



# Health, Safety and Environmental Management System

North America



# HSE Policy Statement

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It is Airswift's policy to always provide and maintain a safe and healthy work environment. The wellbeing of everyone we work with - physical, psychological, and social - drives the way we operate and the commitments we make.

The goal of Airswift management is to prevent occupational accidents, injuries and illnesses and this will be achieved by management, for whom the protection of the health and safety of every employee is above any other consideration of job operation or administration. The ultimate goal of Airswift at every level of our organization shall be to ensure at all times, throughout every phase of job operation, the health and safety of our own employees, the client employees and the employees of every subcontractor.

Airswift recognizes that the responsibility for employee safety and health requires constant and continuing efforts of a partnership of company management, its employees, sub-contractors and their employees, the client and their employees.

Airswift accepts its responsibility to lead in the promotion and practice of its health and safety program.

Airswift shall comply strictly with all legally mandatory and generally accepted work practices and procedures for the protection and promotion of health and safety of its employees and others, who may be affected by the company's activities, and shall strictly adhere to all site safety and health standards and job work rules and practices. Employees at all levels shall work conscientiously and diligently to execute the company's health and safety policy of maintaining the highest standards of occupational health and safety to prevent human suffering and losses, which result from unsafe practices.

Airswift shall promote and enforce the development, dissemination, implementation, effectiveness and improvement of its health and safety program. Airswift shall pursue a HSE strategy to achieve the company's goal to prevent human suffering and to limit losses by leadership in the prevention of accidents, injuries and illness.

Airswift HSE Policy emphasizes that every employee and official of the company is unreservedly committed to achieving our ultimate HSE target, which is Zero Accidents, Zero Incidents and Less Pollution and Minimum Waste.

Airswift shall emphasize the Stop Work Authority to all staff and contract employees. No employees shall return to work until all unsafe issues and concerns have been addressed and resolved.

A handwritten signature in blue ink that reads "Sam Cross".

Sam Cross

Senior Vice President - North America

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# 1.0 Scope

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This HSE Management System explains how the expectations in the HSE Policy are understood, effectively communicated and implemented in practice. The SVP - North America is required via the HSE Policy to establish core processes and procedures necessary to achieve conformance with the HSE Policy and compliance with applicable HSE US laws and regulations. The Policy is applied to all operations and activities that Airswift Technical Services LLC (hereafter referred to as Airswift) undertakes, including departmental and project management, manpower services and any other services the company renders.

This HSE Management System is organized to achieve compliance with applicable US laws and regulations while permitting flexibility to individual client and contract needs. HSE requirements are normally included for each client contract and define the HSE Management System elements specifically determined for implementation to individual clients or projects. Airswift is a recruitment consultancy company and its permanent employees undertake low-risk office-based duties only. Temporary contract employees are hired on an as-needed basis per client requirements and may work in office based or site based assignments or a combination of both.

This HSE Management System applies to all personnel working for and on behalf of Airswift regardless of their location in the North America Business Unit.

Hard copies of this HSE Management System will be held by the SVP - North America and senior management, and the Operations Manager - North America. A public copy will be located in each Airswift office on general display for employee reference.

Airswift HSE Policy visibility will be mandatory with at least one framed, letter-sized hard copy of the policy mounted in each Airswift office on general display for employee and visitor reference.

## 2.0 Definitions and References

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### 2.1 DEFINITIONS

- 2.1.1 **Client:** Individual or organization formally contracted with Airswift requiring specific services to be performed by Airswift.
- 2.1.2 **OSHA:** A US Federal agency created under the Occupational Health and Safety Act of 1970. The agency regulates and enforces the standards developed under the Act (29 CFR series) and assists businesses and individuals in improving conditions in the workplace.
- 2.1.3 **Airswift Client Service Manager:** The Airswift primary point of contact with a specific Airswift client, acting as a formal interface between client and Airswift.
- 2.1.4 **Medical Fitness for Work:** The verified process to ascertain that an employee is medically fit to work in a specified job role without limitations or with limitations.
- 2.1.5 **Subcontractor:** Sub-contractors are small specialist companies that use Airswift's client master service agreements to provide services.



## 3.0 Process 1 - General Requirements

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### 3.1 MANAGEMENT REVIEW AND CHANGE

Airswift senior management will review and evaluate this HSE Management System:

- On an annual basis;
- When changes occur to OSHA Standards Series 29 CFR that prompt a revision;
- When changes occur to any related US HSE law or regulation that prompts a revision;
- When Airswift operational changes occur that require a revision;
- When client operational changes occur that require a specific client amendment to the HSE exhibits in the client / Airswift contract and may conflict with the minimum expectations in this document.

### 3.2 ROUTINE HEALTH AND SAFETY INSPECTIONS

Routine safety and health inspections of all Airswift offices shall be conducted at least bi-annually. Violations shall be addressed by the SVP - North America and senior management at the same level of disciplinary action as other violations.

The inspection team will comprise at least two members including at least one member of senior management. Hazards will be classified according to the following rating system:

- **Priority Hazard Red:** The most serious type of unsafe condition or unsafe work practice that could cause loss of life, permanent disability, the loss of a body part (amputation or crippling injury) [potential OSHA recordable injury], or extensive property damage
- **Priority Hazard Orange:** Unsafe condition or work practices that could cause serious injury, industrial illness [potential OSHA recordable injury], or disruptive property damage
- **Priority Hazard Yellow:** Minor condition, a housekeeping item or unsafe work practice infraction with little likelihood of injury or illness other than perhaps a first-aid case. May cause non-disruptive property damage.

## 3.0 Process 1 - General Requirements

The following inspection elements will be checked during these inspections:

<u>Element</u>	<u>Criteria</u>
Floors	General condition, obstructions
Aisles	General condition, obstructions
Stairs	General condition, railings, obstructions, lighting, free access
Lighting	Suitable Illumination for work, emergency lighting
Exits	Obstructions, un-locked, illuminated
Ventilation	Adequate, fans guarded, maintained, temperature
Chemicals	SDS's, labels, storage, seperated
Fire protection	Extinguisher condition, type, locations
First Aid	Kits, OSHA 300 logs
Waste disposal	Containers, labeled, seperated
HSE Policy	Visible in the office

An office workplace inspection checklist will be used to record the inspection. The report will be distributed immediately to Operations Manager responsible for correcting deficiencies noted during the inspection. Senior management will use the hazard classification system to prioritize deficiency correction. The report will be distributed to all relevant supervisors and senior management personnel to brief employees under their control where necessary. The Operations Manager will develop Job Hazard Nalaysis to determine job roles / areas that have a high incidence of injury potential. These areas will be emphasized during inspections and meetings.

### 3.3 STOP WORK AUTHORITY

All Airswift employees and contract employees working for Airswift have the right and obligation to stop individual tasks or group operations when a condition exists that could result in "Imminent Risk or Danger" to any employee(s) or where there could be an impact to the environment. Additionally, all employees are empowered with "Stop Work Authority" when the job steps and/or job hazards are not clearly defined, recognized or understood. The core principles of Airswift's Stop Work Authority Policy are as follows:

All Employees shall have the authority and responsibility to stop any task or operation where there are concerns or questions regarding the health and safety of an employee, potential for loss or a potential impact to the environment.

No work shall continue until all stop work issues and concerns have been effectively addressed.

Any form of retribution or intimidation directed at any Airswift employees or contract employees working for Airswift for exercising their authority as outlined in this program will not be tolerated.

## 4.0 Process 2 - HSE Communication

Proactive involvement by all employees is essential in delivering the expectations in the HSE Policy. Open and transparent communication of HSE expectations, specific HSE requirements and implementation of HSE processes.

### 4.1 HSE COMMITTEE

The HSE Committee will be comprised of:

<u>Title</u>	<u>Member</u>
Chairman	SVP - North America or a designate
Member	Operations Manager - North America
Other Members	Employee volunteers or nominated by senior management to attend

The principal responsibilities of the HSE committee will be as follows:

- Assemble on a monthly basis to conduct meetings with a pre-agreed agenda
- Review accident, injury, and safety violation reports and discuss corrective actions
- Maintain appropriate records of HSE activities

The Operations Manager - North America will be present to make notations of the meeting and offer advice. This person will track open safety items to conclusion and will also act as chairman in the absence of the SVP.

The committee will aim to encourage HSE awareness among all employees and direct itself openly in conformance to its Charter:

- To place the personal safety and health of each employee in a position of primary importance
- To aid the company in administering the HSE Management System and in complying with all applicable U.S. HSE laws and regulations
- To prevent occupational injuries in the workplace
- To monitor safety performance
- To inspect conditions in the workplace and act on identified hazards and violations
- To ensure that no employee is exposed to unnecessary or involuntary HSE risk in the workplace
- To the greatest extent possible, aid management in providing all physical and procedural safeguards required for personal safety and health in compliance with applicable US HSE laws and regulations and accepted good practice.
- To establish a proactive HSE culture across Airswift that creates and encourages desired individual and group behaviors towards injury and illness.
- To provide minimum HSE requirements to Airswift Client Service Managers for assignment of contracted employees for alignment with clients' own HSE Management Systems. The alignment will compare the Airswift and client's HSE management systems and the higher standard will apply to the contract and any Airswift employees assigned to the client.



## 4.0 Process 2 - HSE Communication

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### 4.2 TEAM MEETINGS

Staff meetings will include HSE content as required to brief staff on changes to any elements of this HSE Management System, HSE requirements or expectations, implementation of processes and procedures, and to discuss any incidents within the company or relevant to its employees. These meetings will be open and transparent and will be recorded on minutes for distribution to all attendees and other interested parties afterwards. Attendees will be encouraged to present and discuss an HSE Moment at the start of the meeting. Employees can also report any safety hazards at this time without reprimand or reprisal through a safety suggestion box, or they can anonymously submit reports of hazards to the Operations Manager - North America.

### 4.3 HSE EXPECTATIONS AND SPECIFIC CONTRACT HSE REQUIREMENTS

Permanent new hires will receive a new hire induction which will include a briefing of this HSE Management System and any other HSE elements applicable to their role. This training will be recorded on the HSE Training Matrix as a record of their attendance.

HSE Expectations and Specific Contract HSE Requirements (HSE Exhibits) will be appended to the contract of all contracted employees. Prior to mobilization to their assigned workplace the contracted employee will be briefed by their assigned Airswift Client Service Manager in the Airswift general HSE expectations and Specific Contract HSE Requirements and will be invited to ask any necessary clarification questions. The contracted employee's acceptance signature in their work agreement will confirm their understanding and acceptance of the HSE Expectations and Specific Contract HSE Requirements.

The HSE Training Matrix will be used to plan and monitor delivery of HSE training across all Airswift employees. The Matrix will align employee's job role against required HSE training needs to demonstrate HSE competencies. The Matrix also tracks qualification validity periods. Prior to qualifications expiring; a decision will be made by senior management and the Operations Manager - North America of what refresher or other HSE training should be provided.



## 5.0 Process 3 - Incident Investigation and Reporting

### 5.1 INVESTIGATIONS

Incident investigation is primarily a fact-finding process. The revealed facts are used to prevent recurrence of similar incidents in the future. Airswift senior management will investigate openly and transparently alongside clients and Federal and/or State authorities as necessary to fully investigate any incident involving any Airswift employee or property. Where clients, Federal or State authorities are mandatorily required to lead the investigation; Airswift senior management and other employees will support the investigation to the fullest extent possible.

Immediate concerns after the incident are:

1. Ensure any injured person receives proper care;
2. SVP - North America or nominated senior manager to decide if any immediate work stoppage is required to temporarily prevent immediate co-workers and other Airswift employees working with similar equipment or in similar job roles being exposed to the same hazard until the investigation is complete and causes are fully understood;
3. SVP - North America or nominated senior management representative to communicate the incident to all Federal and State authorities including police, OSHA, department of Labor etc.;

**NOTE:** Within 8 hours after the occurrence of an employment accident which is fatal to one or more employees or which results in hospitalization of three or more employees, Airswift shall report the accident either orally or in writing to the nearest office of the SVP - North America of the Occupational Safety and Health Administration, U.S. Department of Labor. The report shall relate the circumstances of the accident, the number of fatalities, and the extent of any injuries.

4. SVP - North America or nominated senior management representative to communicate the incident to all employees as necessary. Communication to be approved by the SVP - North America and avoid speculation and be factual only;

5. SVP - North America or nominated senior manager to communicate the incident to any media sources as necessary depending on the scale of the incident to Airswift employees, property or reputation. Communication to be approved by the SVP - North America and avoid speculation and be factual only; and
6. Start the investigation promptly

### 5.7 INVESTIGATION TEAM

For OSHA recordable incidents and any other incident to Airswift property or reputation deemed serious enough by the SVP - North America; Airswift senior management will lead an investigation into the incident. The Airswift accident investigation team will be composed of the following:

<b>Title</b>	<b>Member</b>
Chairman	SVP - North America or a designate
Member	Operations Manager - North America
Other Members	Employee volunteers or nominated by senior management to attend

Where the incident occurs on a client's work site during an assigned employee's working time; the incident will be regarded as OSHA recordable to the client under OSHA Multi-Employer Worksite Rules [OSHA Multi-Employer Citation Policy, CPL 2-00.124, December 10, 1999]. The Airswift Incident investigation team will agree with the client an appropriate form for the investigation and make-up of the investigation team on a case by case basis.

The Incident Investigation Form provides specific requirements for investigation to gather data to determine causes and corrective actions.

All incident investigation reports will be completed by the SVP - North America or Operations Manager - North America and will as a minimum be reviewed by the Airswift Operations Director in London, United Kingdom to ensure pertinent information is transmitted to all concerned across the Airswift Group and remedial action taken corporately where necessary. For incidents deemed serious enough by the SVP - North America; the Airswift Group CEO and where necessary Airswift board members will also be notified of the incident and may contribute to the investigation and follow-up.

## 6.0 Process 4 - HSE Record Keeping

Airswift will comply with the provisions of 29 CFR 1904, Recording and Reporting Occupational Injuries and Illness Standard. Records will be maintained on a calendar year basis.

Airswift will use the criteria of 29 CFR 1904.7-12 Standard to determine recordability for work related fatalities, injuries and illnesses.

Airswift will keep records of fatalities, injuries, and illnesses and will record each fatality, injury and illness that:

- Is work-related; and
- Is a new case; and
- Meets one or more of the general recording criteria.

Airswift will maintain a log of occupational injuries and illnesses under 29 CFR 1904.29 Standard and will make reports under 29 CFR 1904.42 Standard upon being notified in writing by the Bureau of Labor Statistics that the employer has been selected to participate in a statistical survey of occupational injuries and illnesses. Airswift will:

Maintain an accurate OSHA log and summary of all recordable occupational injuries and illnesses.

- Enter each recordable injury and illness on the Log of Occupational Injuries and Illnesses (OSHA 300) and supplementary record (OSHA 301) as early as practicable but no later than seven (7) calendar days after receiving information that an OSHA recordable injury or illness has occurred.

Workmen's compensation, insurance, or other reports will be acceptable alternative records if they contain the information required by OSHA No. 301.

Airswift senior management will post a public copy of its annual summary of occupational injuries and illnesses in each Airswift office on general display for employee reference as required under 29 CFR 1904.32 Standard. This summary shall consist of a copy of the year's totals presented on a copy of the annual OSHA 300 log. If no injuries or illnesses occurred in the year, zeros will be entered on the total line, and the form posted. The summary will be completed and posted by February 1 of each calendar year and shall remain in place until at least April 30. The SVP - North America shall certify on the log that the annual summary of occupational injuries and illnesses is true and complete.

Records provided for in 29 CFR 1904.4 - 1904.12 (including OSHA No. 300 and OSHA No. 301) will be retained for five (5) years following the end of the year to which they relate.

Airswift will provide, upon request, records provided for in 29 CFR 1904.4 - 1904.12, for inspection and copying by any representative of the Secretary of Labor for the purpose of carrying out the provisions of the OSHA 1910.1020 Access to Employee Exposure and Medical Records Standard, and by representatives of the Secretary of Health, Education, and Welfare.

The OSHA No. 300 log and summary of all recordable occupational injuries and illnesses will, upon request, be made available to any employee, former employee, and to their representatives for examination and copying in a reasonable manner and at reasonable times.

Should Airswift change ownership or be wound-up, the company shall preserve all HSE records which are required to be kept.

## 7.0 Process 5 - Disciplinary Action for Unsafe Behaviors

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The willful commitment of an unsafe act will not be tolerated by Airswift senior management. Examples of safety violations include not following verbal or written safety procedures, guidelines or rules, horse play, failure to wear or abuse of selected PPE, and substance abuse among others. Employees who willfully jeopardize their own or co-workers safety will be disciplined. The type of discipline can range from a verbal warning to dismissal per the Airswift Disciplinary Procedure. The Operations Manager - North America will advise the SVP - North America and senior management on the seriousness of any employee procedural or operational infraction and will agree the appropriate discipline.

### 7.1 FORMS OF DISCIPLINE

- 7.1.1 Verbal warning: The Operations Manager - North America, SVP - North America and senior management may give employees a verbal warning for a known unsafe act or procedural infraction.
- 7.1.2 Written warning: A written warning will be issued automatically for a second verbal warning for an unsafe act. The written warning will be added to the employee's permanent HR record.
- 7.1.3 Retraining: Lack of proper HSE training may be a cause of unsafe acts. Senior management will review the need for employee remedial training per the HSE Training Matrix to enable them to better accomplish their job roles with the desired HSE behaviors.
- 7.1.4 Dismissal hearing: per the Airswift Disciplinary Procedure.

### 7.2 UNSAFE ACT PRIORITY CLASSIFICATION SYSTEM

Unsafe acts will be rated according to the following rating system. While any unsafe act is not tolerated; this classification system will be used by senior management to gauge the severity of an unsafe act for use in determining the appropriate level of disciplinary action.

- 7.2.1 **Priority 1 Unsafe Act:** The most serious type of unsafe act or unsafe work practice that could cause loss of life, permanent disability, the loss of a body part (amputation or crippling injury) [potential OSHA recordable injury], or extensive loss of structure, equipment, or material.
- 7.2.2 **Priority 2 Unsafe Act:** Unsafe act or work practice that could cause serious injury [potential OSHA recordable injury], industrial illness, or disruptive property damage.
- 7.2.3 **Priority 3 Unsafe Act:** Minor unsafe work practice infraction with little likelihood of injury or illness, or non-disruptive property damage

All unsafe acts/safety violations shall result in the employee(s) reviewing the infraction with their supervisor and the proper HSE training, or retraining, given to prevent re-occurrence.



## 8.0 Process 6 - HSE Training

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HSE training shall be arranged, provided and refreshed according to an HSE Training Matrix; organized per employee name and job role. Each job role shall list the minimum requirements to perform the duties listed for that particular position, and documentation shall be collected prior to mobilization to verify the employee meets the qualifications. Elements of HSE training will be core and shall be mandatory for all employees. Other non-core HSE training will only be required for specific job roles. HSE training will be regarded as a work assignment and will be monitored as a performance requirement for employees and their supervisors. Allowing training dates to lapse, certifications to expire or non-attendance at pre-arranged training may be regarded as a disciplinary offence by senior management.

Airswift will arrange some of the training through various contracts with qualified/certified providers and some may be provided by clients or other third parties for assigned employees. Regardless of the provider; all received HSE training shall be recorded on the HSE Training Matrix. Formal training certificates issued by providers will be filed in the employee's HR file or some other suitable record.

Critical HSE training shall be provided per the HSE Training Matrix prior to employees taking on the full responsibilities of permanent roles and, where required, prior to mobilization to clients' assignments per Site Entry Requirements, Section 11.0. Further training will be arranged as dictated by the job role requirements of the HSE Training Matrix and when training opportunities arise.

Where there is a change in assigned duties the HSE Training Matrix will be reviewed for any additional training required and its criticality.





# 9.0 Process 7 - Emergency Preparedness and Response

Unexpected events can occur at any time. Airswift shall place the welfare of all employees above all other business drivers and shall work with clients and Federal and State authorities to provide for Airswift employees in an emergency.

## Airswift Houston Office Address

3050 Post Oak Boulevard  
Suite 1450  
Houston, Texas 77056

## 9.1 EMERGENCY CONTACT DETAILS

### Primary Contact

Sam Cross, SVP - North America

Office  
(Business Hours Only) +1 (832) 573 9015

Mobile  
(24 hours) +1 (832) 573 9015

### Alternative Primary Contact

Courtney Rife, HR & Contractor Support Director  
- Houston, Texas

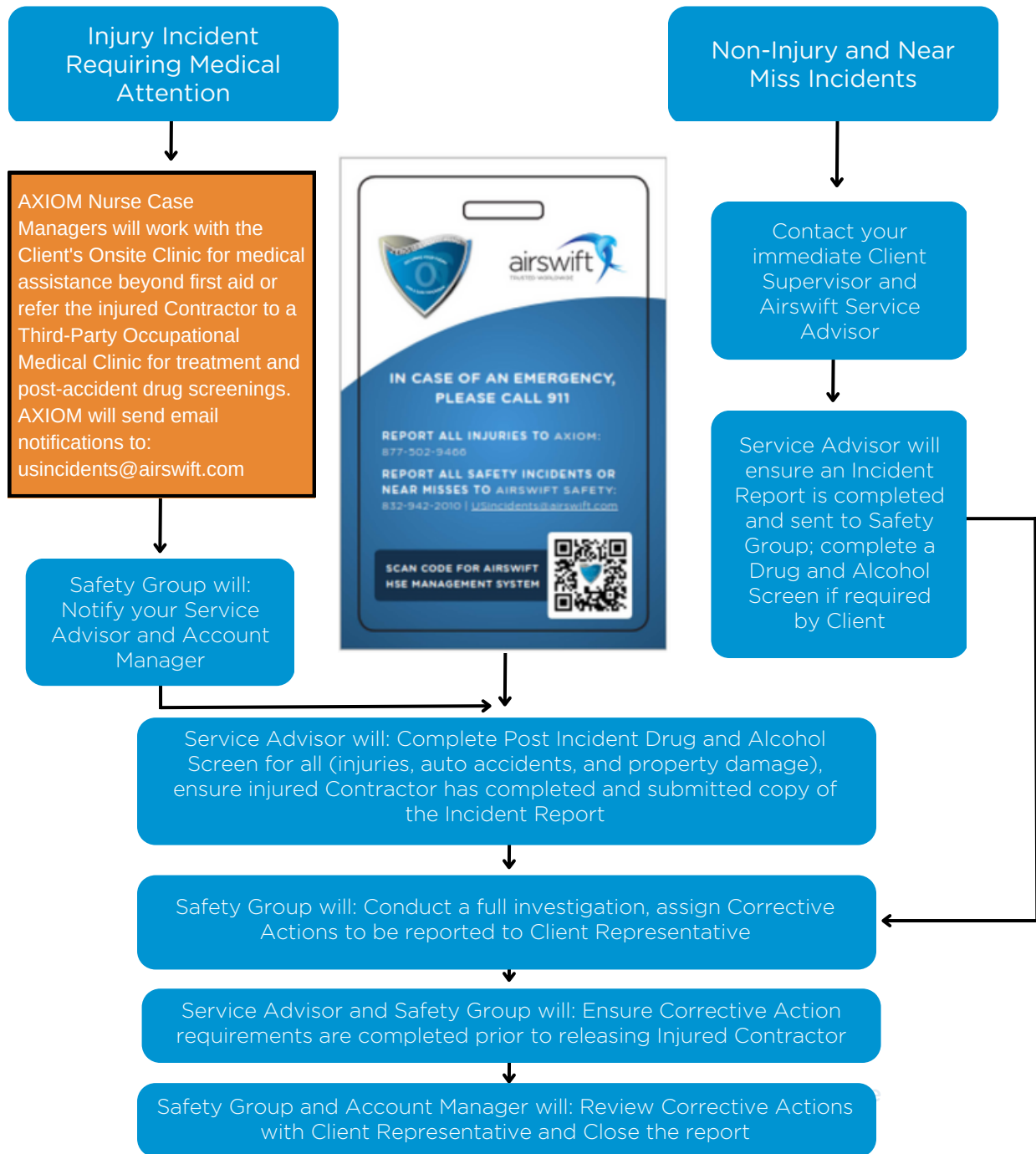
Office  
(Business Hours Only) +713 328 4560

Mobile  
(24 hours) +713 725 2780

## 9.1 GENERAL REQUIREMENTS IN EMERGENCY RESPONSE

- Record brief incident details as early as possible as a permanent record of what occurred.
- Employees contributing to the incident response are to record their actions and retain all documents as a permanent record of what was done.
- If the employee is a foreign national in the U.S. whether they are resident working in the U.S. or are only visiting on a business trip; then the employee's nearest representative embassy or consulate may also need to be notified to assist in liaison with U.S. Federal authorities and in repatriation.
- Within eight (8) hours after the occurrence of an employment accident which is fatal to one or more employees or which results in hospitalization of three or more employees; Airswift shall report the accident to the nearest office of the Area Director of the Occupational Safety and Health Administration, U.S. Department of Labor.
- Only a certified physician or coroner can confirm death has occurred. Until this verification is formally received then no notification of death will be communicated publically outside of the organization. All communications will refer to an 'Injured Employee'. Only if death is formally verified will communications refer to a 'Fatally Injured Employee'.
- In the event of death or serious injury of an employee; formal communications will be issued from the SVP - North America only or a senior manager authorized by the SVP - North America to make such communications.

# 9.0 Process 7 - Emergency Preparedness and Response



# 10.0 Process 8 - Mobilization to Client's Workplaces Including Site Entry Requirements

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For Airswift contract employees formally assigned to a client's workplace; Airswift will agree to specific HSE particulars for the mobilization of Airswift employees in the formal agreement between Airswift and client. This HSE Management System will apply as minimum HSE requirements to all mobilized employees regardless of the formal agreement between Airswift and client.

Under no circumstances will any Airswift employee be required to work in conditions exposing them to occupational risk above that typical in an office based environment unless they have voluntarily accepted this risk through signing their personal work agreement including their job description and terms and conditions of the assignment; and they are competent, medically fit and equipped to work in such conditions.

If an employee on special assignment can be exposed to hazardous conditions at a client's worksite then the Operations Manager - North America will agree with the employee and the employee's Airswift Client Account Manager the necessary precautions to be taken during this work. The assigned employee shall understand and implement the agreed precautions and follow the client's site rules and requirements for their protection. The Client shall ensure that a work environment is provided for all Airswift contractors and employees on site.

## 10.1 PERSONAL PROTECTIVE EQUIPMENT

If an employee on assignment to a client's workplace can be exposed to hazardous conditions then the Operations Manager - North America will agree with the employee, employee's Client Service Manager and employee's client the necessary personal protective equipment to be worn during this work and its specification. This personal protective equipment will be provided and where necessary maintained and replaced at no cost to the employee, either by the client or by Airswift. The assigned employee shall follow the client's workplace rules and requirements for personnel protection at all times when exposed to these hazardous conditions. If the employee is required to be around equipment, the Client must ensure that all equipment used at a work site: (a) is maintained in a condition that will not compromise the health or safety of workers using or transporting it, (b) will safely perform the function for which it is intended or was designed, (c) is of adequate strength for its purpose, and (d) is free from obvious defects.

## 1.0 Process 9 - Fit for Work

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Fitness for work encompasses managing elements of personal well-being that can affect work performance and safety. Depending on work assignments, employees may be required to demonstrate a satisfactory level of fitness which shall be certified by a Medical professional prior to engagement by Airswift and at specified intervals thereafter based on age and job role. This is to ensure that the individual's health and safety shall not be compromised. Airswift employees will be required to take a pre-access alcohol and drug test.

Drug and alcohol tests can be used to test for the presence of alcohol or illegal drugs and administered at random, post incident (if there is a reasonable possibility that the use of drugs or alcohol caused or contributed to the incident), or where there is a reasonable suspicion that an individual may not be fit for work.

Refusal by employee candidates to take fitness for duty assessments or drug and alcohol tests may be regarded by Airswift senior management as a justification for not hiring an employee.

Refusal by hired employees to take fitness for duty assessments or drug and alcohol tests will be regarded by Airswift senior management as a justification to terminate an employee.

## 12.0 Process 10 - Risk Assessment and Management

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Airswift senior management may conduct a formal HSE risk assessment for work planning, management of changes, commercial, contractual or other reasons where required.

The Operations Manager - North America will act in the capacity of facilitator when requested by the SVP - North America.

The risk assessment team will comprise several selected members including, where necessary and when authorized by the SVP - North America or senior manager, non-Airswift employees.

The risk assessment team will use the risk assessment proforma and risk terms in to record the assessment. The team will use the Risk / Manageability matrix in to assess each risk and its manageability. Assessed risk will determine prioritization; assessed manageability will focus actions to fill any gaps.

This assessment will be used to identify and evaluate workplace hazards on an as needed basis, such as when new processes or procedures are introduced, and any issues will be prioritized accordingly to be resolved in a timely fashion.

## 13.0 Process 11 - Auditing

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HSE audits will be carried out to ensure that the required policies, processes and safe work practices are in place and that they are working effectively. An annual review of the HSE Management System will occur prior to the anniversary of the latest revision of this HSE Management System such that any audit findings can be incorporated into the annual revision of this document. The audit will be led by the SVP - North America and at least one other senior manager. The Operations Manager - North America will also be a member of the audit team. The SVP - North America may also choose to invite a Airswift Manager from outside the North America Business Unit to contribute and share best practices and

knowledge. The Operations Manager - North America will draft an audit proforma and, once endorsed by the SVP - North America, will be publicized in advance to all those participating such that all who will be touched by the audit will have prior knowledge of its intentions, scope and selected focus areas. All audit findings will be communicated throughout the company as agreed.

Audits may also be conducted by outside third party specialists including insurance representatives, consultants and client representatives as agreed to by the SVP - North America.





