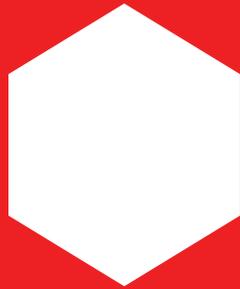




# Quality Service



Quality Inspectors Ltd.

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HEALTH, SAFETY & ENVIROMENTAL MANAGEMENT SYSTEM

## **Health, Safety and Environment Policy Statement**

**QIL's management accepts responsibility for promoting and protecting the health, safety and well-being of all its personnel involved in delivery of services to client companies. QIL is further committed to ensuring that all contracted activities performed are done in a way that safeguards the natural environment, thereby minimizing the impact our activities have on the environment.**

**QIL's safety program is designed to realize a zero injury workplace. We are committed to continuously improving our performance by reviewing our practices, policies and procedures to identify opportunities for reducing accidents and enhancing compliance.**

**Our philosophy is that the well-being of the Company is highly dependent on the health and safety of our workforce. The Management of QIL thus promises to ensure that every reasonable precaution is taken to protect all employees.**

**Supervisors are responsible for ensuring that machinery and equipment is not only safe but that every employee works in compliance with established safe work practices and procedures for each piece of equipment and machinery. Employees must receive adequate training in their specific tasks to protect their health and safety.**

**All supervisors and employees are required to work in compliance with the Occupational Health and Safety Act and all applicable regulations as well as safe work practices and procedures as adopted by QIL.**

**While every employee of QIL has set responsibilities in regards to workplace safety, it is the collective responsibility of all employees to ensure a safe and healthy workplace. By doing so, QIL can help prevent unwanted losses, personal injuries and/or illnesses, and realize a zero injury workplace.**

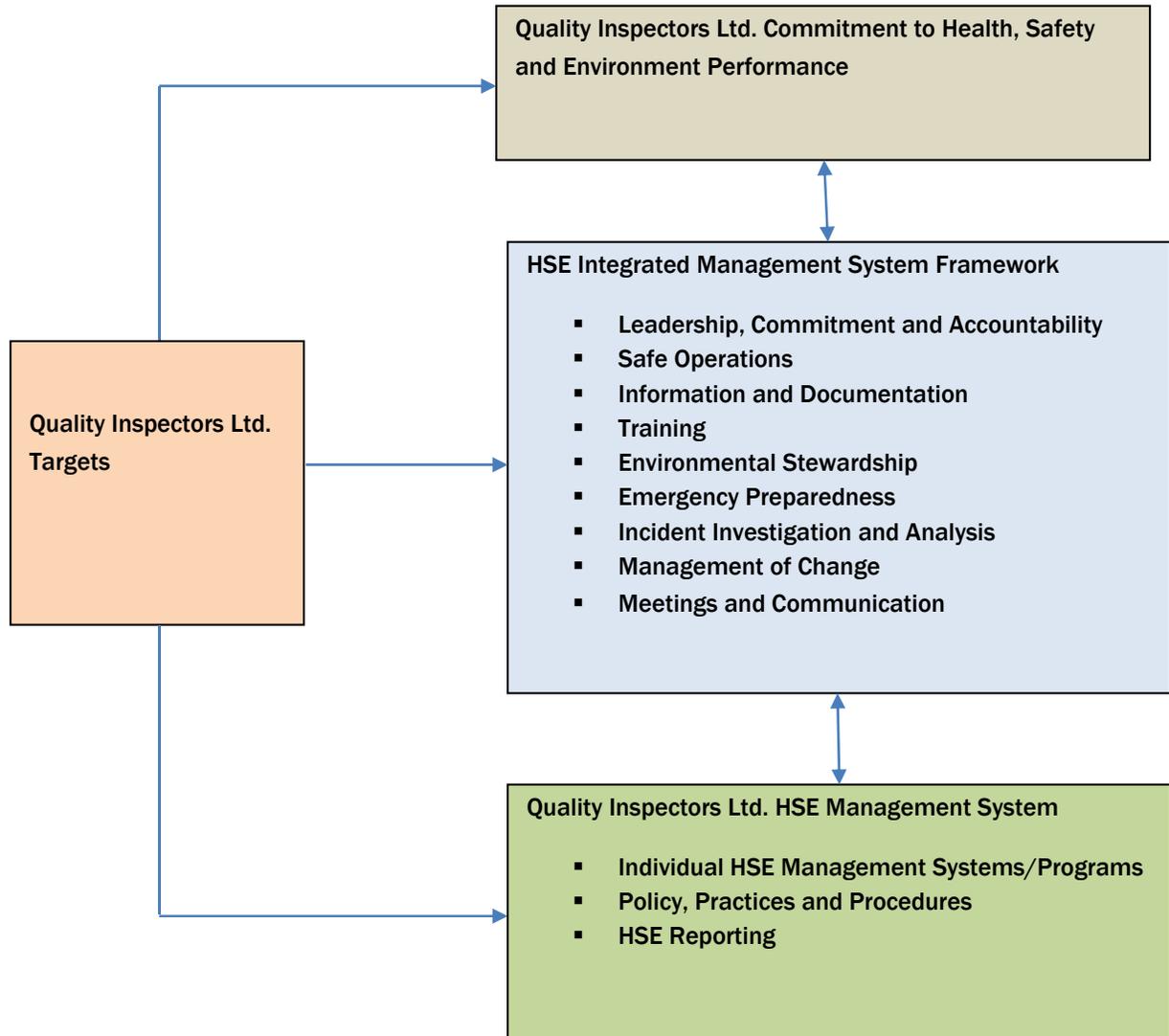
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**Reuben Kiambuthi  
Director  
Quality Inspectors Ltd.**

**Date: May 2013**

## Health, Safety and Environment Management System

*Figure 1* below provides an illustration of QIL's Health, Safety and Environment Management System. A complete description of the items highlighted in *Figure 1*, can be found from Page 9 of this section.



**FIGURE 1: HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM**

## **Health, Safety and Environment System Tool Box**

- **Legislative compliance**
- **Emergency response plan**
- **Common HSE processes**
  - **Incident investigation**
  - **Risk management**
  - **Behavioral based safety programs**
- **Safe operating procedures**
  - **Orientation**
  - **Permit to work**
  - **Working at heights**
- **Training**
- **Sharing of best practices**
- **Environmental practices**
- **Health**

## Elements of QIL's Health, Safety and Environment System

### Leadership, Commitment and Accountability

Employees from all levels in QIL are responsible for leading and engaging the workforce in meeting QIL's HSE goals and objectives. Managers are held accountable for accomplishing this by demonstrating correct HSE behavior, as well as by clearly defining employee HSE roles and responsibilities. Managers are also required to avail the necessary resources, measure, and to review and continuously improve the organization's HSE performance.

#### *Directors Expectations of Managers*

- Reinforce and reward positive HSE behavior.
- Engage in clear two-way communication with employees and others stakeholders on HSE issues
- Visibly demonstrate involvement and commitment to improve HSE performance.
- Integrate HSE QIL's management expectations into business planning and decision making processes, and ensure that documented systems are in place to deliver these expectations
- Ensure sufficient HSE management systems are developed, documented, implemented and supported throughout the organization.

### Safe Operations

All employees) shall utilize a comprehensive HSE program to prevent injuries, illness and incidents for all operations.

#### *Directors Expectations of HSE Lead*

- Develop safe work practices/procedures for identified hazards prior to the commencement of any operation
- Develop and implement a risk assessment process to periodically identify, assess and mitigate the safety and health risks related to operations.
- Develop a comprehensive road safety management program to mitigate and minimize risks and promote motor vehicle safety.
- Actively access and manage risks introduced by concurrent operations.
- Establish a medical surveillance program that includes procedures for identification and control of workplace procedures
- Develop and implement a training program to ensure that employees have skills and knowledge to perform their jobs competently, in an incident free manner and in compliance with all applicable laws, regulation, company polices, and requirements
- Ensure that new or transferred employees undergo specific and appropriate job site orientation training which covers among other safety elements, HSE rules and emergency procedures.

### Information and Documentation

Accurate information is essential to assess and manage risk. Information on the configuration and capabilities of processes, properties for our services, materials handled,

potential operation integrity hazards, and regulatory requirements. Confidential information will be controlled and readily available to authorized personnel upon submittal of the necessary authentication documentation.

*Directors Expectations HSE Lead*

- Drawings and other pertinent documentation necessary for sound operation and maintenance of equipment and facilities will be identified, accessible, accurate and appropriately safeguarded.
- Information on the potential hazardous materials will be kept current through an MSDS (Material Safety Data Sheet).
- Applicable laws and regulations, licenses, permits, codes, standards and practices will be identified, documented and kept current.
- Employee health and medical records are maintained with appropriate confidentiality and retained as necessary

**Training**

QIL's workforce will be carefully selected, trained, and their skills and competencies regularly assessed.

*Directors Expectations of Managers*

- Design and implement a process for recruitment, selection and placement of new personnel to ensure that personnel are qualified, competent, and physically and mentally fit for their assigned tasks.
- Ensure that QIL's workforce has the required skills and training to competently perform their tasks in a healthy, safe and environmentally sound manner. Training will be regularly evaluated to determine its effectiveness.
- Design and implement a program to ensure that the performance of the workforce is not impaired by drugs and alcohol.
- Design and implement a process for the management of personal safety will be in place to ensure that:
  - Employees proactively and routinely identify unsafe behaviour on the worksite
  - Employees consistently recognize and proactively mitigate operational, procedural and physical hazards.
- Design and implement an occupational health management program for all employees..

Record and review pertinent health data based upon assessed risk to personnel, exposure monitoring, proper protective and preventative measures, early detection and diagnosis.

**Environmental Stewardship**

QIL will continually strive to improve environmental performance and mitigate impact from our operation.

*Directors Expectations of HSE Lead*

- Develop and implement a process to assess and mitigate significant risks and impacts to human health and the environment associated with operations, releases and wastes.
- Ensure that operations are managed to comply with the Company's HSE Policy and environmental laws, regulations and approvals.

### Emergency Preparedness

Emergency planning and preparedness are essential to ensure that, in the event of an incident, all necessary actions are taken for the protection of our workers, the public, the environment and our assets. Emergency management plans will be maintained to cover all phases of business. These plans will identify equipment, training and personnel necessary to effectively respond immediately and effectively to emergencies.

#### *Directors Expectations of HSE Lead*

- Ensure that emergency management plans are based on the risks that potentially impact the business. These plans should be documented, accessible, clearly communicated and align to the QIL emergency management system.
- Ensure that equipment and trained personnel needed for emergency response are identified, tested and readily available.
- Ensure that drills and exercises are conducted to assess and improve emergency response capabilities.

### Incident Investigation and Analysis

Incidents will be reported, investigated and analysed to prevent recurrence and improve our performance. Incident investigations will focus on root cause and/or system failures. Corrective actions and preventive measures will be utilized to reduce future injuries and losses.

#### *Directors Expectations of HSE Lead*

- Ensure all HSE incidents, including near misses, are openly reported, investigated, analysed and documented.
- Ensure that all major incidents are investigated by a multi-functional team with participation by senior QIL Management.
- Ensure that incident investigations, including identification of root causes and preventative actions, are documented and closed out.
- Ensure that lessons learned from investigations are shared across QIL, and personnel are expected to take appropriate action upon receipt of such information.

### Management of Change

Changes (including temporary) in operations, procedures, standards and personnel, must be evaluated and managed to ensure that HSE risks arising from these changes remain at an acceptable level.

### *Directors Expectations of Managers*

- Ensure the design and implementation of a process for the management of change to equipment, processes, products or the organization. The management of change process shall address:
  - Both permanent and temporary changes
  - Authority for approving changes
  - Compliance with regulations and approved standards
  - Evaluation of health and safety hazards, environmental impacts and mitigation
  - Documentation, including reason for change
  - Communication of risks associated with the change and required mitigation measures
  - Training
  - Changes in operating procedures
  - Up-dating task and site hazard assessments.

### Meetings and Communication

QIL will periodically validate the implementation of, and compliance with these management expectations to assure ourselves and stakeholders that management processes are in place and working effectively. This will involve internal self-assessments, and appropriate external assessments. QIL will use this information to improve its performance and processes.

### *Directors Expectations of Managers*

- Ensure that HSE performance leading and lagging indicators are established, communicated and understood throughout the organization. A system should be put in place to monitor key performance indicators, goals and objectives of the corporation.
- Ensure that findings from learning processes (audits, incident investigations, near misses, etc.) are prioritized, tracked and used to improve the HSE management system. The completion of identified actions should also be tracked to ensure timely completion.
- Ensure that QIL's Departmental heads report HSE performance data, as part of the QIL reporting requirements. Further, ensure that benchmarking occurs to assure that systems and programs remain current and effective.
- Ensure that the results from incident investigations, non-compliances, compliance audits are reviewed by management.
- Ensure that new or changed legislation and other requirements as well as changing stakeholder expectations are monitored to understand the impact on the Company's plans and programs.

### Health, Safety and Environmental Policy

QIL commits to an open dialogue with employees and other relevant stakeholders with respect to HSE issues associated with Company operations.

***Directors Expectations of HSE Lead***

- **Ensure workers have been made aware of the hazards and the control measures for any given task or job.**
- **Ensure that HSE issues and performance are an integral part of every meeting including management, field operations and project meetings.**
- **Establish a process, including documentation, for monitoring the status of the Key Actions identified in meetings to address current HSE issues and improve the Company's HSE performance.**
- **Provide opportunities for all stakeholders to raise HSE issues.**



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