

ENVIRONMENTAL, HEALTH AND SAFETY POLICY

FOR



SNOWDESERT (EA) LIMITED

Absolute Cooling Solutions

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NAIROBI

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INTRODUCTION

SNOWDESERT (E.A) LTD recognizes the role played by industries in environmental pollution. To this end, the company has put measures in place to ensure that their activities do not endanger the natural environment. Similar emphasis is placed on creating a safe working environment for our employees.

All employees are required to participate in the attainment of these goals; making the environment safe for themselves and for others.

The company will take all the necessary steps to comply with legislation governing its activities.

All personnel holding management positions are responsible for the health and safety of employees in their respective departments. Their specific responsibilities are outlined elsewhere in this document. The company will make arrangements to identify and satisfy training needs.

The policy statement will be brought to the attention of the employees and will be reviewed and amended regularly as warranted by changes in legislation or company policy. Any such changes will be communicated promptly to all concerned persons.

SNOWDESERT (E.A) LTD

ENVIRONMENTAL HEALTH & SAFETY POLICY STATEMENT

In a bid to play its part in environmental protection, as well as the creation of safe working environments, **SNOWDESERT (E.A) LTD** is dedicated to the following:

1. Developing an EHS policy and management to facilitate proper handling of all matters pertaining to EHS.
2. In recognition of our potential for pollution, we will strive to protect the natural environment. We aim to minimize pollution as much as possible, paying close attention to our waste disposal and emissions.
3. Protecting all employees through the provision of suitable and adequate protective devices.
4. Ensuring that all processes and plants are safe, by conducting regular checks and carrying out the necessary maintenance.
5. Training all employees on matters of Environment, health and safety.
6. Involving all employees in attaining stipulated EHS goals, and empowering them to take responsibility in this area, regardless of their rank.
7. Complying with the requirements of all legislation governing our practices. In the same vein, we will keep ourselves informed of any changes in EHS legislation, and make the necessary adjustments.
8. Beefing up our internal capacity to improve our EHS performance. Where required, we will work with external experts towards the same.
9. Conducting regular audits and inspections to monitor our performance in the area of EHS, accompanied by introduction of follow up programmes to implement recommendations of such audits.
10. Ensuring the safety of all visitors to our premises
11. Participating in national (and worldwide) EHS campaigns, such as the commemoration of 'Safety Days', etc.

At **SNOWDESERT (E.A) LTD**, the responsibility for EHS falls on everyone's shoulders, and as such this policy will be communicated to all company personnel.

DIRECTOR.....

SIGN.....DATE.....

1. RESPONSIBILITY FOR IMPLEMENTING THE POLICY

Although responsibility for EHS rests with all personnel, for reasons of efficiency, duties have been assigned as follows.

1.1 Directors

Overall responsibility for EHS lies with the Directors. As such, their responsibilities include:

- I. Establishing the policy at work, and ensuring that the law is complied with.
- II. Continually evaluating the effectiveness of the policy and ensuring that relevant changes are made.
- III. Demonstrating personal involvement in matters of EHS, and maintaining enthusiasm for the same among all employees.
- IV. Ensuring that subordinate responsibility is adequately assigned to meet company requirements.
- V. Ensuring that adequate training and supervision is given to all employees.
- VI. Ensuring that personnel holding management positions are aware of specific requirements for the workplace within their departments.
- VII. Chairing EHS meetings
- VIII. Generating and maintaining enthusiasm for EHS among the employees.

1.2 EHS coordinator

Aside from the duties provided in his Terms of Reference, his responsibilities include:

- I. Familiarizing himself with the company's EHS policy and passing on the information to the employees, in addition to ensuring that it is implemented.
- II. Ensuring that workers are aware of their EHS responsibilities; and that these responsibilities are adequately assigned and accepted
- III. Ensuring that people handling machinery and chemicals are qualified to do so. Their skills and knowledge should be evaluated regularly, and where necessary additional training provided.
- IV. Ensuring that new employees are sufficiently trained and inducted before they can begin work.
- V. Keeping himself informed of changes in legislation pertaining to EHS and passing on this information to other employees.
- VI. Ensuring that visitors to the premises (including contractors) are aware of the company's safety policies and procedures
- VII. ensuring that all employees are familiar with the procedures to be followed in case of emergencies
- VIII. Giving chief consideration to impact on EHS before sanctioning the introduction of new working systems or changing existing ones.

- IX. Attending meetings of the EHS committee
- X. Setting strategies in place for investigation of accidents and 'near misses'
- XI. Compiling relevant statistics and maintaining relevant records.
- XII. Identifying hazards (including equipment and chemicals) in the work environment and communicating to the employees, including modes of handling and storage.
- XIII. Evaluating training needs as identified by the Section managers, and making the necessary recommendations to the directors.
- XIV. Generating and maintaining enthusiasm for EHS among the employees.

1.3 Section Managers

Being in charge of the various sections, they are charged with following:

- I. Familiarizing themselves with the company's EHS policy and actively participating in its implementation.
- II. Ensuring that all the personnel under them are qualified to handle the tasks assigned to them. Their skills and knowledge should be evaluated regularly, and where necessary additional training provided.
- III. Ensuring that high housekeeping standards are maintained in their respective sections.
- IV. Ensuring that all personnel are using issued protective devices constantly and correctly.
- V. Ensuring that adequate supervision and training are provided for the employees.
- VI. Ensuring that new employees are adequately trained and supervised.
- VII. Seeking contributions from the employees and presenting them to senior management at appropriate fora.
- VIII. Identifying dangerous chemicals and other substances and communicating them appropriately, indicating proper usage, storage, precautions and instructions for treatment.
- IX. Ensuring that all employees are familiar with procedures to be followed in case of emergencies.
- X. Maintaining a safe means of entry and egress from the factory at all times.
- XI. Ensuring that all equipment in their sections is in good working condition.
- XII. Participating in the investigation of accidents and 'near misses'
- XIII. Identifying the training needs of employees and forwarding their recommendations to the EHS coordinator. They will also be required to publicly support those undertaking the training.
- XIV. Representing senior management in their sections, and reporting any concerns to them
- XV. Generating and maintaining enthusiasm for EHS among the employees.

1.4 Supervisors

- I. Familiarizing themselves with the company's EHS policy and actively participating in its implementation.
- II. Ensuring that all the personnel under them are qualified to handle the tasks assigned to them.
- III. Ensuring that high housekeeping standards are maintained in their areas.
- IV. Ensuring that all personnel are using issued protective devices constantly and correctly.
- V. Ensuring that adequate supervision and training are provided for the employees.
- VI. Ensuring that new employees are adequately trained and supervised.
- VII. Seeking contributions from the employees and presenting to senior management at appropriate fora.
- VIII. Ensuring that all employees are familiar with procedures to be followed in case of emergencies.
- IX. Ensuring that all equipment in their areas is in good working condition.
- X. Participating in the investigation of accidents and 'near misses'.
- XI. Ensuring that hazards within their areas are identified and communicated clearly.
- XII. Representing senior management in the firm, and reporting any concerns to them
- XIII. Generating and maintaining enthusiasm for EHS among the employees.

1.5 Maintenance (Engineering) personnel

Their duties will include, but will not be limited to:

- I. Making provisions for the periodic examination of facility equipment and the carrying out of preventive maintenance activities
- II. Maintaining up to date records for the equipment
- III. Familiarizing themselves with statutory requirements regarding various plants and implementing them.
- IV. Participating in the investigation of accidents and 'near misses' and providing guidance on mitigation measures.

1.6 Other employees

All employees are required to:

- I. Familiarize themselves with the company's EHS policy and other related guidelines, and adhere to them
- II. Make proper use of any protective equipment issued to them
- III. Carry out their duties in a manner that ensures their own safety and that of their colleagues; following training and information provided.

- IV. Examine their equipment before use to ensure that it is in good and safe working order
- V. Report any deviations from stipulated safety standards (e.g. defective equipment) to a responsible person immediately.
- VI. Only handle machinery and tasks for which they have been authorized
- VII. Maintain high standards of housekeeping at their work stations
- VIII. Report any illness or accident to their supervisors for immediate action.
- IX. Ask for guidance from the supervisor if not sure of anything regarding their work.

1.7 Security personnel

Their chief duty will be to ensure that all visitors to the premises comply with laid down company procedures concerning entry to and departure from the premises.

1.8 Visitors (guests, contractors etc)

Whenever they are on our premises, visitors have a duty to:

- I. Familiarize them with, and observe company guidelines on EHS.
- II. Report to the office and sign the visitors' book
- III. Only move around the premises if accompanied by a member of staff, unless given permission to do so by management
- IV. Inform management when leaving and re-entering the premises

In addition to the above, contractors should:

- V. acquaint themselves with legislation governing them before beginning any work on the premises
- VI. maintain high standards of housekeeping while on the premises
- VII. not undertake any work that poses a risk to others

2. IMPLEMENTATION OF THE EHS POLICY

2.1 ORGANIZATION OF EHS IN THE WORKPLACE

2.1.1 THE EHS COMMITTEE.

The committee shall be collectively responsible for handling any matters pertaining to EHS.

At any one time the committee shall have a minimum of 10 members and shall comprise personnel from the production floor as well as Management.

These will be officially appointed through letters signed by the Director as well as the EHS Coordinator. Their terms of reference shall be set and communicated to them.

As per the guidelines of the Factories and other places of work (Safety and Health Committee) rules, 2004, efforts will be made to ensure that workers representatives are selected by their fellow workers.

The elected personnel shall serve on the committee for a period of three years, after which their terms may be terminated or renewed for an additional three years.

However care will be taken to ensure that they do not serve for more than two terms, in line with the stipulations of the Safety and health committee rules.

The requirements shall not be strictly applied to members of the committee holding manage net positions.

The members of the committee will be officially introduced to the other employees.

2.1.1.1 Meetings

The committee shall meet at least four times a year, as per government requirements.

The frequency of meetings may exceed the stipulated number, as warranted by events on the premises. For instance in the event of a major accident, a meeting will be held within 24 hours of the occurrence. Where this is not possible, it should be held as soon thereafter, as possible.

Prior to each meeting a notice of at least seven days will be issued. A copy of the notice along with the proposed agenda for the meeting will be posted at various locations. This will enable the other employees to give their contributions to members of the committee.

2.1.1.2 Minutes

The secretary of the committee shall keep a clear record of the proceedings of each meeting. Copies of these minutes will be made available to all members of the committee. A summary of the same will be posted at various locations for perusal by other employees.

Employees will be encouraged to discuss these issues and raise their concerns.

2.1.1.3 Training

The members of the committee shall under go comprehensive health and safety training. This will be conducted by personnel approved by the Directorate of Occupational Safety and Services (DOHSS) and shall be in line with the approved curricula.

A detailed record of areas covered shall be maintained for review at regular intervals.

Should any changes be made in the syllabus, arrangements shall be made to apprise those trained.

Based on identified gaps, additional internal and external training programs will be formulated and implemented.

2.1.1.4 Inspections/ audits

The EHS committee shall be responsible for organizing frequent inspections of the premises to monitor EHS performance. The inspections will follow guidelines set down by the committee. At the beginning of each year, a tentative inspection schedule will be set for the whole company. This will be altered as necessitated by events as the year progresses. The number of inspections will however remain the same.

The facility shall be inspected a follows:

- Once in every two months by the EHS coordinator
- Once every quarter by the committee. This will be done in accordance with the requirements of the Safety and Health Committee rules.
- Once a year by an external expert who will be contracted by the company. These shall be Factory Advisors with approved certificates to practice.

These inspections are in addition to those carried out by Government Inspectors.

The findings of all the inspections will be documented by the secretary, and forwarded to the directors. This will be reviewed regularly to monitor progress.

2.1.1.5 Duties of the committee

The committee members will be required to:

- Attend committee meetings
- Conduct inspections of the premises
- Set a good example to their colleagues
- Participate in activities to raise awareness in safety and health in the workplace
- Collect statistics related to health and safety
- Collect information from other workers
- Participate in the training of workers
- Any other duties as may be assigned from time to time.

2.1.2 EHS CAPACITY

In its endeavour to improve in the area of EHS, the company places a great emphasis on capacity. The company's EHS capacity shall include the following:

2.1.2.1 Consultants

To ensure superior EHS performance, the company shall do all in its power to bolster internal EHS capacity. Where this proves inadequate, the management is ready to supplement it with external experts.

2.1.2.2 Special groups

These shall consist of competent members of staff who have received training in certain areas, so as to minimize loss and injury in times of emergency:

- ***First Aid Team***

Every section shall have a sufficient number (as recommended by EHS consultants) of personnel trained in First Aid. These shall undergo yearly refresher courses, to ensure that their training is still applicable. The company aims to have a minimum of 4 trained personnel at any one time.

- ***Fire fighting Team***

Every section shall have a sufficient number (as recommended by EHS consultants) of personnel trained in fire fighting. These shall undergo regular refresher courses, to ensure that their training is still applicable. The company aims to have a minimum of 10 trained personnel.

Care shall be taken to ensure that each shift has a suitable number of these trained persons.

- **Peer Educators**

These will form part of the personnel responsible for steering the HIV/AIDS program mentioned elsewhere in this document.

2.2 COMMUNICATION OF THE POLICY

The company recognizes the importance of employee participation in EHS issues, if set goals are to be attained. To this end, the company has made tremendous efforts to communicate the policy to all personnel. This shall be done in various ways:

2.2.1 Posters

These shall be put up in appropriate locations (e.g. at the points of danger) on the premises. They shall contain a summary of the important points of the policy, in addition to other EHS information.

The posters shall be brief and striking to attract and retain attention.

An enlarged copy of the policy summary shall be hung in a prominent area, where it may be viewed by any visitors to the premises.

2.2.2 Talks

These shall be organized on a regular basis to keep the employees informed of any changes in the area of EHS. The same forum shall serve to gauge the employees' familiarity with the company's policy, and where required; the necessary amends shall be made.

2.2.3 'EHS day's / weeks

A day/ week shall be set aside in the company's calendar, for focus on EHS. Each 'EHS Day/ week' shall focus on a certain EHS aspect. All employees shall participate in the activities organized, and these shall be geared towards creating awareness on the said aspect or theme.

2.2.4 Induction of new employees

All new employees shall be familiarized with the company's policy before commencing work on the premises. The policy will be communicated to them in a variety of ways:

- A summary of the policy will be attached to their employment contract. The contract may not be signed until the employee has demonstrated a satisfactory level of acquaintance with the policy.

- Forums may be organized on the first day of employment to provide brief EHS training for the new employees. At this time, salient features of the EHS policy shall be communicated to them.

3 EMERGENCY PREPAREDNESS

3.1 FIRE

3.1.1 Prevention of fire

All company employees shall receive basic fire training, focusing on the importance of preventing fire. This shall especially target those employees whose tasks pose a fire risk.

3.1.2 Equipment

Adequate Fire fighting equipment shall be provided in various locations and in different forms. This shall be on a maintenance schedule with approved service providers. Whenever service personnels are on our premises they will be accompanied by our Fire Marshall to ensure that satisfactory service is provided.

3.1.3 Training

All employees shall receive basic training on fire fighting. However, a select team shall undergo comprehensive training on the same. This is the team that shall be charged with fighting fire in the event of such an occurrence.

Efforts will be made to conduct refresher training to ensure that their skills are still useful.

The service providers shall also be called upon to conduct demonstrations from time to time.

3.1.4 Procedures

Detailed procedures on fighting fire shall be documented and communicated to all employees. Emergency evacuation procedures shall be documented and posted in appropriate locations within the premises.

All personnel in management shall be required to ensure that the people for whom they are responsible are familiar with the procedure to be followed in the event of a fire.

3.1.5 Exits

All exits shall be kept clear and accessible at all times. It is the responsibility of the people in charge of each area to ensure that this is so. All exits shall be indicated and marked after the fashion laid down in the Factories and other places (Fire risk reduction) rules, 2007.

3.1.6 Drills

Fire drills shall be conducted on a regular basis to determine the level of personnel preparedness for emergencies.

These will be conducted under the guidance of the members of the fire fighting team

3.1.7 Fire fighting team

The fire fighting team shall comprise personnel with comprehensive training. The team will be led by a Fire Marshall.

Specific responsibilities for this team are outlined in our Fire policy.

3.1.8 Fire policy

A policy detailing arrangements for emergencies relating to fire fighting will be prepared. A statement of the same will be posted in various locations.

3.2 MEDICAL EMERGENCIES

To safeguard the health of employees, the facility will engage the services of qualified personnel.

Arrangements for medical emergencies have been made with the nearby Hospitals. Plans are underway to prepare documents that will be issued to our employees to ensure that they receive rapid attention.

Efforts will be made to ensure that vehicles are always available for the transport of personnel from our premises to the designated health facility.

3.3 FIRST AID

3.3.1 Training

There shall be a sufficient number of personnel trained in First Aid on the premises at all times. Their names shall be posted on all the First Aid boxes for easy access by those in need.

Efforts will be made to carry out refresher training for the same.

3.3.2 First Aid equipment

There is one large First Aid boxes on the premises. Efforts will be made to equip this box as per the requirements of the Factories (First Aid) rules.

Regular 'audits' of the kits shall be made to ensure that they are adequately equipped at all times. These will be combined with the inspections to be conducted by the EHS coordinator, mentioned elsewhere in this document.

3.3.3 Records

A concise record of all those who have received attention, along with the nature of their injuries, shall be kept by the persons responsible in each department.

These records will be reviewed and departmental statistics compiled. The same will be forwarded to the EHS coordinator for comprehensive statistic compilation.

3.4 CHEMICAL SPILLAGES

Chemical spills are critical since they pose a danger both to personnel and the environment. They must therefore be handled carefully to minimize damage.

As a first step, all employees handling chemicals will receive training on the precautions to be employed when handling them, as well as the procedures to be followed in the event of spillages.

The Material Safety Data Sheets (MSDS) will be closely consulted in this.

Detailed information has been provided in our Chemical Safety Manual and Emergency Response Plan.

4. WORKPLACE SAFETY, HEALTH AND WELFARE CONDITIONS

4.1 MACHINERY SAFETY

A complete record of all the machinery on the premises will be maintained by the Technical General Manager. The manager will be responsible for ensuring that all personnel handling machinery are conversant with its workings. Only employees authorized to handle specific equipment will be allowed to do so.

He will also be responsible for organizing regular inspections of the equipment to ensure that it is in good and safe working states.

A comprehensive record of the findings of each inspection as well as the maintenance carried out on each piece of equipment will be kept.

A copy of the same will be forwarded to the EHS coordinator.

Detailed procedures for ensuring machinery safety are found in the company's manual on machinery safety.

4.2 PLANT SAFETY

Plants by definition include all pressure vessels and lifting equipment.

The maintenance manager will also be responsible for maintaining an up to date record of all plants on site.

Statutory requirements concerning the same will be taken into account in all operations of the plants.

Detailed procedures for ensuring plant safety are found in the company's manual on plant safety.

4.3 CHEMICAL SAFETY

A comprehensive record of all chemicals in use on the premises shall be maintained.

All employees handling chemicals as part of their daily duties shall undergo detailed training on the procedures to follow in handling and storing the said chemicals. This shall include information on protective equipment used as well as steps to take in case of accidental spillages.

Only employees who have undergone this training shall be allowed to handle chemicals on the premises.

Material Safety Data Sheets (MSDS) for all chemicals shall be made available and consulted regularly.

Arrangements shall also be made to provide containment for the tanks containing chemicals to prevent environmental pollution, in case of spillage.

Further, obsolete PPE from the chemical handlers shall be disposed of on the premises, by burning or burying. The same shall apply to any empty chemical containers. Care shall be taken to ensure that all are accounted for before disposal.

A detailed 'Chemical Safety Manual' shall be maintained on site.

4.4 ELECTRICAL SAFETY

In recognition of the danger posed by electricity, the company shall put measures in place to ensure the safety of all its employees.

Regular inspections shall be made (headed by the Technical General Manager) to check for and replace any worn out electric cables.

At present, some of the measures in place include the following:

- The company has contracted a certified electrician who visits the premises. This way, any faults identified are attended to within the shortest time possible.
- Circuit protection devices (circuit breakers) have also been installed.
- Regular checks have been instituted for various parts of machines as well as the light fixtures.

4.5 HAZARD COMMUNICATION

The company shall have a detailed manual focusing on safety of employees while on the premises. All hazards on the premises will be identified and communicated to personnel in a variety of ways. These will include:

4.5.1 Notices/ posters/ safety signs

These shall be posted at the point of danger, cautioning the employees whenever they approach the area.

4.5.2 Verbal communication

Allocations shall be made within the work schedule to allow for verbal communication of the hazards. This will ensure that all employees are aware of the said hazards.

4.6 ACCIDENTS AND INCIDENTS

All accidents on the premises shall be reported to the responsible persons as soon as they occur. A record of the same shall be made. Steps shall then be taken to investigate the cause of the accident and take measures to ensure that a recurrence is avoided.

'Near misses' shall be given the same degree of seriousness as actual accidents, due to their potential for causing harm. These too shall be reported and recorded as soon as they occur.

An exhaustive account of accidents and procedures to be followed upon their occurrence shall be found in the company's Accident Investigation Procedures.

4.7 PERMITS TO WORK

Dangerous processes requiring permits to work shall be identified and communicated to the employees. Those undertaking these tasks shall be required to obtain the necessary permits before beginning work. Every effort shall be made to ensure that the employees' level of awareness on the safety requirements for dangerous work remains high.

A detailed document ('Permits to work') shall contain information on, and procedures for issuing the permits

4.8 STORAGE

The company's guide on storage ('warehousing') shall contain information on the procedures to be followed in the stores/ warehouses. This information covers areas such as: goods to be stored here, mode of storage, guidelines to be followed in handling, record keeping, stacking heights and transportation to, within and from these areas, among others.

4.9 INFORMATION SYSTEMS

All information provided shall be in a language that may be understood by all personnel.

4.9.1 Operation manuals

Operational manuals for specific machines shall be made available to their operators. This will help to answer questions they may have on the mechanisms, from time to time.

Summarized versions of the same will be posted at or near the machines in question.

4.9.2 Safe working procedures (SWP)

These shall be posted on or near all machines. They shall contain detailed instructions on safety precautions to be taken in the operation of the equipment in question. The same may be incorporated in the operational manuals.

4.9.3 Material safety data sheets (MSDS)

A record of all hazardous substances used on the premises shall be maintained. MSDS for all these shall be made available at the workplace. Further information on the handling of chemicals may be found in the company's 'chemical safety manual'.

4.10 CONTRACTORS AND SUPPLIERS

Contractors and suppliers shall be required to demonstrate a willingness to comply with the company's EHS policy before they can be allowed to transact any business with the company.

Where necessary, the contractor may be required to have his own safety policy, outlining measures taken to ensure his own, as well as the safety of those on the premises on which he is working.

Comprehensive information on this and other guidelines governing the conduct of contractors and suppliers while on our premises may be found in the document 'Contractor Procedures'.

5. OCCUPATIONAL HEALTH AND HYGIENE CONDITIONS

5.1 PERSONAL PROTECTIVE EQUIPMENT (PPE)

The company recognizes the importance of protecting employees as they work. To this end, all employees shall be issued with PPE that is suitable and adequate for the tasks assigned to them. This shall be replaced frequently to ensure that the employees are well protected as they go about their duties. The PPE shall be issued by the Storekeeper, who shall maintain a clear record. Each employee shall be responsible for the PPE issued to him/ her.

Additionally, they shall receive training on the use of the same, before starting work. Employees are encouraged to use their PPE at all times.

More information on PPE is found in the document bearing the same name.

5.2 VENTILATION

Adequate ventilation shall be provided in all working areas. Efforts shall be made as far as possible to ensure that natural ventilation is sufficient. Where this proves impossible, artificial means shall be provided to supplement it.

A clear record of areas served by the two types of ventilation (artificial and natural) shall be maintained by maintenance personnel. Regular checks shall be carried out to ensure that the ventilation in all areas is adequate for the processes being carried on in those areas.

5.3 LIGHTING

Adequate lighting shall be provided in all working areas. Efforts shall be made as far as possible to ensure that natural lighting is sufficient. Where this proves impossible, artificial means shall be provided to supplement it.

A clear record of areas served by the two types of lighting (artificial and natural) shall be maintained by maintenance personnel. Regular checks shall be carried out to ensure that the lighting in all areas is adequate for the processes being carried on in those areas. Defective light fixtures shall be replaced as soon as they are discovered.

Employees are encouraged to report them to responsible persons whenever they notice this.

5.4 OVERCROWDING

The management shall ensure that the amount of space provided for each employee is adequate as stipulated by the act. A layout of the plans on which the distribution of machines is indicated, shall be maintained in the records. Information on the heights of various workstations shall also be recorded.

Measures shall be taken to ensure that adjustments made do not reduce the work space of any employee.

5.5 HOUSEKEEPING

Seeing as housekeeping is a key aspect of EHS, the company strives to maintain high standards in this area.

All employees shall be encouraged to maintain the same standards at their workstations.

The management shall ensure that the buildings on its premises are in good condition at all times. Regular inspections and maintenance shall be carried out.

There shall be documented procedures detailing:

- Frequency, responsibility and mode of cleaning and painting of various surfaces on the premises
- Maintenance of the state of passageways on the premises, including markings
- Guidelines for storage of (raw and packaging) materials, finished goods etc in relation to clearance from ceilings, free access etc
- Facilities for containment of waste and finished products

Further information on this is found in the 'Housekeeping manual'.

5.6 HANDLING OF MATERIALS

The company shall document and communicate to the relevant persons, procedures (including safety measure in place) for handling and transporting various materials within the premises.

5.7 NOISE

The company shall document a 'Noise Control and Prevention' program, to be enforced for the benefit of the employees.

The noise levels of various sections of the facilities shall be determined and recorded. Based on these findings:

- All areas of the company where the noise generated may pose a danger to the employees shall be identified and communicated.
- Suitable PPE shall be provided to those working in these areas. Anyone entering the said areas shall also be required to use it.
- Training shall be provided to convey the importance of taking precautions while working in these areas.
- Employees in these areas shall undergo the applicable medical examinations
- Appropriate measures shall be taken to determine whether a reduction in the levels is achievable, either through modification of machinery or other practical means.
- Alternative emergency warning systems may be introduced in areas with high levels of noise.

5.8 THERMAL CONDITIONS

The company shall put measures in place to protect personnel working in conditions with extreme temperatures. These are areas that may be hotter or cooler than average.

All areas with extremes of temperatures shall be identified and records kept. Areas with high levels of humidity shall also be noted.

Based on the findings:

- Protective measures including the issuing of special PPE shall be instituted for those working in these areas.
- Training shall be provided to enable them to understand their environment and the precautions to be taken
- Measures shall be taken to determine whether the temperatures may be altered without affecting the processes generating or demanding them.
- The affected workers shall undergo applicable medical examinations.

5.9 MEDICAL EXAMINATIONS

Being aware of the importance of monitoring employee health, the company shall make arrangements to have the employees examined regularly, as stipulated in the 'Medical Examinations Rules' (Legal Notice 24 of 2005). The examinations undergone by different employees shall be influenced by their areas of work. A breakdown of the examinations to be undergone by different employees may be found in the document titled 'Employee Medical Examinations'.

5.10 WELFARE FACILITIES

The company shall demonstrate its concern for the employees' well being through its provision of various facilities to make them as comfortable as possible whenever they are on the premises. Such provisions shall include:

5.10.1 Sanitary conveniences

Separate and adequate conveniences shall be provided for the male and female employees. This shall be maintained in a clean manner at all times. Additional conveniences shall be provided in the facilities for female employees by companies contracted by the management.

5.10.2 Washing facilities

These shall be provided at various points on the premises in the form of taps and sinks.

5.10.3 Drinking water

Arrangements shall be made to avail wholesome drinking water for use by the employees. This will be achieved by treating the water on the premises using approved water purifiers. Clean cups will be provided at the watering points. These will be cleaned at regular intervals by kitchen staff.

5.10.4 Accommodation for clothing

Individual and lockable accommodation shall be provided for keeping clothing not worn during working hours.

5.10.5 Sitting facilities

Sitting facilities have been provided for the employees while at work.

6. ENVIRONMENTAL CONSIDERATIONS

6.1 WASTE

With respect to the natural environment, this may be the most critical area of the policy.

As with any industrial processes, our facility generates both solid and liquid waste.

The company shall have a documented 'Waste Management program that supplies details concerning the handling of waste generated on the premises.

Recycling is a big part of the company's environmental ethic.

6.1.1 Solid waste

It is the company's policy to quantify all solid waste generated. This makes tracking possible. Waste generated shall be segregated according to various categories detailed in the waste management program. The various kinds shall be weighed and the quantities recorded. They shall then be prepared for various methods of disposal.

6.1.2 Liquid waste

Effluent shall be analyzed and the results measured against stipulated government standards. Appropriate steps shall be taken to comply with these standards, and where possible surpass them.

Parameters analyzed and mode of analysis may be found in the company's 'waste management' program.

6.2 UTILITIES

The company shall put measures in place to track usage of various utilities on the premises. This shall help in preventing losses. Detailed information may be found in the company's Utility Conservation Program.

6.2.1 Electricity

Meter readings shall be taken regularly from all the electricity meters located on the premises. From this, approximate quantities used shall be determined. Deviations may therefore be noticed and rectified/ explained.

6.2.2 Water

Readings are taken to monitor usage of water from the Nairobi Water and Sewerage Company. The company also buys water to supplement when there is shortage.

6.2.3 Other fuels

Quantities purchased shall be closely monitored. Where changes are noted, efforts shall be made to explain and/ or rectify them.

6.3 STORAGE TANKS

The company shall have a documented 'Storage Tank Manual' containing detailed

Information on our storage tanks (Both underground and 'above ground').

The manual shall give information on procedures to be followed in case of spills.

Other information shall focus on the design, labeling, maintenance and fire prevention, among others.

7. PERFORMANCE MONITORING

Any system set in place to attain certain objectives must be tested from time to time to ensure its effectiveness.

7.1 Accident records

All accidents and near misses occurring on our premises shall be recorded. Over time this records shall be reviewed and compared with those from similar periods of time to analyze the trend. This will enable the company to monitor its performance in this area.

7.2 Occupational illness

Records of work related illnesses shall also be maintained. As with the accident records, these shall be reviewed over time to give an indication of the company's performance.

7.3 Effluent analysis

Comparison of our results with stipulated government standards will help us to map the trend our effluent is following.

7.4 Solid waste

As stated elsewhere in this document, a careful record of the kinds and quantities of waste generated shall be kept. Comparison of past and present quantities shall present a clear picture of our pattern in this area.

7.5 Fire drills

Fire drills shall serve as an indicator of our preparedness for emergencies of this nature. A key issue here shall be the time taken by our employees to respond to the alarm. An evaluation of the 'times' taken, as evidenced by meticulous records shall go a long way in helping us to gauge our performance in this area.

7.6 Training

Training our employees shall equip them well for the EHS tasks assigned to them. Records of those trained and the course content shall allow us to know where we are, as far as EHS knowledge goes. We can then identify our shortcomings and deal with them appropriately.

7.7 Inspections/ audits (both by consultants and government personnel)

Perhaps the most powerful tool, inspections/ audits shall take a critical look at our overall EHS performance. Review of past and current reports will illustrate strides made, as well as nonconforming areas.

8. DISCIPLINARY ACTION

The importance of compliance to the policy cannot be overstressed. For this reason the company shall institute measures to be taken against those who do not fulfill their EHS obligations.

The severity of the action will depend on the gravity of the wrong. Those whose actions endanger the lives of others shall face an especially stiff penalty.

The penalties will range from admonishment to dismissal.

Details of the same are found in the company's guide on 'EHS Disciplinary Measures'.

9. HIV/AIDS

In recognition of the devastating effects of the HIV/AIDS pandemic on the active members of our society, the company has developed an HIV/ AIDS policy.

The company will also play its part in assisting the government in implementing any relevant programs in the workplace.

Aspects covered in this policy include the following:

9.1 Training

Efforts will be made to provide relevant training to all members of staff.

Suitably qualified persons will be contracted to undertake this.

Personnel will be encouraged to share this information with others.

9.2 Awareness

The facility will participate actively in the creation of awareness. This will be achieved through the provision of written materials, running of campaigns and talks.

9.3 Discrimination

It is the company's policy that no person shall be discriminated against on the basis of their HIV/AIDS status, should they choose to disclose it. Their wages will not be affected.

9.4 Special Groups

A select number of personnel will be given additional training that will enable to steer the company's HIV/AIDS program. These will serve as peer educators and will be responsible for, among other duties, imparting knowledge to the rest of the employees.

9.5 Counseling

From time to time, the services of qualified counseling personnel will be provided for the personnel, to have their questions answered.

9.6 Global scene

The company will keep abreast with any developments relating to HIV/AIDS. The world AIDS day will be commemorated on our premises. Various activities will be carried out on this day.

HIV/AIDS POLICY STATEMENT

Our goal in this area is to ensure that all employees are equipped with necessary information on the pandemic. We aim to provide education not only for them, but through them, for the community at large.

In the fight against HIV/AIDS, we at **SNOWDESERT (E.A) LTD** are committed to:

- I. Developing a comprehensive HIV/AIDS policy and personnel to steer the program.
- II. Participating in national and global initiatives to fight the pandemic.
- III. Providing forums where personnel can get pertinent information. This will be achieved through the organization of seminars and other training programs.
- IV. Protecting the privacy of personnel in as far as their status is concerned: personnel will not be asked to disclose their HIV/AIDS status.
- V. Ensuring that no one is discriminated against on the basis of their status, should they choose to disclose it.
- VI. Creating awareness on the pandemic. This will be achieved through campaigns, talks, written material etc.
- VII. Involving all employees in relevant programs and the attainment of stipulated goals.
- VIII. Facilitating the formation of relevant support groups.
- IX. Encouraging all employees to know their status.
- X. Allocating resources for the development of programs.
- XI. Participating in national (and worldwide) campaigns, such as the commemoration of the World AIDS Day.

DIRECTOR.....

SIGN..... DATE.....

10. DRUG AND ALCOHOL ABUSE

The abuse of drugs and alcohol has been responsible for ruining many lives. Indeed excessive consumption of alcohol has been credited with a myriad of ailments, often resulting in death.

In the workplace, many serious (some fatal) accidents have been caused by personnel operating equipment while under the influence of these substances. Such persons are also often difficult to work with, creating strained working relationships. At the very least, this may affect the efficiency of any firm's operations.

The company places a great emphasis on this subject due to its potential for harm, both at a personal and professional level.

A Drug and Alcohol Abuse Policy will be developed and communicated to all personnel. Aspects covered will include:

10.1 Working while intoxicated

At SNOWDESERT (E.A) LTD no personnel will be allowed to undertake their duties once it has been confirmed that they are under the influence of one or more of the substances in question.

Supervisors will be relied upon to identify such persons.

Action to be taken will be detailed in the policy.

10.2 Drugs and Alcohol on the premises

SNOWDESERT (E.A) LTD will strive to remain an Alcohol and Drug Free Zone. The presence of the said substances on our premise is strictly prohibited.

10.3 Scope

A comprehensive list of substances covered by the policy will be provided therein.

The list will be updated regularly to accommodate any changes.

10.4 Training

The company will make every effort to equip personnel with all the relevant information. Arrangements will be made with suitably qualified persons to provide training for staff.

Additional training will be provided for supervisors to equip with skills necessary for the accurate identification of inebriated personnel.

They will also receive training on the appropriate way of handling such persons.

10.4 Support

Abuse of alcohol and other substances is usually an indication of an underlying problem. Attempts will be made to provide assistance for persons needing it. Such persons must however express an interest in the said assistance. The policy contains information on the forms of assistance that will be availed.

10.5 Awareness

Various campaigns will be run to create awareness on the issue. Different means of communication will be used. Additional information on this is found in the policy document.

10.6 Support groups

The company will facilitate the formation of relevant support groups for the discussion of matters pertaining to this subject. Should this not be possible, efforts will be made to locate suitable alternatives.

10.7 Government agencies

SNOWDESERT (E.A) LTD will liaise with relevant government agencies, key among which is NACADA for the attainment of set goals.

DRUG AND ALCOHOL ABUSE POLICY STATEMENT

SNOWDESERT (E.A) LTD premises are a 'DRUG-FREE ZONE'. To maintain this status, we are committed to:

- I. Ensuring that no personnel are allowed to undertake any duties while under the influence of drugs or alcohol.
- II. Prohibiting the consumption of alcohol or drugs on our premises.
- III. Working closely with relevant government agencies for the attainment of desired goals in this area.
- IV. Running campaigns with the aim of creating awareness.
- V. Providing training on the effects of the controlled substances
- VI. Developing a comprehensive Drug and Alcohol Abuse policy
- VII. Doing all within our power to provide assistance for persons requiring it
- VIII. Facilitating the formation of relevant support groups
- IX. Participating in national (and worldwide) campaigns.

DIRECTOR.....

SIGN.....

DATE.....

11. REVIEW OF THE POLICY

This policy shall be reviewed periodically to accommodate any changes. To facilitate this, there shall be a procedure in place to track any changes in the processes, equipment or materials.

Other factors warranting a review of this document will include:

- Change in legislation
- New information received
- Failures within the EHS management system

At present the review period has been set at every four years. This is subject to change with the passage of time.

The overall responsibility for ensuring that the policy is reviewed rests with the Director and the EHS Coordinator.