

HEALTH AND SAFETY POLICY

I. POLICY STATEMENT

It is the policy of Orotrade DMCC (the “**Company**”) to ensure, so far as it is reasonably practical, the health, safety and welfare at work of all its employees, contractors and visitors, in accordance with the relevant statutory requirements and corporate best practice. The Company also accept its responsibility for the health and safety of other people who may be affected by its activities. Consideration is given to ensure suppliers and contractors’ provision for safety is compatible with that of the Company. It is the Company’s belief that essentially all hazardous events are preventable, and that the most effective prevention of injury is the awareness and commitment of employees at every level. In particular, the Company shall:

- Provide and maintain equipment and places of work that are safe and without risk to health.
- Provide as necessary, information, instruction, training and supervision that is required to ensure health and safety at work of its employees.
- Encourage staff to set high standard of safety and to foster an attitude of mind which accepts good safety practice as normal.

In pursuance of this policy the Company has appointed a Safety Officer to advise the organization on all matters relating to health, safety and welfare, and to oversee its implementation.

The objective of this health & safety statement can only be achieved through the support and cooperation of all staff. It is therefore the responsibility of all employees, to ensure that by their activities or behaviour, they do not knowingly create hazards for themselves or others.

To ensure this policy, and the way in which it operates, is kept up to date, it will be subject to an annual review.

II. GUIDELINES

1. Competent Advice

It shall be the Company’s policy to utilize the services of both in-house expertise and external health and safety support, as appropriate. The Company shall determine competency as a person or group with sufficient knowledge, training and experience in health and safety matters relating to the Company’s undertakings.

2. Information and Records

Information relating to health and safety matters shall be obtained through a variety of mediums including official websites, external advisors and professional bodies. A central file of such information will be maintained, being the responsibility of the Health & Safety Officer. The Health & Safety Officer shall determine the means of dissemination and mode of communication for relevant information (taking into consideration any potential impairments such as eyesight, hearing and language differences). General update information shall be provided through the Company's Intranet. It shall be the Company's policy not to rely solely on poster campaigns or signage as a means of communicating information. Records referenced throughout this policy, shall be retained in line with Company Procedures and in accordance with data protection legislation.

3. Induction and Training

It is the Company's policy that all employees receive formal Induction Training as near to the first day of employment as practical. Line management (persons employing or responsible for supervision of the new starter) will be responsible for ensuring the requirements of this arrangement are completed in regard to both health and safety and occupational health attributes.

4. Consultation and Communication

The Company will consult with employees through the appointed Safety Officer. The Safety Officer (or Local Representative) shall ensure that Health & Safety meetings are convened when necessary or when requested. Other meeting may also be utilized for this purpose. Consultation and communication with staff shall be maintained to the highest practical extent, utilizing the methodologies prescribed within the corporate Management Systems. This shall also include arrangements for employees, contractors and visitors who cannot easily communicate in the principal language at the place of work. Communication chains shall generally follow the Company's hierarchy. The Company shall ensure that where visually or hearing impaired persons are employed that effective means of communication are provided. Those employing such persons will be responsible for ensuring the requirements of this arrangement are followed. All employees are required to contribute to the consultation process and communicate effectively through the available communication chains.

5. Supervision and Inspection

It is Company policy to determine adequate supervision levels through activity specific risk assessment, taking into consideration such factors as difficulty of tasks, risks involved, operative experience, client requirements, etc. Where contractors are engaged, they will be required to provide their own supervision regardless of the Company's provision. The Safety Officer shall ensure that the Company's offices and regular places of work are periodically inspected. Reports of inspections are to be evaluated by the Safety Officer and Office Manager relevant to the location with any remedial actions being determined. The Safety

Officer will monitor the remedial action requirements of each inspection to assist with identification of trends.

6. Monitoring, Measurement and Review

The requirements and performance of this policy shall be monitored through a range of mediums, including inspections, audits and safety tours, where key activities and operations are evaluated. The Safety Officer (or Local Representative) shall be responsible for ensuring this arrangement is followed. The Company shall endeavor not to rely on accident, ill health and incident statistics as a measurement of performance, though these shall be evaluated. Line management are responsible for ensuring the relevant information is collected and passed to the Safety Officer, who shall ensure statistics are analyzed. The CEO shall measure performance in relation to set aims and objectives on an annual basis. It shall be Company policy to undertake internal audits to ensure on-going compliance with the Management System and these audits will also be used to monitor Health, Safety and Security operational controls. The CEO shall review policy and performance on an annual basis, having access to the findings of the above processes.

7. Drugs and Alcohol

The Company forbids the use of illegal drugs.

The Company supports a policy of responsible consumption of alcohol, on appropriate occasions. Staff are reminded that alcohol, on average takes one hour per unit to be processed and therefore care must be taken to ensure that they are not still under the influence of alcohol (especially if driving) should they drink the previous evening. It will be the individual's responsibility to notify their line manager when taking prescriptive drugs that may affect their performance or cognitive ability putting others and themselves at risk especially when carrying out complex / articulate tasks or driving a car.

8. Disputes

In the event of a dispute regarding health and safety matters, it should be reported to a director for addressing, and if not successfully resolved, directed to the Safety Officer or CEO in writing.

9. Discipline

Failure to comply with the Company's Health & Safety Policy or contravention of statutory requirements, regulations or rules, may result in disciplinary action been taken, including (for serious cases) termination of employment for cause.

10. Contractor and Agency Selection and Control

The Company shall maintain a database of preferred contractors, of whose health and safety performance is already ascertained and is broadly compatible with the Company's own standards. Contractors may be subject to competency checks prior to appointment, as deemed necessary by the Safety Officer. Contractor performance shall be monitored via internal supervision and where necessary ad-hoc health and safety checks undertaken.

11. Risk Assessment, Safe System of Work and Control Hierarchy

It shall be Company policy to assess all aspects of its operations to determine significant risks. All significant risks shall be recorded and communicated to those who may be exposed to them.

Risk assessments shall be reviewed regularly to ensure that they remain suitable and sufficient with any changes being communicated to those affected.

The Safety Officer shall ensure that activity specific risk assessments are maintained and controlled.

Businesses contracted by the Company shall be expected to provide their own assessments, where appropriate.

The risk assessment process shall be used to identify adequate measures to control that risk and to develop a safe system of work that shall follow the expected hierarchy of:

- Avoiding risks
- Combating risks at source
- Adapting the work to the individual
- Adapting to technical progress
- Substitution of the dangerous for the less dangerous
- Giving collective protective measures priority over individual protection measures
- Giving appropriate instruction, information and training to employees

With particular reference to young persons and pregnant women, it is the Company's policy to take specific account of the vulnerability of these groups and to make assessment of the potential impact upon them to determine adequate controls. All Directors are responsible for ensuring risk assessments are undertaken as applicable for matters under their direct control. They shall also be responsible for ensuring that safe systems of work are implemented.

12. Control of Substances Hazardous to Health

No substances that fall into this category shall be used unless an assessment has been made and control measures identified, taking into account the substance format, issues affecting the substance, the environment, purpose of use, routes of exposure, people involved, waste control, hazards arising and emergency actions. All aspects of handling, using, storing and transporting shall be considered.

Information about such substances shall be obtained from the manufacturer or supplier Material Handling Safety Data Sheets (MHSDS), not Product Information Sheets, to enable assessment to be undertaken. Those ordering materials shall be responsible for obtaining the MHSDS and for passing it to the relevant person(s) as appropriate.

The findings of the assessment, control measures and necessary precautions (and any emergency procedures) will be made clear to all affected persons prior to use.

The Company's policy and hierarchy of controls shall be followed:

- Avoid use of hazardous substances wherever possible.
- Where the use of a hazardous substance is not avoidable, selection process is to be carried out to remove the most hazardous substances and reduce the effects of their use.
- Protection through design of work processes, isolation of contact and engineering controls and use of work equipment.
- Control of exposure at source, including adequate ventilation systems.
- Use of suitable personal protective equipment (PPE)
- Use of additional training to allow for the full control of the application or use via discipline and experience.

13. Company Vehicles and Personal Vehicles used for Company Business

Vehicles shall be driven with due care and attention at all times. Drivers of vehicles are responsible for ensuring that they are maintained in a road-worthy and safe condition and that any defects are reported and rectified in a timely manner.

Where the office has implemented a Vehicle Policy, this must be adhered to. Driving licences must be submitted to HR upon commencement of the use of a vehicle then annually thereafter, or sooner if requested.

All drivers to submit to regular eye/vision tests in accordance with legislation or contractual requirements, all results to be made available to HR for retention.

The use of hand-held phones while driving is prohibited. They can only be used when safely parked, whether the medium is speech, text or any other form of data transfer. Hands free mobile conversations should only take place when traffic conditions make it safe to do so. If it is not safe, calls should be ignored or terminated. It is preferable for calls to be taken by the answer phone function and replied to when the driver has reached their destination.

Drivers are strongly recommended that operating satellite navigation devices is best undertaken when stationary. Common sense and due care should be used not to blindly follow misleading or inaccurate navigational instructions.

14. First Aid

The Safety Officer (or Local Representative) shall ensure that a qualified person and a fully maintained first aid box of suitable size and quality is available within the office at all times. The designated person shall be

responsible for the maintenance of the first aid equipment including all reserve stocks. Notices will be displayed to identify the first aid contact and equipment location.

15. Welfare

The Safety Officer (or Local Representative) shall ensure that suitable and sufficient welfare facilities are provided. Arrangement shall be made for the facilities to be regularly cleaned and maintained.

16. Fire Safety

The Safety Officer (or Local Representative) shall ensure that a Fire Risk Assessment has been undertaken in respect of all the premises where staff will be working. The validity of each Fire Risk Assessment shall be reviewed annually or in light of any changes in legislation, employee numbers, or other factors that may affect the suitability of the assessment. It is Company policy that smoking is strictly prohibited in all places of work, including vehicles.

17. Emergency Procedures

Where it has been determined that additional hazards exist (other than the fire), such as bomb threat, flooding etc., Emergency Procedures and Response Plans shall be available. The Plans will be an integral part of the Business Continuity Arrangements. Emergency Procedures shall be appropriate to the Office and its location and may be initiated utilizing the methodology prescribed within the Operating Procedures available from Facilities.

18. Incident Reporting and Investigation

It shall be Company policy to insist that all incidents requiring first aid treatment and lost-time are regarded as a near-miss incident. All employees are responsible for reporting incidents to their line manager, and line managers for reporting on to the Safety Officer.

All reportable incidents must be communicated to the Safety Officer, who shall ensure that a report is submitted to the relevant authorities.

Where reportable incidents occur to employees working away from one of the Company's offices, they shall be required to report to the Safety Officer, who shall where necessary, forward a copy of the report to the relevant authorities.

Incident statistics shall be collected, collated and passed to the Safety Officer (or Local Representative) to be evaluated. Accident Books shall be kept by the Safety Officer (or Local Representative). Where an entry is made in the accident book, those making the entry shall return the data immediately to the Safety Officer.

It shall be Company policy to investigate all reportable incidents. All reportable incidents shall be investigated internally through the Safety Officer. External consultants may be requested to assist in

investigation of any major reportable incidents. The Directors shall be responsible for ensuring this arrangement is adhered to.

19. Personal Protective Equipment

It shall be Company policy not to rely on the use of Personal Protective Equipment, but to make assessment of the task and determine more effective controls.

Where it is deemed that PPE is necessary, it shall be considered for ergonomic design (such as size, shape, practicality and with understanding to its limitations or restrictions (loss of ability to easily communicate, loss of mobility, heat gain, replacement availability, etc.) and shall be assessed for the relevant BS or EN standard applicable to the task.

The Company shall ensure that, where appropriate, staff are trained in the use, storage, handling and maintenance of PPE.

20. Asbestos

The Company CEO shall ensure that an asbestos survey has been undertaken in respect of all premises and that a management programme is in place for any Asbestos Containing Materials identified. No work will take place to the fabric of the premises unless these documents have been evaluated in the first instance. It is Company policy to ensure those evaluating tenders have considered asbestos issues in all maintenance contracts and projects at planning stage and/or when preparing health and safety plans or assessments. The Company shall only employ the services of specialist contractors (as determined by those managing the project).

21. Manual Handling Operations

It is Company policy to avoid manual handling where practicably possible through use of mechanical lifting aids or alternative assistance. Where manual handling shall be experienced the operation must be controlled to limit exposure. Where deemed necessary by the Safety Officer, a risk assessment shall be undertaken with consideration given to the task, the individual, the environment and the load. Staff will be provided with relevant training and instruction.

22. Stress Management

It shall be Company policy to determine working methods that avoid excessive exposure to stress. Managers and Directors shall be assisted to recognise signs of stress and monitor related staff absence and behaviour. Individuals are encouraged to report symptoms of stress to their line manager. All reports are treated with strict confidentiality. Any employees identified with work related stress will be fully supported by the Company, who will consider measures to help resolve issues, and where necessary seeking advice from

occupational health professionals. The Directors shall be responsible for ensuring that the stress management procedures are enforced within their operational spheres.

23. Display Screen Equipment

It is Company policy to evaluate and assess the risk from all display screen equipment use. Habitual users shall be determined and offered eye tests, providing standard eye glasses where prescribed. The Safety Officer (or Local Representative) shall ensure assessments (and reviews) are undertaken and for informing users of their entitlements.

24. Health Surveillance

With the exception of eye tests, it shall be Company policy to control activities to a level whereby health surveillances are not necessary. However, should the situation changes, the Company will consult with a medical practitioner or occupational health professionals.

25. Work at Height

It shall be Company policy to plan work at height activities, ensuring those involved are trained and competent. Emphasis shall be given to avoidance of working at height wherever practicable. It is however recognized that this is not always possible and therefore a hierarchy of control measures shall be followed. In practice, and wherever possible, any working at height shall be undertaken by competent contractors.

Wherever practicable it shall be Company policy not to allow lone working where any work at height activities are necessary and to ensure the provision of adequate supervision. All Directors will be responsible for ensuring that the above policy is followed.

26. Work Equipment

Only those with relevant training / competency shall be permitted to operate work equipment, though this policy shall not prevent equipment use for training purposes when under the supervision of a competent person. All Directors shall ensure this policy is adhered to. Equipment use shall be suitable for the task and regularly inspected (including before use) as outlined in any risk assessment and inspection by the user. All equipment noted to be defective will be removed from use until repaired, replaced or destroyed as applicable. The person responsible for identification of the defective equipment shall be responsible for ensuring policy is followed.

Where work equipment is found to be defective, the Company operates a 'do not proceed' policy. It is Company policy to ensure all equipment is maintained, inspected and tested as applicable. The Office Manager / Facilities Managers shall be responsible. All equipment users / operators shall use equipment according to instructions provided and training received, and as designed for purpose without adaption.

27. Lone Working

It is Company policy to restrict lone working to the absolute minimum. Staff who find themselves working alone on more than a few isolated occasions must contact the Safety Officer (or Local Representative) who shall ensure a risk assessment is undertaken. The Company shall ensure that employees, who have no option but to undertake lone working, are provided with instruction in the requirements of the risk assessment. The Safety Officer will be responsible for ensuring that Security Policies, where available, are fully implemented.

28. Housekeeping

The Company shall enforce a policy of high standards of housekeeping in all its offices and at all places of work. This shall be the responsibility of all Directors. A clear desk policy shall be implemented to the greatest practical extent. It is Company policy not to have food or unnecessary clothing stored under desks. Contractors working at Company's premises are required to strictly adhere to these policies and standards.