

OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

The ESS Support Services Worldwide (ESS) Occupational Health & Safety Management System is an integral part of the overall management of the business.

The purpose of the system is to eliminate or minimize the risk to employees and others who may be exposed to risks associated with ESS' activities. ESS is committed to the continual improvement of the system.

Policy

It is the Company's policy to provide and maintain safe and healthy working conditions, equipment and systems of work for all its employees and others who may be present at the workplace. The Company provides information, training and supervision as required for this purpose. Contractors are assessed to ensure that their Safety Management System is compatible with ESS' and Client requirements.

Planning

ESS maintains procedures for the ongoing identification of hazards, the assessment of risks and the implementation of necessary control measures, in respect of routine and non-routine work activities.

Procedures are kept current with the applicable legislation and other OH&S requirements. Requirements and objectives are clearly communicated to the different levels within the organisation.

The Health Safety & Environmental Programme is produced annually and is communicated to employees and other interested parties. The achievement of objectives is reviewed at HSEQ Management Meetings.

Implementation and Operation

Managers and staff shall understand their roles and responsibilities. Instruction, training and supervision is provided to ensure that work is carried out competently and to the standards laid down in company policy and procedures, to meet client and legal requirements.

Safety issues are communicated at least once per trip at HSE meetings at which employees are consulted and encouraged to contribute to the continual improvement of workplace health and safety. Communications also includes: personal visits by operations, personnel and HSEQ management, written think plans, a trip returns feedback mechanism, quarterly health and safety briefings, feedback circulars and a quarterly newsletter.

Competence Assurance covers all the activities relating to the provision of hotel services. Where ESS personnel occupy safety-critical roles, the Client Company shall specify standards and assess ESS employees.

The potential of incidents and emergencies are assessed and the responses to them are planned to prevent or mitigate the likely illness or injury that may be associated with them.

Checking and Corrective Action

The Unit Manager monitors performance through standard checks. These include: Hygiene & Safety Inspections and Machinery Safety & Maintenance Checks. Inspection Summaries and HSE Meeting Minutes are returned to operations management each trip for review, feedback and appropriate action. Audits are carried out at all locations to verify adherence to Company Policy

and Procedures. Reports are communicated to Senior and Unit Managers and clients. All identified non-conformances are discussed and corrective actions agreed. Investigation and analysis of all accidents is carried out to identify root cause and to implement possible changes.

Management Review

The effectiveness of the Occupational Health & Safety Management System is formally reviewed annually to ensure its continuing suitability, adequacy and effectiveness. The review shall include evaluation of performance and identification of possible changes to policy and procedures to meet changing circumstances and the aim of continual improvement.