that, as far as reasonably practicable, they do not put at risk the health and safety of themselves, or any other persons.

PG-Global requires all staff, contractors and temporary workers to follow all health and safety guidelines provided by relevant external parties whilst working off site, or when working on off-shore locations. Staff, contractors and temporary workers should be clear about the arrangements for health and safety at work for the location/site they are working from.

It is the policy of the Company to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees, and to provide such information and training as they need for this purpose.
The Company accepts its responsibility for health and safety of other persons who may be affected by the Company’s activities.

The policy should be read carefully and all personnel should be aware of and apply this policy and procedure. Managers have a duty to ensure that all employees, contractors and temporary workers have access to the health and safety procedures for their location of work and fully understand the policy’s contents and comply fully with its’ requirements.

Section 3: Responsibilities

Ultimate responsibility for Health and Safety at all PG-Global’s office locations rests with the Board of Directors, with delegation of duty to the HR department. Responsibility for Health and Safety on off shore locations rests with the designated client as identified in the induction process.

Company & Client Responsibilities

It is the duty of management to:
- Provide and maintain systems of work that are safe and without risk to health;
- Ensure safety and the absence of risks to health in connection with handling of equipment, storage and transport;
- Provide information, instruction, training and supervision;
- Maintain all places of work in a safe condition;
- Provide and maintain a safe working environment.

Employee/contractors/temporary workers’ responsibilities

All workers irrespective of role have a duty in law to act responsibly and to take reasonable care for the health and safety at work of both themselves, colleagues and visitors. This duty can be carried out by:

- Working safely and efficiently;
- Using any protective equipment provided and meeting statutory obligations;
- Adhering to the Company procedures for securing a safe workplace. Individuals will be nominated to undertake health and safety duties as required.
- Reporting incidents that have led to injury or damage;
- Using Personal Protection Equipment if requested by the Company, or Client, if applicable;
- Using workplace machinery and equipment responsibly in accordance with Health and Safety guidelines as directed.
All such incidents must be recorded and reported to the appropriate designated authority as outlined in Section 9a (employees/temporary workers) and Section 9b (Contractors) and Section 9c (Incident and Near Miss Report). Any failure to adhere to this policy and the procedures set out in it will be considered a serious disciplinary offence.

Section 4: Supervision

Adequate induction and supervision is essential to maintain health and safety conditions. Employees/temporary workers will have a Line Manager who will be responsible for induction and supervision. Contractors must identify to the relevant off shore client contact who will be responsible for induction and supervision procedures and how it will be carried out effectively. Supervisors and Line Managers must be clear about what they are expected to do and where to obtain appropriate advice and authorization.

Section 5: Risk Assessments & Method Statements

Risk assessments are central to successful health and safety management. Under the Management of Health and Safety at Work Regulations, it is the responsibility of relevant personnel to carry out suitable and sufficient written risk assessments of its’ activities and assess how any risks may affect the employees/contractors/temporary workers, or others involved within the Company’s activities.

Employees/contractors/temporary workers must co-operate with others to ensure that their work does not adversely affect the work of others. Where more than one party is working in an area, all parties must agree responsibilities in advance of the work commencing and must consult with relevant personnel when planning the work.

Prior to any work being carried out on off-site locations, employees/contractors/temporary workers should have a risk assessment carried out at the site of working by the Company or Client contact. This will define all the measures necessary to carry out the work safely and meet the Company’s and Client’s legal obligations.

Following the identification of work related risks and hazards, the Company will take preventative and protective measures for employees and temporary workers working within PG-Global’s workplaces. Contractors will have these measures undertaken by the Client when working off-shore.

It is also the policy of the Company to ensure that its business is conducted in a manner so as to reduce the risks to members of the public. The Company may require you to attend such training and/or induction programs in order to meet the aims of the Company.

If a risk assessment has identified the need for PPE (Personal Protective Equipment), then PPE will be supplied and must be used whenever required. Any other persons who may have cause to be in an area where PPE is required will be informed of the PPE requirement and instructed to use it as necessary.
The allocation of duties for health and safety matters, the identity of competent persons appointed with particular responsibilities, and the arrangements made to implement this policy are set out in this policy and in associated health and safety records. Contractors are required to inform themselves of the Health and Safety procedures when working on off-shore locations, this information will be provided by the Client.

This policy will be kept up to date, to reflect changes in the nature and size of the Company. To ensure this, the policy and its effectiveness will be reviewed annually.

Section 6: Lone Working

Managers are responsible for completing lone working risk assessments and reporting incidents in the correct manner and for ensuring that the lone worker has full knowledge of the hazards and risks to which they are being exposed. Employees/contractors/temporary workers should be informed by managers/client company representative of the lone worker devices that are available to them. The lone worker will be informed of their own responsibility towards ensuring safeguarding.

Incident Reporting

Lone workers should report any incident to their Line Manager in the first instance. The lone worker will be asked to complete an incident form. Reporting lone worker incidents is important, as it can often present an opportunity to learn or uncover a new risk.

If an employee/contractor/temporary worker has any concerns for their personal safety, they should make their immediate line manager, or client representation aware as a matter of priority.

Section 7: Emergency and Fire Evacuating Procedures

You must observe the evacuation procedures laid down in the event of a fire or any other emergency situation within your location of working. You must be aware of the location of the emergency exits, assembly points and first aid kit. All employees/contractors/temporary workers, irrespective of status, will be advised during the induction process of the emergency and fire evacuating procedures including fire alarm testing in place at all PG-Global workplaces and client off-shore locations. All workers must ensure that they are aware of the emergency and fire evacuating procedures at their place of work and be prepared to attend relevant training as required. If a fire alarm is heard, other than a test sounding, leave the building immediately, by the nearest safe exit and proceed to the nominated assembly point.
Section 8: First Aid

The Company has the qualified First Aid personnel working within their workplaces. First Aid notices giving details of First Aid contracts, nearest hospitals and other emergency services are displayed.

Contractors working at off-shore locations must ensure that they are aware of the First Aid procedures within their designated workplace.

The arrangements must be to a standard acceptable under the Health and Safety (First Aid) regulations.

Section 9: Hazard Reporting & Safety Signs

All workers i.e. PG-Global employees, temporary workers/contractors can identify safety hazards and ensure notification to the appropriate designated personnel. DO NOT assume that someone else is dealing with it.

Anyone identifying a safety hazard can attempt to clear the hazard themselves, if the remedial action required is within their level of expertise and can be carried out effectively and safely without risk of personal, or third party injury. If the hazard cannot be rectified then it must be reported to either:

- Malta
- Off shore
- finance@pg-global.com
- Designated personnel as defined in the induction process undertaken by the client and off-shore local regulations

Any signs that provide information such as warning, safety, and security instructions must be obeyed at all times. Employees/contractors/temporary workers who undertake work that may be hazardous to others must arrange for the display of appropriate warning, prohibition or mandatory requirement signs. All such signs must conform to The Health and Safety (Safety Signs and Signals) Regulations.

Section 10: Incident/Accident reporting (employees and temporary workers)

All employees/contractors/temporary workers shall make provision for the reporting of accidents and dangerous occurrences as laid down in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

In addition to the specific workplace area own incidents/accidents reporting systems, the identified worker must make arrangements through the relevant PG-Global procedure to report any incidents/accidents occurring during their work.
Section 10a – Employees/temporary workers

Accident arising out of or in connection with the work of our business which is covered by the Regulations and involves:

WHO WAS INJURED?

One of our employees, temporary workers, a trainee at work or a self-employed person working on our premises; or

Any other person who is not an employee or trainee at work, but who was either in/on premises

WHAT TYPE OF INJURY?

Injury causing incapacity for

Fatal or specified major injury or condition

Other injury

ACTION REQUIRED

We notify the Enforcing Authority

We send a written report on an approved form to the Enforcing Authority within 15 days of the accident.

We make and keep a record of the accident
Section 10b: Accident Reporting/Notification Procedure - Contractors

<table>
<thead>
<tr>
<th>Incident</th>
<th>Contact</th>
<th>Contact Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accident or illness overseas</td>
<td>Call the Dedicated Personal Accident and Travel Facility 24 Hour Medical Emergency Helpline. Ensure you email PG Global to make sure the Company is aware.</td>
<td>+44 208 763 4990 <a href="mailto:contracts@pg-global.com">contracts@pg-global.com</a></td>
</tr>
<tr>
<td>Loss or Damage</td>
<td>Initially a notification of any claims should be sent to both: <a href="mailto:claims.vela@uk.rsagroup.com">claims.vela@uk.rsagroup.com</a> <a href="mailto:contracts@pg-global.com">contracts@pg-global.com</a></td>
<td><a href="mailto:claims.vela@uk.rsagroup.com">claims.vela@uk.rsagroup.com</a> <a href="mailto:contracts@pg-global.com">contracts@pg-global.com</a></td>
</tr>
</tbody>
</table>

Notification Procedure

All claims correspondence should include:
- Claimant’s name, address and contact details
- Insurance Certificate Number (718832) and details of the accident/injury/loss/damage
- Date of incident
- Cause of loss/damage/accident/injury
- Names and addresses of any other parties involved, or responsible for the incident

Please ensure you follow all Health and Safety and Reporting procedures on site. You should always:
- Report work related accidents, ill health, incidents and near misses to the local reporting system
- Report to the relevant enforcing authority when required

If you are unsure please call PG Global on +44 208 418 7950 or email contracts@pg-global.com
10c: Incident and Near Miss Report and Guidance

**PG-GLOBAL INCIDENT AND NEAR MISS REPORT**

### Categorisation

<table>
<thead>
<tr>
<th>Fatality</th>
<th>Major Injury</th>
<th>Dangerous Occurrence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incident</td>
<td>Violence</td>
<td>RTA with Injury</td>
</tr>
<tr>
<td>Red Flag</td>
<td>Near Miss</td>
<td></td>
</tr>
</tbody>
</table>

### Persons Involved

<table>
<thead>
<tr>
<th>Is the person:</th>
<th>Employee</th>
<th>Contractor</th>
<th>Temporary worker</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Incident Number:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address of employee:</td>
<td></td>
<td>Address of Contractor:</td>
<td>Address of Temporary worker:</td>
</tr>
<tr>
<td>Address of Contractor:</td>
<td></td>
<td></td>
<td>Age:</td>
</tr>
<tr>
<td>Address of Temporary worker:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office address of PG Global:</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Consultants name if applicable</td>
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</table>

<table>
<thead>
<tr>
<th>Date of Incident:</th>
<th>Time of Incident:</th>
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<td></td>
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### Location(s) of Incident

<table>
<thead>
<tr>
<th>Location of Incident:</th>
<th>Exact Location of Incident:</th>
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<tbody>
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</table>

<table>
<thead>
<tr>
<th>Was the Incident on:</th>
<th>Other</th>
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</tbody>
</table>
**Medical Attention**

<table>
<thead>
<tr>
<th>Medical Attention Required:</th>
<th>None</th>
<th>First Aid</th>
<th>Hospital/Doctor</th>
<th>Sick Absence</th>
</tr>
</thead>
</table>

**Incident/Injury Details**

<table>
<thead>
<tr>
<th>Incident Details:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Witness Details:</td>
</tr>
<tr>
<td>Reported By:</td>
</tr>
<tr>
<td>Report Date:</td>
</tr>
</tbody>
</table>

*NB: Please provide a separate witness statement and include Incident Reference Number*

**Affected Person or Nominee**

Name: .................................................................

**Investigating Manager**

Please ensure the above incident report details are correct, please see attached guidance notes; amend if necessary in red. Please return fully completed form to PG-Global within four working days and ensure that a copy of this accident report is sent to the affected person.

Name: 

Telephone Number: 

Fax Number: 
Further guidance is contained within the guidance notes or through the PG Global Health and Safety Team at contracts@pg-global.com. Any view, opinion or intention that is recorded in respect of an individual must be able to be substantiated. It is important that a thorough investigation is carried out. This report may be used in subsequent court proceedings. See notes below for additional guidance.

<table>
<thead>
<tr>
<th>Incident Number:</th>
<th>Date of Incident:</th>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Name of affected person:</th>
<th>Other info:</th>
</tr>
</thead>
</table>

1. Please provide a description of the incident based on your enquiries taking into account weather and ground conditions. It should be factual and avoid comment. You must provide any photos that may support your evidence in section 11 below.

2. Was CCTV footage of the incident available? If so, ensure a copy of this is retained by the investigating line manager.

3. Give reference to any training, instruction or guidance relevant to the activity undertaken.

4. Please list any Health and Safety training completed by the individual and date of completion. (Please include the employee safety checklists).
5. If the activity required the use of work and/or personal protective equipment, state if it was, or was not, used/worn correctly, and whether it was of the correct type, fit and condition. You should specify the exact type of equipment including serial number, if relevant, and the most recent inspection date and proof of the inspection. Any faulty equipment should be held secure by the investigating line manager for further investigations.

6. Were there any immediate causes of the incident?

7. Were there any root causes of the incident?

8. Was remedial action required to make the situation safe? If so please give details.

9. Was further action taken to prevent a recurrence? This may include training, 1-1 briefing, ensuring risk assessments are fit for purpose, discipline review.
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<table>
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<tbody>
<tr>
<td>10. Please provide any witness statements relevant to the incident. Please attach separate sheet signed by the witnesses/s, with relevant incident number.</td>
<td></td>
</tr>
</tbody>
</table>

**Investigating Manager, please complete below:**

<table>
<thead>
<tr>
<th>Signed:</th>
<th>Print Name:</th>
<th>Dated:</th>
</tr>
</thead>
</table>
Further guidance may be obtained through the PG Global Health and Safety Team at contracts@pg-global.com. Any view, opinion or intention that is recorded in respect of an individual must be able to be substantiated. This report is to be completed to the best of your knowledge, information and belief; it may be used in evidence in subsequent Court Proceedings. An incomplete or inaccurate Investigation Report could have serious implications in the future should a Litigation case arise. It is the responsibility of the Investigating Manager to ensure that the integrity of the Investigation can be relied upon if presented as evidence. Therefore Copies of the PG Global Incident Report and the PG Global Incident Investigation Report along with any relevant information such as: training records, team meeting briefs (e.g., 1 to 1 notes, copies of maps, diagrams, witness statements and photographs) should be held in the individual’s personal file along with any other investigative material for a period of 5 years from the date of the incident.

Whilst investigating this incident, some of the people you see may express reactions to you, e.g. shock, flashbacks, depression, grief, guilt, distress etc. If a person or their reactions causes you any concern, you are advised to contact the PG Global HR department. If sick absence has occurred as a result of this incident please ensure that you report the absence immediately to the PG Global HR department.

You should consider carrying out a joint investigation with the relevant Union Safety Representative (USR).

1. Describe what happened

   This should contain a description of the incident based on your enquiries taking into account weather and ground conditions. It should be factual and avoid comment. Use sketches or photographs if it helps. Any plant, equipment or tools involved should be clearly identified by means of name, item code, identification number and records of test or inspection dates. It may be necessary to withdraw from use and impound pieces of equipment (particularly if faulty) that may have contributed to the cause of the incident. Use more paper if required and attach to the report including incident number.

2. Was CCTV footage of the incident available? If so please request this is retained by the local manager.

   Contact details of the relevant FM's can be found on the intranet

3. Give reference to any instruction or guidance covering the activity undertaken.

   Was the instruction or guidance being followed, if not please state what was not being complied with? Please contact the PG Global Safety Team for further guidance (‘none’ or ‘not applicable’ will rarely apply).

4. If the activity being carried out required the use of work and/or personal protective equipment, state if it was or was not being used/worn correctly and whether it was of the correct type, fit and condition.

   You should specify the exact type of equipment including serial number, if relevant, and the most recent inspection date and proof of the inspection. Any faulty equipment should be held secure for further investigations.
5. Were there any immediate causes of the incident?

The incident is caused directly by either the unsafe acts of persons or by exposure to unsafe physical conditions – known as the immediate causes. These unsafe acts and conditions are caused due to underlying problems – these are the root causes and can be split into poor job factors and poor personal factors. The poor personal factors and job factors are the result of inadequate management control.

The immediate causes of the incident are the unsafe acts of persons and the existence of unsafe conditions. They exist as symptoms of some underlying basic causes. The terms substandard practices and substandard conditions are generally used now as it moves away from the finger-pointing stigma of an unsafe act and thus blaming an individual and also it relates to practices and conditions to a standard and you can measure against a standard.

You should look at these substandard practices and conditions as being symptoms and ask “why did these practices or conditions occur?”

7. Were there any root causes of the incident?

The root causes are the real causes behind the symptoms – these are the factors that when identified show where PG Global can exercise meaningful control to prevent the incident and other similar types of incidents from happening again. For example a person is unlikely to follow a proper procedure if they have never been properly trained. Also equipment may become defective over time if there is not adequate planned maintenance.

It is rare for an incident to arise from a single cause – usually a combination of factors that create the substandard practice or the substandard condition. To understand why incidents happen you must find the basic causes of the substandard practice or conditions and deal with them.

Whilst you should try to identify every possible cause of a problem, you must focus on those causes with the greatest potential to cause a loss and the greatest probability of recurrence. For Example: instead of arriving on a defective ladder at the simple conclusion “remove the ladder” you should ask:

- Why was the defect not observed during normal inspection?
- Is there a procedure for routine inspection?
- Why did the supervisor/manager allow its use?
- Did the employee know it should not be used?
- Was the employee properly trained?
- Why was the defective ladder available for use?

Corrective action may then include: improving inspection procedures, improving training, defining responsibilities, planning the job properly.
8. **Was remedial action required to make the situation safe?**

   *If there is a continuing hazard at the location where the incident took place there may be a need to secure the area and or stop the activity, or remove the hazard (faulty chair, furniture etc.).*

9. **What further action has been taken?**

   *Consider reviewing Safety Instructions, Risk Assessments, Local Instructions etc, hold a team briefing, complete additional training, and complete Safety checks. The company has a legal responsibility to ensure that the safety procedures are followed.*

10. **Please provide any witness statements relevant to the incident. Please attach separate sheet signed by the witnesses/s, with relevant incident number.**

    *It is important to provide concise witness statements where available. Statements should be factual and avoid comment. If photographs are available they should also be provided.*

    *The investigating line manager must send a covering e-mail plus the completed incident investigation report to PG Global within 4 working days at the address supplied when the forms were sent to you.*

11. **Supporting evidence. Please provide boxes to insert photographs**

    *Insert any supporting photographs into the boxes provided.*
Section 11 - Smoking

All PG-Global sites are non-smoking areas. Smoking is only allowed in designated smoking areas external to those buildings. Smokers of e-cigarettes must also follow these rules. (*Please note there is a separate Smoking in the Workplace Policy available from contracts@pg-global.com for further information*).

Contractors please refer to local off shore workplace guidance as directed by the client contact upon induction.

Section 12 - Hygiene

PG-Global requires all employees/contractors/temporary workers to maintain good personal hygiene when working for the Company, or on behalf of the Company and adopt an appropriate, safe and hygienic dress code. Toilets and washrooms should be kept in a clean and hygienic state after use. We expect all employees/contractors/temporary workers to take all reasonable steps to protect themselves from acquiring infections. (*Please note there is a separate Prevention and Control of Infectious Diseases Policy available on PG-Global’s website – www.pg-global.com for further information*).

Section 13 - Appropriate Behavior

Behaviors such as using offensive, or inappropriate language, provocative gestures, drunkenness, illegal drug taking, gambling, threatening or violent behaviors or horseplay are not acceptable and can cause stress to those sharing the work site. (*Please note there is a separate Alcohol and Drugs in the Workplace Policy available on PG-Global’s website – www.pg-global.com for further information*).

PG-Global does not wish its’ employees/contractors/temporary workers, or its’ clients exposed to such behaviors and in the unlikely event of such behaviors taking place, the Company will reserve the right to terminate their association with that person.
Section 13 - Refuse and Site Tidiness

Refuse must not be allowed to accumulate. All employees/contractors/temporary workers are expected to keep their work areas clean and tidy. Aisles, passageways, fire exits and escape corridors and all routes to and from firefighting equipment must be kept clear at all times.