



POL-151: VM Group Occupational Safety and Health Policy

Effective Date: March 06, 2023

Reach of Policy: VM Group

Date Approved: March 06, 2023

Scope: This policy governs all Team Members of the VM Group

Recalls/Retires: VM Group Occupational Safety & Health (OSHA) Policy v1.0

Also see: POL-119: VM Group Physical Security and Loss Prevention Policy, POL-127: VM Group Incident Management Policy, Pol -153: VM Group Team Member Wellbeing Policy, POL-128: VM Group Leave Policy



1 Introduction

1.1 Background

The Ministry of Labor and Social Security (MLSS) is leading a charge to ensure the protection of the Jamaican workforce through the enactment of a comprehensive Occupational Safety & Health legislation. This Bill, which is currently before parliament, covers all places of work in Jamaica. It is expected that some time will elapse before it is enacted however, urgent attention is required for workplace safety and health including the Human Immunodeficiency Virus (HIV) and Acquired Immune Deficiency Syndrome (AIDS). The Occupational Safety and Health Department (OSHD) in the MLSS commenced a programme for Voluntary Compliance (VCP) to assist organizations in Jamaica to prepare for important requirements under the proposed Bill.

Additionally, the VM Group is dedicated to employing best practices to ensure the safety and health of employees, customers and all parties who conduct work on behalf of the Group. As such, the Group has adopted the ISO 45001 (2018) standard in keeping with the VM Group commitment to creating a great place to work environment.

This Occupational Safety and Health (OSH) Policy has been developed to ensure the Group's adherence to the impending Bill's passage. It also details best practices for Occupational Safety and Health for the VM Group.

Team Members assigned to the following entities are governed by the VM Group Occupational Safety & Health Policy:

- VM Building Society (VMBS)
- VM Money Transfer Services (VMTS)
- VM Pensions Management (VMPPM)
- VM Wealth Management (VMWM)
- VM Property Services (VMPS)
- VM Innovations (VMI)
- VM Foundation



1.2 Governing Regulations

The regulations governing this policy are:

- Occupational Safety & Health Bill
- The Factories Act of Jamaica
- Public Health Act
- Mental Health Act

1.3 Related Documents

The following internal policy and procedures must be read in conjunction with this policy.

- VM Group Physical Security & Loss Prevention Policy
- VM Group Incident Management Policy
- VM Group Team Member Well-being Policy
- VM Group Business Continuity Policy
- VM Group Disciplinary policy
- VM Group Enterprise Risk Management Policy
- VM Group Evacuation Procedure



1.4 Policy Ownership and Maintenance

This policy is owned by the Group Chief Human Resources Officer – Group Human Resources and will be reviewed annually, except where there are circumstances impacting the financial sector which may result in a change of the review period. Such change shall be documented and supported with the reasons for the change.

Procedure and guideline documents are due for review every two years. However, where changes (externally or internally) such as a law, management decision or change process occur that affect the validity and effectiveness of the documents, a review will be triggered no more than 20 days of the change.

1.5 Policy Approval

This policy is to be reviewed and approved by the VM Group Executive Committee.

1.6 Scope of Policy

The policy is applicable to all properties, locations, branches, offices, and team members of the Victoria Mutual Group and will seek to address the following.

- The responsibility of the VM Group in adopting appropriate occupational safety and health practices to ensure the wellbeing of team members, contractors, third parties and customers who can be affected by its operation.
- The systems in place that promotes and maintain occupational safety and health standards across the VM Group.

It is binding on all contractors and subcontractors who undertake work on behalf of or in the name of the VM Group. It is also intended to be a part of any contractual or work and or agreement undertaken at the VM Group's properties, locations, branches and offices of the VM Group.

This policy is subject to the applicable laws of the jurisdictions within which VM has its operations. In the event that the policy is inconsistent with any such laws, then VM will be guided by the legal requirements in that particular jurisdiction and will apply those legal standards and conditions as required.



1.7 Policy Objectives

The Victoria Mutual Group shall provide a safe and healthy work environment for its valued team members, customers, visitors and suppliers. The organization is responsible for the development and implementation of strategies and programmes for Occupational Safety and Health on a continuous basis. This will be accomplished by:

- Adopting and maintaining measures to meet the applicable requirements of the Occupational Safety and Health Act (Bill awaiting enactment) and other related legislations and standards.
- Implementing strategies and programs aimed at adequately managing safety and health risks to persons while at the workplace.
- Providing adequate resources to facilitate the fulfilment of the VM Group's OS&H responsibilities.
- Ensuring that Executives, Managers, Supervisors and designated team members receive training in Occupational Safety and Health Management, Disaster Management & First Aid at a minimum every three (3) years while holding these persons accountable for ensuring that Team Members under their supervision comply with standards, rules, regulations, procedures and policies.
- Liaising with OSH representatives/Committee through the Safety & Security Department (SSD) and Group Human Resources and responding to weaknesses identified in order to ensure, as far as possible, a safe workplace.
- Implementing programs and strategies that facilitates proper monitoring and reporting of the Occupational Safety & Health Management System performance across the Group.
- Facilitating ongoing research and assessment to identify opportunities for continuous improvement and maintenance of the OS&H Management System.



2 General Policy Statements

1. The Manager – Safety and Security has oversight of the VM Group Occupational Safety and Health portfolio.
2. The VM Group shall ensure that the requisite insurance coverage for the organization and team members is obtained in keeping with the implementation of the OS&H policy requirements.
3. The Executive Leadership of the VM Group shall promote a culture in the organization that supports the objectives of this policy.
4. The VM Group shall exercise ‘reasonably practicable’ behaviour in the execution of its operations to ensure safety and health. This includes, but not limited to:
 - The provision and maintenance of work environment that is without risk to safety and health.
 - The provision of and access to adequate facilities for the welfare of Team Members.
 - Continuous monitoring of Team Member health and other work-related conditions to proactively response for the prevention of illness or injury.
5. The VM Group shall ensure that on-going risk assessment is conducted in accordance with the VM Group Risk Assessment procedures to:
 - Identify the likelihood of a hazard or risk occurring.
 - Design measures for minimizing or eliminating the hazard/risk.
 - Determine the associated costs of implementing each potential measure proportional to the hazard/risk.
 - Select and implement measures based on suitability and cost.



6. The organization shall take the necessary steps to remain compliant with regulatory requirements and international standards and provide adequate resources to effectively respond to requests and notifications within the specified timelines.
7. The VM Group reserves the right to take disciplinary action against any Team Member who refuses to comply with the approved OS&H policies in accordance with the *VM Group Disciplinary Policy*.
8. The VM Group shall investigate and submit completed case file via its Group Legal, Risk & Compliance on any reported breach of this policy.
9. The Occupational Safety and Health Management System shall be reviewed annually to ensure its continuing suitability, adequacy and effectiveness.
10. Strategic Business Unit/Departments who engage Third Party Contractors are required to guide those persons on the OS&H policies and procedures of the organization.
11. OS&H policy and procedure documents shall be easily accessible to team members of the VM Group.
12. The VM Group shall cultivate a safe environment that promotes mental health awareness and sensitivity and provides support to team members. This includes but not limited to:
 - Providing avenues where team members can confidentially discuss and receive help for any mentally related issue being experienced in their personal and/or work life.
 - Ensuring that the leave entitlements of the organization include consideration for mental health related illnesses and that adequate on-going support is in place for Team Members during the period of illness.
 - Implementing flexible work arrangements that cater to the needs of team members who are physically challenged whether permanently



or temporarily. These flexible work arrangements should also take into account support for psychological impact on team member.

- Implement strategies geared at gathering data about the mental health state of team members across the organization and design data driven programmes that foster mental health or remedy mental health associated issues.

The Occupational Safety and Health Committee in collaboration with the VM Group Wellness Committee shall have oversight responsibility of the team member well-being programme for the VM Group. See *POL-153: VM Group Team Member Wellbeing Policy*.



3 General Safety Rules

The VM Group is responsible for ensuring that it provides and maintains a work environment without risks to safety and health. The Group shall also ensure that it provides and maintains safe systems of work as far as is reasonably practicable.

Each team member must actively participate in the OS&H programme of the organization to ascertain the health of the OS&H structure of the Group. The following general safety rules must be observed during the performance of duty.

1. Team Members shall take reasonable care for his/her own safety and health.
2. Team Members shall take reasonable care that his/her acts or omissions do not adversely affect the safety and health of other persons.
3. Team Members shall comply with the Occupational Health and Safety policy and procedures that governs the operations of the VM Group.
4. All accidents, incidents/ unsafe acts, hazards and risks observed by Team Members shall be reported promptly.
5. Any injuries or accidents occurring on the premises of the VM Group should be treated promptly and the *Incident Report Form* completed by the individual as soon as reasonably possible.
6. In the case of an incident the Safety Marshall or Manager – Safety and Security with responsibility for overseeing and management of the OS&H system shall ensure that the location where a notifiable incident occurs is not disturbed until an **OSH Officer from** arrives at the environment unless otherwise directed by the OSH Officer.
7. Only equipment, machinery and tools in good condition shall remain in use on the job.
8. Safety signs shall be displayed at designated areas and entrances and exits must be free from blockage and hazards.
9. Good housekeeping practices shall be maintained daily in all work areas (personal work area/office); Team Members shall participate in the VM Group location defined safety protocols.



10. Physical altercations, fighting and/or harassment of any kind is strictly prohibited.
11. Team members performing duties from premises occupied primarily as a place of residence are subject to taking into consideration playing their part to uphold the guidelines of the OS&H system of the VM Group and to take responsibility for his/her health and safety and that of any property of the VM Group that might be in their position.



4 Occupational Safety & Health Framework

The Occupational Safety & Health environment of the VM Group adopts a framework that incorporates guidelines from the Occupational Safety and Health Act, 2017 and the ISO 45001:2018 standards which utilizes the Plan-Do-Check-Act Cycle (PDCA). The stages of the framework are as follows:

- Planning
- Support & Operation
- Leadership and Worker Participation
- Performance Evaluation:
- Improvement:





4.1 Planning

The Planning phase incorporates the assessment of the external and internal environment to identify risks and opportunities in achieving the objectives of the Occupational Safety & Health policy of the VM Group. This includes:

- Preparation of plans for periodic risk assessment to identify existing and/or emerging risks that need to be addressed to prevent or reduce any adverse effect to the VM Group due to internal or external changes. A planned prioritized approach will be established to address risks identified based on potential impact to the OS&H Management System and organization strategic objectives/roadmap.
- Development of strategies and programs that facilitate:
 - Hazard identification and implementation of measures to mitigate against them.
 - Adequate safety and security management for team members, contractors, third parties, customers and others who may be affected by the operations of the VM Group.
- Designing programs that aid in raising and maintaining the awareness, education and competence of Team Members to ensure that the Occupational Safety and Health policy is upheld.
- Development of a framework that facilitates continuous improvement of the Occupational Safety and Health environment, emergency preparedness and business continuity.
- Resource planning to adequately meet the daily operational needs and Occupational Safety and Health obligations (regulatory or otherwise) to both internal and external stakeholders as well as to ensure continuous improvement and maintenance of the OS&H environment.



4.2 Support and Operation

The Support and Operation phase of the framework focuses on the resources and processes in place to achieve the Occupational Safety and Health objectives of the organization.

4.2.1 Support

The support aspect of this phase includes the following.

- Ensuring that all team members are aware of their contribution to the objectives and practices of OS&H and the benefits of improvement to the performance of the OS&H Management System.
- Conducting periodic assessment to determine the organization's competence level against stated objectives, policy, international standards and legislation. This will be achieved by but not limited to:
 - Determining the competence of team members and the real or potential impact to the overall performance of the OS&H management system of the organization.
 - Taking the required actions to acquire and maintain the desired competence level and evaluation of the effectiveness of the actions taken.
 - Maintaining documented evidence of actions taken to improve competence of Team Members and the overall competence achieved by the organization.
- Provision of the required resources to successfully establish, implement, maintain and conduct continuous improvement activities.
- Support staff in maintaining alertness and a self-preservative mindset while on the job, through reinforcement measures and training where applicable.
- Ensure that both internal and external communication is managed in accordance with established communication protocols.



4.2.2 Operation

The operation aspect is in place to facilitate operational planning, execution, maintenance and improvement of the OS&H processes and controls to achieve the following operational requirements.

- Reduce or eliminate hazards and risks.
- Identify, track and monitor change management requirements impact on Occupational Safety and Health principles.
- Manage procurement needs in respect of OS&H, and emergency preparedness and response in accordance with the established procurement policy and procedures.

To meet the operation requirements, the VM Group must:

- Develop and implement control measures across the Group that reasonably prevent or reduce the occurrence of incidents and injury and serve as a medium for identifying improvement needs.
- Develop and maintain documentation of OS&H processes, procedures, records and controls.
- Conduct ongoing analysis and assessment of the operating environment to identify OS&H gaps and risks due to:
 - Internal factors such as (not an exhaustive list):
 - i. Re-engineering or reorganization of workspaces
 - ii. Process changes
 - iii. Change Management activities that support the introduction of new and improved products and services
 - External factors such as (not an exhaustive list):
 - i. Changes in regulations and other external requirements
 - ii. Advancement of Technology



- iii. Changes in knowledge or information about hazards and OS&H risks
- Adequately budget for and support procurement activities relating to OS&H to ensure that appropriate and adequate resources are secured to meet the operational needs and to effectively respond to emergency situations.



4.3 Leadership and Worker Participation

Leadership and worker participation sits at the centre of an effective Occupational Safety and Health Management System.

4.3.1 Executive Leadership Participation

The Executive leadership of the VM Group is ultimately responsible for setting the OS&H tone of the organization. Executive leadership should take the necessary steps to ensure that:

- It establishes and promotes a culture of accountability where it assumes overall responsibility for the prevention of work-related injury and ill health as well as the provision of safe and healthy workspaces.
- OS&H policy and objectives are established and upheld across the Group in accordance with the strategic direction of the organization.
- Facilitates an environment where OS&H standards are integrated into business processes.
- It provides the required resources to establish, implement, maintain and improve the OS&H Management System of the organization where feasible.
- Supports efforts to maintain and improve the overall OS&H competence of the organization.
- Supports continuous improvement initiatives.

4.3.2 Team Member Participation

The cooperation and coordination of team members play an integral role in the organization's capability to maintain OS&H objectives. Team members shall:

- Adhere to the guidelines detailed in OS&H policy and related procedures.
- Fulfill training requirements and all other obligations outlined and delivered by the organization that is in alignment with upholding OS&H standards.



- Assist the organization in maintaining safe and healthy workspaces by
 - Taking personal responsibility for one's safety and wellbeing, as well as the wellbeing of fellow team members.
 - Staying knowledgeable about the OS&H standards of the organization and related changes.
 - Identifying and reporting hazards, risks and incidents to the relevant stakeholder(s).
- Volunteer to assist the Safety and Security unit achieve and maintain its objectives.



4.4 Performance Evaluation

An adequate performance evaluation system shall be established, implemented and maintained to accurately determine the performance of the OS&H Management system of the organization. The system should allow for the analysis and reporting of key performance indicators (KPIs) that will reflect the overall health of the OS&H Management System.

The components of the performance evaluation system must be clearly defined to properly monitor and measure key elements of the OS&H system. This will assist the Group to determine OS&H performance level, aid in the identification of gaps within the current operating environment and generate data for potential improvement opportunities. The system should include:

- The specific KPIs or units that should be measured and monitored.
- The criteria against which the relevant KPIs or units will be evaluated.
- A structured approach on the methods of monitoring, measuring and interpreting data to ensure correctness and consistency.
- The intervals when data is to be generated and reported.

Review of the system should be conducted annually or when there are notable changes that may impact the OS&H environment so that strategic, regulatory or international standard alignment is maintained.

4.4.1 Compliance Evaluation

The VM Group shall establish and maintain a structured approach for evaluating adherence to compliance requirements to meet regulatory and international obligations. The evaluation process must be documented, and the respective timelines clearly stated. Documented evidence of the evaluation results must be maintained and stored. See section 6 for details on documented information.



4.4.2 Internal Audit

The Group Internal Audit shall conduct audit annually, to identify risks and breaches and measure compliance to Occupational Safety and Health objectives. The audit shall assess compliance with:

- Legal and other OS&H regulatory requirements.
- ISO 45001 standards.
- The requirements of the *VM Group Occupational Safety and Health Policy* and procedures.

The results from the audit must be reviewed and recommendations tracked until the necessary action to correct or improve is implemented.

A safety and security audit must be conducted on all new and upgraded buildings, owned, leased or rented by the VM Group before handing over for operational use.



4.5 Improvement

The Group utilizes the Plan-Do-Check-Act cycle in executing its Occupational Safety and Health functions. Periodic reviews, assessments, analyses, audits and performance evaluations serve as opportunities to identify areas for improvements.

Continuous improvement efforts must be structured and interwoven within the OS&H functions and processes. All team Member play a significant role in helping the organization identify threats and opportunities so that preventative or remedial measures can be implemented to improve the competence of the OS&H Management System. Participation in the OS&H continuous improvement efforts assist the organization in enhancing its objective of creating a great place to work environment.

The following elements of the OS&H Management System must be well defined and integrated into the operations of the business in order to increase the probability of identifying value added improvement opportunities.

- The establishment of OS&H related policies and standard operating procedures for all related OS&H processes.
- Development of a structured incident management system for tracking incidents and nonconformities in the organization (incident or nonconformity investigations and corrective actions).
- Defined service level agreement for reporting, investigating, and taking corrective actions to any breach of OS&H protocols outlined by the organization, local and international legislation and standards.
- Evaluation of the existing OS&H Management System against defined metrics determined by the organization, local and international regulations and standards for Occupational Safety and Health.
- The establishment of a risk assessment approach in accordance with the VM Group enterprise risk management policies and procedures.
- Inspection and auditing functions.
- Job hazard analysis (job safety analysis) and task related assessment.



- Ergonomic and other injury prevention related assessment, example workstation evaluation).
- Ensuring that OS&H requirements are taken into consideration at the preliminary stage in the establishment of facilities, equipment or processes.



5 Roles and Responsibilities

5.1 President & Chief Executive Officer (CEO)

The President & CEO has overarching responsibility for Occupational Safety & Health for the VM Group.

5.2 Executive Leaders

The Executive Leaders of the VM Group shall ensure the operations and efficient running of the OS&H Committee by:

- Conducting periodic consultations with those designated with OS&H responsibilities to ensure implementation of agreed strategies.
- Establishing such occupational safety & health service for workers as may be prescribed.
- Ensuring that Team Members/Supervisors/Managers are certified as competent persons under the OSH (Bill) Act and are properly equipped to recognize and handle any potential or actual danger at the workplace.
- Applying sanctions/disciplinary action, in consultation with the VM Group Human Resources, on any Team Member who refuses to comply with the Occupational Safety and Health Policy.
- Taking overall responsibility and accountability for the prevention of work-related injury and ill health as well as the provision of safe and healthy work places and activities.
- Ensure that the OS&H policy and related OS&H objectives are established and are compatible with the strategic direction of the organization.
- Ensuring the integration of OS&H requirements into the organization's operations.
- Ensure that the resources needed to establish, implement, maintain and improve OS&H across the organization is available.



- Directing and supporting persons to contribute to the effectiveness of OS&H in the organization.
- Support other management roles to demonstrate their leadership as it applies to their area of responsibility for OS&H.

Note: The OS&H Committee Roles and Members are outlined in Appendix C

5.3 Occupational Safety and Health (OS&H) Committee:

The persons designated as the OSH Committee Members shall:

Take reasonable and practical steps to safeguard the safety and health of the workers. These steps shall be in keeping with the provisions of the Occupational Safety and Health Act (Bill), the OS&H ISO 45001 Standard: 2018 as well as other complementary measures not specified in the Act.

- Monitor the OS&H performance within the Group as stipulated by legislation, international standards and VM Group's OS&H strategy.
- Identify and document any situation which may be hazardous to workers.
- Enforce compliance with the Occupational Safety and Health Act and other related policies and procedures for the safety, health and protection of its workers.
- Act on reports of all near misses, personal injuries and property damage involving workers at the workplace and ensuring that appropriate measures are put in place to prevent re-occurrence.
- Perform those other duties and follow procedures prescribed by the legislation.
- Maintain responsibility for the implementation of the OS&H Policy and adherence to the legal and technical requirements of the legislation and requirements of ISO 45001:2018.
- Provide workers with information about workplace hazards, as well as educate them on how to address health and safety concerns.



- Ensure the completion of periodic review of the OS&H Management System to determine competence of team member and system.
- Perform assessment of Team Members' knowledge and training on Occupational Safety and Health matters and make recommendations to remedy the problems.
- Review training material and methods to determine suitability and make improvements where inadequacies are found.

5.4 Manager – Safety and Security

The Manager of safety and security shall be responsible for:

- Overseeing the implementation of processes and all requirements to which the organization is obligated.
- Maintain standard operating procedures and control of the Occupational Safety and Health system in the organization.
- Work closely with team members and the legal department where applicable to amicably resolve incidents and matters arising that have resulted in injury or ill-health.
- Conduct the requisite assessments of the OS&H Management System to determine competence.
- Conduct research to identify advancement in security technology and OS&H best practices and making recommendations for adaptation to suitable options.
- Manage internal and external communication of OS&H related matters in collaboration with Group Corporate Affairs and Communications.
- Oversee the operation of persons with responsibility for reviewing, monitoring, reporting and implementing OS&H initiatives at the workplace.
- Prioritizing and oversee continuous improvement efforts.



- Liaison with the Group Legal and Compliance Unit on legal matters relating to Occupational Safety and Health.
- Ensure that internal and external reports are completed on time and submitted to the relevant parties.
- Comply with notifications and requests from regulators and certifying body.
- Report notifiable incidents immediately to the board of Directors after becoming aware of the occurrence.

Note: Records of notifiable incidents must be kept for at least six years.

5.5 Safety Marshalls

Persons who have been designated and trained as Safety Marshalls have a significant responsibility under the OS&H policy, which include but is not limited to:

- Conducting sweeping operations of the building and accident/incident scene protection/preservation.
- Reporting to the Chief Safety Marshal for the facility, the status of the occupants and the building after post evacuation.
- Monitoring all aisles, corridors and exit doors on an on-going basis to ensure that they are free from obstructions.
- Ensuring that all new Team Members on the floor assigned are made aware of the company's Disaster Management Plan.
- Disseminating relevant Disaster Management /Preparedness brochures, papers etc. to staff on the floor/department assigned.
- Assisting in planning and conducting emergency evacuation drills.
- Assuming control for emergency evacuation in the assigned designated area.
- Conducting headcount in assembly areas after an evacuation.
- Assisting in the training of staff in Disaster Preparedness at the workplace.



- Reporting any potential risk or hazard to OS&H Committee or their respective Supervisor /Manager.
- Make recommendations to the OS&H Committee for the improvement of the safety and health of the workers.
- Make recommendation to the OS&H Committee regarding the establishment, maintenance and monitoring of programmes, measures, and procedures relating to the safety and health of workers.

5.6 Group Legal, Risk and Compliance Unit

The Group Legal, Risk and Compliance unit is responsible for:

- Providing guidance on legal matters and OS&H reported incidents.
- Supporting OS&H risk assessments and making remedial recommendations where necessary.

5.7 Group ICT and Group Digital Transformation

Group ICT and Group Digital Transformation are responsible for providing suitable solutions to assist with monitoring, measuring and reporting of OS&H performance and activities.

5.8 Group Internal Audit

Group Internal Audit is responsible for conducting annual audits on the OS&H Management System and operations to:

- Determine conformity to policies and procedures.
- Identify gaps and weaknesses in the OS&H Management System.



5.9 Group Business Process Improvement

The Group Business Process Improvement unit is responsible for:

- Assist with the reviewing of OS&H policies and procedures.
- Maintain version control of policies and all related procedures.

5.10 Team Members

VM Group Team Members shall adhere to the Occupational Safety and Health policies and procedures. Additionally, Team Members shall:

- Ensure that they do not endanger the safety, health and physical wellbeing of other persons at or in the environs of the workplace.
- Cooperate with the company by ensuring that protective devices, equipment or clothing required for use as specified by the company and/or the OSH Act (Bill), OSH ISO 45001 Standards:2018 and other legislation are used or worn.
- Consult and cooperate with OS&H Committee on any safety and health matter, as necessary.
- Report to their Supervisor/Manager or Safety Marshals any unsafe conditions observed and, if not remedied to their satisfaction, to their Supervisor/Manager.
- Obtain first aid assistance and or seeking medical attention in the event of injury on the job.
- Report to their Supervisor/Manager, the occurrence of any accident/incident.
- Assist disabled persons and visitors in the event of an emergency evacuation.
- Follow safe work procedures and practices to avoid damage to property or health.
- The effective implementation of this procedural document will support openness and transparency.



6 Documented Information

The processes and activities carried out in the OS&H Management System of the organization must be documented and stored within specified periods. See section 6.1 for further information on retention schedule. Documents should be stored in a centralized space to facilitate organization and easy retrieval, except where such documents are managed by a specific tool i.e., Human Resource Management System.

The documentation of OS&H activities and results of those activities provides evidence of the organization's commitment to ensuring the safety and health of Team Members and preserving the overall health of the overall OS&H Management System of the Group.

Documented information may contain sensitive and or confidential data. As such, these documents must be securely stored (where physical copies exist) or adequately backed up (in the case of electronic copies). Access to documented information must be restricted.

Documented information serves as a source of:

- Increasing and maintaining awareness and knowledge of the OS&H Management System
- Maintaining audit trail
- Supporting risk assessment activities
- Assessing process and performance gaps
- Identifying weaknesses of controls
- Identifying improvement opportunities
- Providing evidence of compliance with local regulations and international standards.



The following outlines the documented information of the OS&H Management System for the VM Group.

- OS&H policies, processes and procedures.
- OS&H objectives and plans to achieve them.
- Methodology(ies) and criteria for assessing OS&H & other risks to the OS&H Management System.
- Legal and other requirements applicable to hazards, OS&H risks and Management System.
- Documented evidence on assessment of competence, the actions taken to improve competence level and the effectiveness of the actions taken.
- Appropriate communication evidence from internally and externally sources and responses to those communication where applicable.
- Documented evidence on hazard and risk identification, actions or measures implemented, and evaluation conducted to determine effectiveness of actions or measures implemented.
- Incident records and all other relevant incident management information.
- Results of monitoring, measuring and analyzing the OS&H Management System and performance.
- Compliance evaluation results.
- Documented evidence of audited results and plans and actions to remedy audit points.
- Results of OS&H Management System annual reviews.
- Notices and requests issued by Regulators and international certifying bodies.
- Documented evident on continuous improvement efforts and results.
- All other information as deemed relevant by Management.



6.1 Documented Information Retention Schedule

A retention schedule shall be implemented and maintained that details the various categories of OS&H documented information, the type of documents that falls under each category and the period of retention for each category. Where a set of documents are managed by a specific tool, same should be noted on the retention schedule.

Strict observance to regulatory timelines must be maintained.



7 Incident Management

A comprehensive Incident Management System shall be developed and maintained to track the progress of and report on incidents and near-misses that may or have resulted in injury or ill health to team members. The Incident Management System should assist the Safety and Security unit with the following.

- Obtaining detailed information on incidents, nonconformities and near misses that may or have led to injury or ill health of team members.
- Properly track and report on the progress of incidents and near misses and the measures employed to investigate and resolve them.
- Provide data for analysis to identify risks and gaps within the OS&H Management System and to assess the system's performance.
- Identify improvement opportunities.

The incident management process must be documented. All actions taken and measures implemented to remedy each occurrence must be documented and stored for the specified timeframe.

7.1 Evacuation Measures

The VM Group must establish and implement appropriate evacuation procedures. Emergency exits and assembly points must be properly labelled.



8 Regulatory Notices, Visits and Fines

The regulators may from time to time visit the environs of the VM Group after formal notification to conduct assessment of the OS&H Management System or conduct investigation into a notifiable incident that has occurred.

VM Group shall comply with all notices and requests issued by the regulators and provide the necessary support resources where applicable. The necessary steps must be taken to meet stated deadlines for requests and recommendations given.

Occupational Safety and Health representatives must familiarize themselves with the legislation to be informed of what constitutes a breach and the associated fines. Appropriate actions must be taken and suitable measures implemented to prevent breaches of the regulation.



9 Complaint Handling & Resolution

An effective Complaints Handling and Resolution process will be developed to address all complaints related to Occupational Safety & Health. This process will be supported by all Team Members as well as persons with designated roles and responsibilities.

- Safety Marshals will be required to receive and document safety and health related complaints from Team Members for further investigation.
- All complaints are to be directed to the Reporting Supervisor/Manager.
- Urgent or unresolved issues are to be directed to the Manager, Safety & Security and OS&H Committee, for recommendations and/or resolution.

All Team Members have the right to report any unresolved health or safety issues to the Occupational Safety & Health Department in the Ministry of Labour & Social Security. However, this is a last resort when all internal reporting channels have been exhausted.