

Occupational Health and Safety Policy (OHS)

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1.0 General Statement

Investec is committed to ensuring the health, safety, and welfare of its employees, so far as is reasonably practicable. We also fully accept our responsibility for other persons who may be affected by our activities. We will take steps to ensure that our statutory duties are always met.

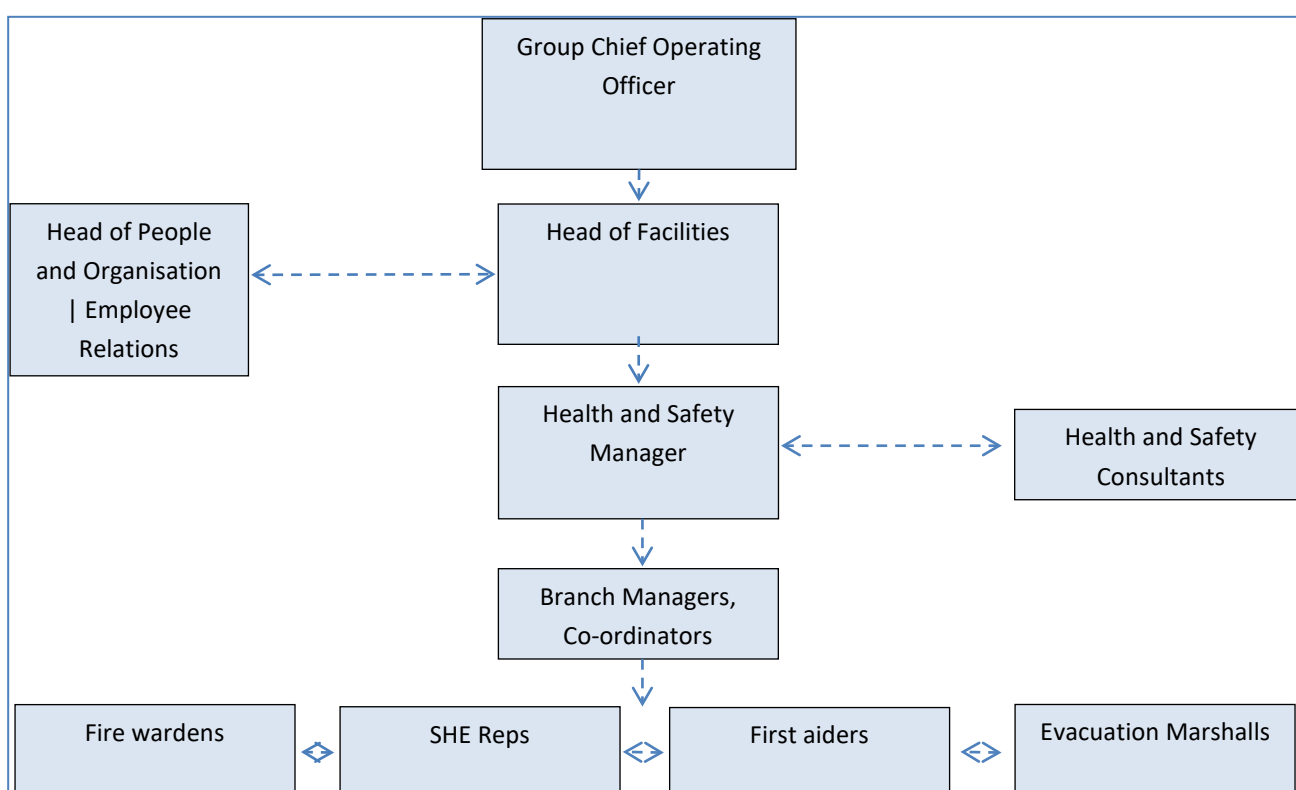
- Management will ensure that all processes and systems of work are designed to take account of health and safety and are properly always supervised.
- Adequate facilities and arrangements will be maintained to enable employees and their representatives to raise issues of health and safety.
- Competent people will be appointed to assist us in meeting our statutory duties including, where appropriate, specialists from outside the organisation.
- Each employee will be given such information, instruction, and training as is necessary to enable the safe performance of work activities.
- Every employee is required to co-operate to enable all statutory duties to be complied with. The successful implementation of this policy requires total commitment from all employees. Everyone has a legal obligation to take reasonable care for his or her own health and safety, and for the safety of other people who may be affected by his or her acts or omissions.

2.0 Organisational Responsibilities

This Policy relates to Investec Limited (Bank and Wealth including all subsidiaries and regions).

To ensure that health and safety is successfully managed within the organisation, the following responsibilities have been allocated.

Health & Safety management obligations under this policy are overseen by the Risk Chief Operating Officer as chair of the Occupational Health and Safety Committee but integrated into the firm’s governance process via the Chief Operating Officer’s representation at the Group Executive Risk Committee.



2.1 The Chief Executive Officer

The Chief Executive Officer has overall responsibility for health, safety and welfare matters within the organisation. The Chief Executive Officer can delegate his responsibility, to the most appropriate function, which in the case of Investec, it is the Group Chief Operating Officer.

He/she shall ensure:

- Appropriate resources are allocated to allow for the elimination and/or control of known hazards and to safeguard against the introduction of new risks.
- Any individual failing to discharge his or her health and safety responsibilities satisfactorily shall be reprimanded as necessary, and subject to disciplinary action in accordance with Investec’s disciplinary procedures.
- He/she sets a personal example by demonstrating high standards of application and discipline in health and safety.

2.2 People and Organisation

The Head of People and Organisation | Employee Relations is responsible for:

- Setting Occupational Health and Safety related policies for staff to adhere to in the interest of their health and safety such as leave, sick leave, working conditions policies, mental wellbeing policy and other policies as deemed appropriate for the organisation and required by the Labour Relations Act.
- Ensuring that processes are in place for the management and recording of relevant health and safety training for staff.
- Ensuring that a process for non-compliance with the above processes and systems are in place.

2.3 Management

Management plays a key role in ensuring the health, safety, and welfare of staff. Responsibilities are to ensure that:

- Ensuring the appointment of sufficient health and safety representatives | marshals as required by legislation-the requirement is 1 marshal per 100 staff members in a corporate environment.
- Ensuring that appointees attend the relevant training.
- Team members understand their responsibilities for reporting hazards, faulty equipment, ideas for improvement, etc.
- Prompt corrective action is taken whenever unsafe acts are noticed or reported to them.
- The work environment is free from obvious hazards.
- When individuals' circumstances change, that these are notified to People and Organisation.
- Unsafe practices are reported to the Health & Safety Manager.

2.4 Head of Facilities

The Head of Facilities is responsible for ensuring that the tasks delegated to the Health and Safety Manager are undertaken. The Head of Facilities will support the Health and Safety Manager and provide appropriate resources to ensure the successful implementation of the Health and Safety Policy.

2.5 The Health & Safety Manager

Day-to-day responsibility for health and safety matters lies with the Health & Safety Manager, reporting to the Head of Facilities. The Health & Safety Manager fully supports the Health & Safety Policy and has responsibility for:

- Implementing the Health & Safety Policy.
- Training and awareness of the Health & Safety Policy, the policy is made available on the Investec intranet and annual training and awareness is included in the Operational Resilience awareness programme.
- Ensuring risk assessments are undertaken, reviewed and action plans are agreed, implemented, and monitored.
- Monitoring the effectiveness of planning to control risks and hazards.
- Ensuring an approved contractor list is compiled and kept up to date.
- Ensuring that contractors have appropriate health and safety policies in place and that they are implemented when working at Investec premises

- Ensuring that effective systems of communication for health and safety are provided.
- Monitoring employees' compliance with the Health & Safety Policy and their understanding of their delegated responsibilities.
- Carrying out regular inspections of the premises and maintaining records to ensure that premises are maintained in a safe working condition, all welfare facilities monitored, and walkways kept clear.
- Ensuring that appropriate safety equipment is in place and maintained such as fire extinguishers and evacuation chairs.
- Assisting People and Organisation by carrying out the health and safety elements of new starter induction training.
- Ensuring there is sufficient trained First Aiders, Evacuation and Fire Wardens selected and that their details are kept up to date.
- Ensuring the first aid boxes are correctly stocked and the defibrillators are checked on a weekly basis.
- Ensuring that all reported accidents are recorded in the accident book and fully investigated.
- Liaising with building maintenance contractors and ensuring relevant corrective actions are implemented.
- Arranging and hosting the Health and Safety Committee meeting on a quarterly basis and ensuring an accurate record of the meeting is made and distributed. Convening of the committee will only take place if there is a need to discuss specific matters or escalations of specific incidents. Quarterly reports will be distributed via email to committee members.
- Ensuring arrangements are in place to ensure a suitable person is available to accompany any Enforcement Advisor on any audit or enquiry and that action is taken on their recommendations

2.6 Health and Safety Representatives

A Health and Safety Representative, also known as a SHE Rep, is a person who is appointed in the workplace to represent his/her fellow employees to ensure that all risks and hazards are identified and dealt with as far as is reasonably practicable. The Health and Safety Representative consults with and make representation to the the Health and Safety Manager, on all, health, safety and welfare matters which may affect employees as well as any other person/s who may be affected by the work undertaken in a specific workplace.

According to **Section 18 of the OHS Act** the following are the responsibilities of the SHE Rep:

- A SHE Rep may:
 - Review the effectiveness of health and safety measures in the workspace for which he/she was appointed;
 - Identify potential hazards in the workplace;
 - Assist in the examining of potential the causes of incidents;
 - Assist in the investigation of employee complaints regarding health and safety;
 - Attend meetings for the health and safety committee of which he/she is a member.
 - Participate in any internal health and safety audit.

2.7 Evacuation Marshalls

Sufficient Evacuation Marshalls shall be appointed for individual Investec offices and premises. They should be trained in safe evacuation procedures so that they can assist the Evacuation Team, Fire Brigade, Facilities/Building Managers and Security staff in the event of any emergency situation.

The responsibilities of an evacuation marshal are:

- Be aware of the areas assigned to you as your responsibility.
- Be familiar with the exits of the whole building, especially the area for which you have been made responsible.
- Make sure that you are familiar with all the emergency equipment in the building.
- Assist the Health and Safety Representatives in your building in identifying any hazardous situations in your building.
- Know where the building's EMERGENCY ASSEMBLY POINT is located.

When the Emergency Alarm is sounded:

- Listen for instructions from the Safety Manager/Emergency Controller/Health and Safety Representatives.
- If instructed to evacuate, or the fire spreads, instruct people to immediately evacuate the building.
- Direct people to the nearest/safest emergency exit route.
- Advise people to:
- Keep to the left when going down the stairs
 - Not to use the lifts
 - To close all doors and windows in case of fire (to prevent fire spread)
 - To open all doors and windows in cases of suspected bomb threat
 - Assemble at the Assembly Point
 - Report to roll call marshals
- Sweep the area assigned to you to ensure all personnel have left the building.
- Help disabled persons evacuate with Evac-Chairs or assist disabled persons to disabled refuges.
- On completion of the evacuation, report immediately to the Emergency Controller at the Assembly Point.

2.7 First Aiders

Sufficient First Aiders shall be appointed for individual Investec Offices and premises. Operational Resilience representatives embedded in the business units will assist the Safety Manager in appointing sufficient first aiders within business units and to ensure that they hold valid certificates. They will also ensure that first aid boxes are available and correctly stocked. The location of first aid boxes and the names/location of trained First Aiders will be displayed on notice boards and on the intranet.

The principal health and safety duties of the First Aiders are as follows:

- Giving help in the form of basic medical assistance to someone who is injured or ill and taking care of them until professional medical help arrives. To attend training as necessary to maintain a valid certificate as long as they are appointed as first aiders..
- In buildings where a defibrillator is provided, it should only be used by appropriately-trained First Aiders.

2.8 Fire Marshalls

Sufficient Fire Marshalls shall be appointed for individual Investec offices and premises. They should be trained in basic firefighting and safe evacuation procedures so that they can assist the Evacuation Team, Fire Brigade, Facilities/Building Managers and Security staff in the event of a fire or other emergency situations (E.g:Security/bomb scare).

The Fire Marshals are responsible for:

- Promoting general fire awareness and fire safety in the workplace;
- Familiarising themselves with the operation of fire-fighting equipment used in the workplace;
- Checking fire-fighting equipment in their workplace at least once a month to ensure it is in working order;
- Identifying items, equipment and areas in their workplace which may be a fire hazard;
- Reporting any unserviced or damaged firefighting equipment or fire hazards to the Safety Manager/ HOD/manager/team leader for necessary action, and to your health & safety rep for inclusion in health and safety report;
- Checking emergency escape routes on a regular basis to ensure they are not obstructed;
- Assisting with the safe and prompt evacuation of Investec Offices in the case of an emergency.
- Attending training as necessary.
- In an emergency, the fire marshal may also be required to assist with one or more of the following tasks:
 - Raise the alarm
 - Call emergency services;
 - If safe, use the fire extinguisher;
 - Direct staff to safe available exit routes;
 - If safe, check areas such as toilets and storerooms to ensure all are evacuating;
 - Assist disabled people;
 - Close windows & doors;
 - Ensure hazardous processes or machinery have been shut down or isolated;
 - Assist with roll call at the assembly point;
 - Report to the fire service on their arrival.

2.9 The Occupational Health and Safety Committee

The Occupational Health and Safety Committee (The Committee) has been set up and shall be run on a quarterly basis. The Committee comprises of the Chief Operating Officer of Group Risk, Head of People and Organisation and or the Employee Relations representative, Health and Safety Manager, Head of Facilities, Operational Resilience Manager and Head of Operational Risk. The Committee is supported by the Operational Resilience Working Group (ORWG) and Health and Safety Representatives. The Committee aims to provide Investec with a mechanism for consulting with employees on matters of health and safety. Any issues to be escalated to the committee by the ORWG and if Board awareness is required, the matter will be escalated from the committee to the Board. Escalation points such as severe incidents and fatalities are also part of the annual sustainability report to the Social and Ethics committee.

The Occupational Health and Safety Committee's duties:

- Members meet when required, in order to initiate, promote, maintain and review measures of ensuring the health and safety of the workers; quarterly report from the Health and Safety Manager to be distributed and committee to meet only when escalations are required;
- To keep records of recommendations to employers and inspectors (3years);
- Where these recommendations do not lead to solving the matter, the committee may make recommendations to an inspector;
- Shall discuss, report and keep records of incidents in which someone is killed, injured, or infected with a communicable disease
- To represent their team/department/office and to give them the opportunity to put forward suggestions or highlight any concerns regarding health and safety.

2.10 Branch Health and Safety Co-ordinators

Day-to-day responsibilities for health and safety at Investec branches and offices are carried out by Branch Health and Safety Co-ordinators.

Specifically, they are responsible for:

- Assisting People and Organisation | Facilities Manager by carrying out the health and safety elements of new starter induction training.
- Ensuring that any visiting contractors are assessed for Health and Safety competence and that the appropriate Third-Party Health and Safety Assurance Questionnaires are completed and retained on site for future reference/audit purposes.
- Reporting any unsafe working practices.
- Regularly carrying out inspections of the premises and maintaining records to ensure that all facilities are maintained in a safe working condition, welfare facilities are monitored, and walkways kept clear at all times.
- Ensuring all accidents are recorded in the accident book and reported to the Health & Safety Manager as appropriate.

2.11 Employees

All employees irrespective of status have the following responsibilities:

- To take reasonable care for their own health and safety and to consider the safety of others who may be affected by their high-risk actions.
- To be familiar with all relevant information in the health & safety policy and any additional relevant procedures and to co-operate in the implementation of their contents.
- To report any hazards on their respective floors or at workstations to the SHE Rep of the floor.
- To co-operate with the investigation of accidents and any subsequent corrective or preventative actions.

Failure to comply with any health and safety instructions, work procedures or safety rules may result in disciplinary action in accordance with the organisation's disciplinary procedures.

3 Evacuation exercises

- All Investec buildings and branches must have an up-to-date Emergency Action Plan that is reviewed annually.
- All Investec building and branches will conduct an evacuation exercise to train staff and occupants, and to elevate their efficiency and effectiveness, in carrying out emergency evacuation procedures at least annually. The Health and Safety Manager and Branch Health and Safety Co-ordinators, together with security will plan, organise, and oversee the drills. It is advised to include local Disaster Management and Law Enforcement departments in the planning of the evacuation exercises.
- All drills and the outcome of the drill are to be recorded and a report of outcomes tabled and discussed at the Occupational Health and Safety Committee.
- All records to be stored for inspection by the Health and Safety Manager.

4 Reporting of incidents and fatalities

Reporting of incidents and fatalities are conducted as per legislation:

- All incidents are recorded and retained by the Health and Safety Manager.
- Incidents requiring medical intervention are recorded on workman's compensation forms and submitted to the processing hospital and the labour department. The records are retained by People and Organisation as well as the Health and Safety Manager.
- Fatalities are recorded in an incident report and reported to the labour department and the police.
- The matters are discussed and noted at the quarterly Health and Safety Committee for recording and mitigation actions to prevent similar events occurring where required.
- All serious and fatal incidents are quarterly reported at the Social and Ethics Committee.

5 Review and monitoring of the policy

- This policy will be monitored regularly to ensure that the objectives are achieved by the Health and Safety Manager.
- It will be annually reviewed and, if necessary, revised in the light of legislative or organisational changes by the Health and Safety Manager.

6 Policies that are interconnected with the OHS Policy

- Operational resilience policy