



Group Safety, Environmental & Incident Reporting Policy

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SAFETY STATEMENT

1) INTRODUCTION

Imperial Holdings is implementing safety conditions which ensure the physical well being of its employees in all divisions: no work accident should be considered as unavoidable or acceptable.

The determination to achieve this goal applies also to employees of the sub-contractors who work on the various sites served by Imperial Holdings and its divisions.

The various business units of the Groups divisions don't face the same risks and practical difficulties; consequently it is essential for each business unit to equip itself with:

- Adequate instruments for performance and progress measurement and benchmarking.
- A structure for leading, piloting and diffusing best practices.

Our aim is to introduce safety measures which are appropriate, enforceable, consistent, and which comply with legislation. Exchanges, sharing experiences and expertise will be greatly supported by local networking of safety leaders.

2) PRINCIPLES

2.1 Ensuring safety is local management's responsibility. Imperial Holdings management takes great care to ensure that local management has the authority, skills and resources to exercise its responsibility.

2.2 Every manager and employee at every level, takes safety into consideration, and ensures that it is properly monitored, on a par with other performance indicators: productivity, quality, environment etc.

- 2.3 For better elimination of risks, safety must be taken into account at the initial stages in the organization of the work itself, according to each business specificities.
- 2.4 Appropriate initiatives should also be carried out on a regular basis, at the instigation of local management at the site level. This is necessary, if a spirit of safety is to be developed and maintained, so ensuring that every employee is best protected from the hazards which can be a threat to personal and collective safety. These actions relate to information, analysis, audits and with a particular emphasis, to training.
- 2.5 If an accident does occur, even if its consequences are not serious, it must be considered as the expression of inappropriate organization or behavior. Analysis must be undertaken, and things corrected as quickly as possible, to ensure that there is no recurrence.

In the event of a fatal accident or an accident having caused permanent disability, the site management has to complete a report on its causes and measures to be taken to avoid recurrence, to be followed up at the branch' s top level.

- 2.6 Every site is subject to a yearly safety plan.

Audits and situation analysis are regularly implemented, especially on sites where frequency of accidents is high.

Whenever Imperial Holdings acquires a new operation, an audit on safety must be carried out, in order to detect hazardous situations and correct them forthwith.

- 2.7 Regular monitoring of policy implementation and measurement of results are carried out both by the local management and at the branch level.

GROUP SAFETY AND ENVIRONMENTAL INCIDENT REPORTING POLICY

It should be noted that the recording and reporting obligations of Divisions in terms of this policy do not replace any obligations in terms of specific legislation governing the operations of each division and divisions must ensure that they continue to comply with all applicable legislation.

Definitions:

Commuting accident: An accident occurring on the direct way between the place of work and:

- (a) the employee' s principal or secondary residence;
- (b) the place where the worker usually takes his/her meals; or
- (c) the place where the worker usually receives his/her remuneration,

which results in death or personal injury involving loss of working time. Traffic accidents in which workers are involved during working hours and which occur in the course of paid work are considered as occupational accidents, not commuting accidents.

Dangerous occurrence: Readily identifiable event as defined under national laws and regulations, with potential to cause an injury or disease to persons at work or the public.

Responsible director: A member of the Imperial Holdings board to whom the responsibility for group Safety Health and Environmental issues has been assigned.

Environmental incident: An incident having an impact on the environment including significant spills of Chemicals, oils and fuels and the total number of spills and total volume of spills.

Fatal occupational injury: Occupational injury leading to death. This includes all employees, 3rd parties, contractors, subcontractors or any other party where assets (premises or vehicles) of Imperial were involved.

Incapacity for work: Inability to perform normal duties of work.

Incident: An unsafe occurrence arising out of or in the course of work where no personal injury is caused (i.e. the occurrence must have no Human Impact, there must be no fatal or non-fatal occupational injuries amongst the impacts of the event), or where personal injury requires only first-aid treatment. This includes ALL environmental impacts, irrespective of the cost; and all events where fire was involved, irrespective of the cost.

Incidents (Major): An unsafe occurrence arising out of or in the course of work where damage to property exceeds R50 000 (Imperial Logistics SA only), R25 000 (All other Divisions), and there were **NO** fatal or non-fatal occupational injuries to either employees or third-parties.

Incidents (Minor): An unsafe occurrence arising out of or in the course of work where damage to property does not exceed R50 000 (Imperial Logistics SA only), R25 000 (All other Divisions), and there were **NO** fatal or non-fatal occupational injuries to either employees or third-parties.

Loss of working time: Lost days counted from and including the day following the day of the accident, measured in calendar days, weekdays, work shifts or working days. Calendar days are preferable as a measure of accident severity, while working days are preferable as a measure of economic impact. Where working days or weekdays are used, an estimate in terms of calendar days should be provided wherever possible.

Non-fatal occupational injury: Occupational injury not leading to death, AND with loss of working time.

- (a) Lost days are counted from and including the day following the day of the event, measured in working days.

Occupational accident: An occurrence arising out of or in the course of work which results in:

- (a) fatal occupational injury;
- (b) non-fatal occupational injury.

Occupational disease: A disease contracted as a result of an exposure to risk factors arising from work activity.

Occupational injury: Death, any personal injury or disease resulting from an occupational accident.

RECORDING DUTIES OF DIVISIONS

Each division should set up systems, in accordance with national laws or regulations, to record occupational accidents, occupational diseases, commuting accidents, dangerous occurrences and incidents.

These systems should include:

(a) the identification of a competent person to prepare and keep records of all occupational accidents, occupational diseases, commuting accidents, dangerous occurrences and incidents, as required by national laws and regulations; and

(b) co-operation in recording procedures where two or more employers engage in activities simultaneously at one worksite, as required by national laws and regulations.

The division should ensure that records of occupational accidents, occupational diseases, commuting accidents, dangerous occurrences and incidents are available and readily retrievable at all reasonable times.

In cases in which more than one worker is injured in a single occupational accident, a record should be made for each of the injured workers.

Workers' compensation insurance reports and accident reports to be submitted for notification are acceptable as records if they contain all the facts required for recording or are supplemented in an appropriate manner.

Records should be prepared within no more than six days after the accident, incident or dangerous occurrence.

Employees, in the course of performing their work, should cooperate with the divisional management in carrying out the arrangements for recording and notification of occupational accidents, occupational diseases and dangerous occurrences.

Appropriate information should be made available to employees and their representatives concerning:

(a) the arrangements for recording; and

(b) the competent person identified by the employer to receive and record information on occupational accidents, occupational diseases, commuting accidents, dangerous occurrences and incidents.

The division should provide appropriate information to employees or their representatives on all occupational accidents, occupational diseases, dangerous occurrences and incidents in the division, as well as commuting accidents, to assist employees and management to reduce the risk of exposure to similar events.

Minimum information

With a view to meeting the requirements of the group, labour inspectorates, insurance institutions and statistics-producing bodies, at least the following information should be recorded:

In respect of each accident:

1. enterprise, establishment and employer:

1.1 name and address of the employer, and his or her telephone and fax numbers (if available);

1.2 economic activity of the establishment.

2. injured person:

- 2.1 name, address, sex and age;
- 2.2 employment status;
- 2.3 occupation;

3. injury:

- 3.1 fatal accident;
- 3.2 non-fatal accident;
- 3.3 nature of the injury (e.g. fracture, etc.);
- 3.4 location of the injury (e.g. leg, etc.);

4. accident and its sequence:

- 4.1 geographical location of the place of the accident (usual workplace, another
- 4.2 workplace within the establishment or outside the establishment);
- 4.3 date and time;
- 4.4 action leading to injury – type of accident (e.g. fall, etc.);
- 4.5 agency related to the accident (e.g. ladder, etc.).

5. Commuting accidents

In respect of each division:

Total number of victims of:

- 5.1 accidents resulting in death, divided into deaths which occurred within 30 days of the accident, and those which occurred between 31 and 365 days of the accident;
- 5.2 non-fatal accidents, divided into the following categories: no lost time or absence from work (as specified under the national definition); or lost time (excluding the day of the accident) of up to three days and more than three days;
- 5.3 Total days lost for non-fatal injuries, divided into lost time of up to three days and more than three days.

NOTIFICATION OF OCCUPATIONAL ACCIDENTS TO AUTHORITIES

All occupational accidents should be notified, as required by national laws or regulations, to the competent authority, the labour inspectorate, the appropriate insurance institution or any other body as follows:

- (a) immediately after reporting of an occupational accident causing loss of life;
- (b) within a prescribed time for other occupational accidents;

Notification should be made within such time as may be specified, and in prescribed specific forms, such as:

- (a) an accident report for the labour inspectorate;
- (b) a compensation report for the insurance institution;
- (c) a report for the statistics-producing body; or
- (d) a single form which contains all essential data for all bodies.

NOTIFICATION OF DANGEROUS OCCURRENCES TO AUTHORITIES

National laws or regulations usually regulate the notification of dangerous occurrences arising in connection with work activities, and which is required to be notified to the competent authorities, include at least the following information:

- (a) Enterprise, establishment and employer:
 - (i) name and address of the employer, and his or her telephone and fax numbers (if available);
 - (ii) name and address of the enterprise;
 - (iii) name and address of the establishment (if different);
 - (iv) economic activity of the establishment;¹ and
 - (v) number of workers (size of the establishment);
- (b) Dangerous occurrence:
 - (i) date, time and location;
 - (ii) type of dangerous occurrence;
 - (iii) circumstances leading up to the dangerous occurrence.

INVESTIGATION

- 1 A division should:
 - investigate all reported occupational accidents, occupational diseases, dangerous occurrences and incidents.
 - ensure that a competent person, as specified by the competent authority, is identified within the enterprise to carry out thorough investigations of occupational accidents, occupational diseases and dangerous occurrences.
- 2 Where the division lacks the necessary expertise within the enterprise to carry out a thorough investigation, it should call upon the assistance of a person with appropriate expertise, if necessary from outside the enterprise.
- 3 Divisions should, where possible, arrange for the site of an occupational accident or a dangerous occurrence to be left undisturbed before the start of the investigation, apart from the requirements for first aid or to prevent further risk to persons.
- 4 Where for reasons of first aid, or to prevent further risk to persons, it is necessary to disturb the site before the start of the investigation, the division should arrange for a competent person to make a record of the site, including where necessary photographs, drawings and the identities of eyewitnesses prior to any intervention.
- 5 Divisions should:
 - 5.1 ensure that the investigations of occupational accidents, occupational diseases and dangerous occurrences should, as far as possible:
 - establish what happened;
 - determine the causes of what happened; and
 - identify measures necessary to prevent a recurrence.
 - 5.2 ensure that arrangements are in place at the enterprise for an immediate investigation of reported occupational accidents, occupational diseases, dangerous occurrences and incidents.

- 5.3 ensure that any report required is sent to the competent authority by the quickest practicable means.
- 5.4 make the results of investigations available to workers and their representatives with a view to preventing similar occurrences and so that they may assist the employer in the more effective implementation of his or her policy on occupational safety and health.

GROUP REPORTING

Fatality Reports

All occupational accidents causing loss of life should immediately be notified to the Exco member responsible for the division in which the fatality occurred (or his appointee) in the format of Annexure A, who must in turn forward a copy of the report to the Responsible Director;

Monthly Reports

All occupational accidents, occupational diseases, commuting accidents, dangerous occurrences and incidents should be reported on a monthly basis to the Exco member responsible for the division in which the fatality occurred (or his appointee) in the format of Annexure B, who must in turn forward a copy of the report to the Responsible Director by no later than the 5th working day of the month following the month covered by the report.

ANNEXURE A

FATALITY REPORT

Report number:..... of 2013

To:

cc: Divisional CEO

cc: Rohan Venter rventer@ih.co.za

(To be submitted within 24h in respect of each accident resulting in one or more fatalities)

OPERATING DIVISION:	
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OPERATING COMPANY:	
Employee detail	
Name:	
Sex:	
Age:	
Occupation:	
Employment status:	
Third party detail	
Name/s (If available):	
Injury	
Nature of the injury (e.g. fracture):	
Location of the injury (e.g. leg, etc.):	
Accident and its sequence	
Date:	
Time:	
Geographical location of the accident (where did it happen):	
Brief description of the accident:	
Has an investigation been done?	
What immediate actions have to be taken/were taken as a result of the fatality?	

Will additional training be required as a result of the fatality (to implement lessons learnt)?	
Other comments:	

Sign-off: MD

Sign-off: CEO

ANNEXURE B

MONTHLY ACCIDENT AND ENVIRONMENTAL INCIDENT REPORT

To: R Sharfuddin

E mail: rsharfuddin@ih.co.za

Report Due: 5th of each month

Report fordivision for the month ended (day) of (month) (year)

	Month	YTD Total
Road related accidents and incidents		
• Number of road accidents		
• Number of road incidents		
• Number of injuries (employees only)		
• Number of fatalities (employees only)		
• Number of fatalities • (3 rd party only)		
• Kilometers traveled by fleet		
Other accidents and incidents		
• Number of non-road Accidents		
• Number of non-road-Incidents		
• Number of injuries (employees only)		
• Number of fatalities (employees only)		
• Number of commuting accidents		
Total number of victims of accidents resulting in death divided into:		
• deaths which occurred within 30 days of the accident:		
	Month	YTD Total
• deaths which occurred between 31 and 365 days of the accident:		
non-fatal accidents, divided into the following categories:		

<ul style="list-style-type: none"> no lost time or absence from work (as specified under the national definition): 		
<ul style="list-style-type: none"> or lost time (excluding the day of the accident) of up to three days and more than three days: 		
Total days lost for non-fatal injuries:		
<ul style="list-style-type: none"> lost time of up to three days 		
<ul style="list-style-type: none"> lost time of more than three days 		
Number of environmental incidents		
Total volume in Liters of spillages of:		
Chemicals		
Oil		
Fuel		
Other		

ANNEXURE C

REQUIREMENTS FOR THE MONTHLY SAFETY REPORT TO BE FULLY COMPLETED ON ISMS

This diagram shows the full process flow available in the EHS Management module:



In order for the monthly Safety Report to be generated on ISMS the following is required:

STEP 1: CAPTURE THE EVENT



Remember that all events are captured against a site. Capture all events as close to real time as possible.

The fields indicated by the red arrows in the screenshot below are required as the minimum initial input.

The screenshot shows the 'EVENT > NOTIFICATION > EVENTS' page in the IMPERIAL system. The main form contains the following sections and fields:

- Event Identification:**
 - Event Title: A text input field with a red arrow pointing to it and a callout box stating: "Suggested format: Company Name-further detail as per company requirements".
 - Type: A dropdown menu set to "Accident".
 - Event Date: A date and time picker set to "22 / 8 / 2012 at 10 : 15". A red arrow points to it with a callout box: "Date & time when event happened".
 - Reported Date: A date and time picker set to "22 / 8 / 2012 at 10 : 15". A red arrow points to it with a callout box: "Date & time when event is logged onto system".
- Event Details:**
 - Classification: A dropdown menu with a red arrow pointing to it and a callout box: "Drill down to correct option by clicking on icon".
 - Severity: Radio buttons for "Minor" and "Major". A red arrow points to the "Major" option with a callout box: "Pick correct option as per definitions based on value of damage".
 - Business Unit Notification, External Agency Notification, and High Learning Value Event: Checkboxes.
- Event Location:**
 - Departments, Location, and Specific Area: Text input fields.
- Report Originator:**
 - Reported by: Text input field.
- Event Description:**
 - Report: A rich text editor area with a red arrow pointing to it and a callout box: "Short description of what happened".
- Good Practices:**
 - Good Practice: Text input field.
- Initial Investigation Results:**
 - Comments: Text area.
 - Outside Factors: Text area.

At the bottom of the page, there is a status bar with the text "Saving will start a new Audit Trail" and a row of buttons: "Create", "Create & New", "Submit", "Cancel", "Send Manual Alert", and "Receive an Alert whenever Edited".

STEP 2: CAPTURE ALL IMPACTS RELATING TO A SPECIFIC EVENT



- Impacts are all the consequences of the event.
- Fully complete all applicable impacts as soon as possible.
- It is important to note that any event must have 1 or more related impacts.
- Possible impacts:
 - Environment – to be used where there were any environmental spillages/contaminations
 - Goods In Transit – damage to customer goods that were being transported
 - Human Injury – any injury and/or fatalities to any employees, contractors, subcontractors or any other 3rd parties.
 - Media Press – coverage of the event in newspapers, on television etc.
 - Productivity – loss of productivity due to the event happening
 - Property Damage – damage to vehicles and other assets of 3rd parties
 - Vehicle Damage – damage to our own vehicles. It is very important that all fields are completed fully in order to allow proper analysis.

STEP 3: CAPTURE THE KILOMETERS AND FINES FOR THE MONTH

- This is done in the GHG/GRI module in the monthly **Safety Report - IL – Month 2013** campaign.
- Please note that kilometers and fines can be captured in two ways:
 - Per site if the information is available. Some companies prefer to do it in this way as it will allow more detailed analysis of specific fleets allocated to specific sites, or
 - Use one site to capture the consolidated values for the company.

NOTES ON CAPTURING OF EVENTS AND IMPACTS

- Validation – do not validate any events or impacts captured until all information that needs to be captured, edited or uploaded is complete.
- The information captured in the EHS Management module is pushed through nightly to the current Safety Report in the GHG/GRI module. This means that Events/Impacts captured will only reflect on the Safety Report campaign the following day.

- Due dates
 - Capturing of events/impacts happens on an ad-hoc basis when any events occur.
 - Kilometers and fines must be captured by the 25th of each month.

CONCLUSION

- If the above is captured properly then the Safety Report will be complete and accurate.
- The other steps in the EHS module (Investigations, Statements, Evidence, Causes and Action Plans) do not input into the Safety Report, but is necessary when a full investigation and root cause analysis is required.