



Occupational Health and Safety Policy

Current as at 1st February 2011

1. Purpose of this Policy

The Company is committed to providing and maintaining a healthy and safe work environment for all Employees, contractors and visitors.

The Company wishes to:

- provide and maintain, as far as is practicable, a safe and healthy workplace;
- develop safe operating practices and procedures;
- promote co-operation and participation by all concerned in the health and safety program;
- comply with statutory requirements, award and agreement provisions, relating to occupational health and safety (OHS).

2. Scope

All Employees must adhere to the requirements of this policy. The Company must bring this Policy to the notice of all contractors and visitors and enforce their compliance of it.

3. OHS Risk Management

3.1 Risk management

The Company is committed to managing risks in the workplace by:

- (a) identifying the hazards and risks to health and safety associated with tasks and activities carried out by the Company;
- (b) assessing the risk of harm arising from those identified hazards;
- (c) eliminating, or if not reasonably practicable, controlling those risks;
- (d) monitoring and reviewing corrective actions on a regular basis for appropriateness and to seek to identify changes to the nature of the risk;
- (e) consulting with Employees and their representatives on matters which may affect their health and safety;
- (f) identifying, developing and providing appropriate information, instruction and training to equip managers, supervisors and employees with the knowledge and skills necessary to meet their responsibilities; and

- (g) developing, implementing and monitoring plans to put our health and safety policies and procedures into effect.

3.2 *Employee obligations*

The Company expects all Employees to:

- (a) take reasonable care to ensure the health and safety of themselves, and others at work;
- (b) assist the Company with its OHS obligations by reporting and recording all incidents (including incidents of violence or bullying) and hazards that may cause injury or illness (including damage to facilities or plant requiring maintenance);
- (c) participate in any training arranged to support the implementation of this policy;
- (d) co-operate with the Company as far as necessary to enable compliance with its OHS obligations;
- (e) use work equipment correctly;
- (f) act responsibly to ensure their own health and safety and the health and safety of other fellow employees;
- (g) participate in consultation on any OHS issues or information; and
- (h) co-operate in any return to work plan developed for injured staff.

3.3 *Injury management*

If an Employee is injured at work, the Company is committed to ensure that the occupational rehabilitation process is commenced as soon as possible after the injury, in a manner consistent with medical advice.

A speedy return to work is a normal practice and expectation and suitable duties/employment will be provided for an employee injured at work as part of the rehabilitation process.

If an Employee has a work related injury, either at work or on his/her way to and from work, the Employee must report the injury to either his/her line Manager or local HR within 24 hours.

After medical care has been received, the Company will seek advice in order to determine what arrangements are necessary for the employee's rehabilitation and return to work.

If the Employee is, according to medical judgement, well enough to return to work on altered or light duties, the Company will liaise with an appropriate rehabilitation provider to determine whether suitable duties are available and, if not, what other options are available. The Company will consult with the Employee prior to any arrangement for his/her return to work on suitable duties and will consult with the Employee on the general conduct of rehabilitation activities.

If the Employee is unable to return to their prior role, and suitable alternative duties are not available, his/her employment will remain for at least 6 months after the injury occurred.

4. Drugs & Alcohol

4.1 Drugs and alcohol

The Company recognises that the consumption of drugs and alcohol may have an adverse impact on work performance, safety and the Company's reputation.

4.2 Attendance at work

- (a) The Employees must attend work free of any impairment caused by (or under) the influence of drugs and/or alcohol.
- (b) The Company retains the right to refuse entry to any Employee deemed to be under the influence of drugs or alcohol.

4.3 Possession, consumption, distribution or sale of alcohol or drugs on the Company's premises

Employees must not:

- commence or return to work whilst their performance is adversely affected by alcohol or drugs (including prescription drugs);
- distribute or possess alcohol whilst at the workplace, except where gifts of alcohol are received by Employees in the course of their employment or the Employee has been given express authorisation;
- consume alcohol whilst at the workplace, unless the Employee is permitted to do so by virtue of an authorised work function;
- sell, possess, use or distribute drugs whilst at the workplace, in Company vehicles or during the course of employment.

4.4 Managing Employees under the influence of drugs/alcohol at work

If an Employee presents for work in a state indicative of being under the influence of alcohol or other drugs, their supervisor or manager may, upon assessment of the Employee, direct the Employee to:

- (a) attend first aid/report to a medical practitioner immediately; or
- (b) go home and request that the employee present for work the next day.

The nature of any time away from work will be determined by the Company on a case by case basis. Paid sick leave will only apply if a medical certificate is provided and paid sick leave entitlement is available.

On return to work and prior to commencing duty, the Employee's suitability for work shall be assessed by their Line Manager.

4.5 Employee assistance

The Company recognises that Employees with drug and/or alcohol related problems can be treated successfully and continue their careers with the Company.

Where appropriate, the Company may recommend an Employee attend internal or external drug and alcohol counselling.

5. Safe Practice directions

If any risks to health and safety are identified, the Company will implement practices to manage those risks and educate Employees accordingly.

The Law imposes certain obligations on an Employer not only to take all such actions as are reasonable to safeguard the health and safety of their Employees, but also to be able to show that they are doing so, by producing adequate written policies and procedures.

The Company fully accepts its responsibilities and thus it will strive to:

- Perform a detailed risk assessment in order to assess the risks in the workplace;
- Provide adequate control of the health and safety risks arising from our work activities;
- Have written health and safety procedures;
- Ensure that the workplace satisfies health, safety and welfare requirements for ventilation, temperature, lighting and staff facilities;
- Ensure safe and clear access to and egress from the building, including fire exits;
- Regularly check the premises room by room for structural defects, worn fixture and fittings or electrical equipment, and take the necessary remedial action;
- Ensure that all equipment is suitable for its intended use and is properly maintained and used;
- Ensure that all staff are aware of the fire procedure and regular fire drills are carried out;
- Ensure that all members of staff are aware of the procedure in case of accidents;
- Ensure that all members of staff are aware of and carry out their health and safety responsibilities;
- Consult with its Employees on matters affecting their health and safety;
- Prohibit smoking on the premises;
- Prohibit any contractor working on the premises without prior discussion with the Office Manager to negate any risks to the staff or users;
- Review and revise this policy as necessary at regular intervals.

The Company considers the issue of health and safety at the workplace with utmost importance. The breach of health and safety procedures by any Employee constitutes misconduct and will be dealt with as a disciplinary matter.

All Employees and the management must constantly be mindful of their responsibilities individually and collectively for the safety of themselves and their colleagues.

6. Breach of Policy

If it is reasonably believed an Employee has breached this policy, the Company will take appropriate disciplinary action against the Employee, which may include the termination of their employment. While in some cases a warning in conjunction with rehabilitation and support may be appropriate,

depending on the seriousness of the circumstances, repeated or a serious breach of the policy may warrant termination of employment.

7. Legislation

This policy is in accordance with the Laws of Malta and all relevant codes of practice.

The Policy is in addition to that legislation and will not be applied to reduce Employee entitlements or benefits under the legislation, as the legislation may be amended from time to time.

Please be aware that it is not possible to detail here all the health and safety matters that come up on a day-to-day basis, so staff and management must constantly be mindful of their responsibilities individually and collectively for the safety of themselves and their colleagues.

8. Responsible Officers at the Company:

First Aid: Debbie Ramadan, Francesca Gaspar and Duncan Bonello.

OHS: Debbie Ramadan and Francesca Gaspar.