



Section C.3.1


TDI Health Safety and Environment Policy



The Development Initiative

Health, Safety & Environmental Policies



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LETTER FROM MANAGING DIRECTOR

The Development Initiative (TDI) is committed to maintaining safe work practices and solid environmental practices within our organization. These practices allow us to achieve the quality of products and services that our clients expect; continue to grow the good business practices that we have built TDI around; and provide a safe and responsible work environment to allow for growth of the company as a whole.

As the CEO of TDI, I expect total commitment, individual responsibility and accountability from each of our staff members and contractors, complying fully with our HSE policies, procedures, standards and guidelines as a minimum condition of their employment with TDI.

We must create a safety conscious culture on all of our projects from my position down to our front line worker, not because we are ticking some corporate box, but rather because it is the right thing to do. We want to complete each project with all of our team members healthy as a minimum and it is the responsibility of each of you to motivate, lead by example, and monitor the performance of our work as a company in this regard.

This commitment to HSE originates from the TDI Board of Directors and Senior Managers. The HSE policies and procedures combined and used in conjunction with our Standard Operating Procedures (SOP) clearly outlines the safe work practices that we will execute in our daily operations to enhance our world-wide reputation as a responsible and safe company that provides a superior product every time.

I challenge each and every one of you to make a difference

Hugh Morris
Managing Director



ENVIRONMENTAL STATEMENT

TDI recognizes its responsibility to protect the environment at every stage of its operations. All levels of TDI shall work towards the goal of a zero foot print on our projects.

We will partner with others from the areas in which we are working to design processes to identify and reduce actual or potential risks to the environment, such as the cause of fires, spills and other damage that might result environmental damage.

All Staff and Contractors will share in this responsibility to protect the environment and shall practice appropriate waste management and the containment of hazardous materials. Our minimum standard for waste management and environmental protection will be in full co-operation with the standards and the legislative requirements of the area in which we are working.

Hugh Morris
Managing Director



MEDICAL AND FIRST AID POLICY

It is the policy of TDI to ensure that the medical health, fitness and well-being of its field Staff and contractors is not compromised.

To this end TDI undertakes to:

- Ensure that all personnel, Staff and contractors engaged on a task are fit for work and healthy, by a pre-employment screening,
- Ensure adequate medical facilities are available to staff and sub-contractors to treat work related ailments and injuries,
- Provide First Aid training to ensure that each job-site has a minimum of 51% of its workers competent and trained in First Aid to respond to emergencies,
- Provide preventative medical examinations where required,
- Develop contingency plans for the handling of medical emergencies,
- Ensure that personnel do not work excessively long rotations.

Hugh Morris
Managing Director



RESPECTFUL WORKPLACE POLICY

TDI is committed to creating and sustaining a vibrant, healthy, safe, and caring work environment for everyone that works with us. To do so, all will be treated with respect, honesty and dignity. Behaviour or situations that run contrary to such treatment will not be tolerated.

TDI will respond to complaints about inappropriate behaviour in the workplace in timely fashion and strive to resolve issues openly, honestly and with appropriate privacy.

We are committed to working in collaboration with of our staff and consultants to create a respectful workplace by:

- Promoting and maintaining a common understanding of the expectations of behaviours considered appropriate and inappropriate in all TDI workplace environments
- Taking action to prevent and/or deal with inappropriate behaviour where TDI is conducting business.

This policy applies to all TDI Staff and Contractors providing a service for or on behalf of TDI and at all facilities, job sites, offices or other work environments

As a TDI employee or consultant you are responsible for creating a respectful workplace environment by:

- Ensuring your behaviour is respectful and appropriate at all times; accepting responsibility for your own reactions and behaviour and its impact on others,
- Making sure your concerns are known promptly if something is troubling you,
- Being part of the solution; immediately informing your supervisor if there is an imminent threat or risk of violence that could compromise any individual's safety,
- Keep a record of dates, times, locations, witnesses and number of incidents,
- Advise the individual engaging in any inappropriate conduct that their actions are unwelcome, and ask them to stop.
- Report the behaviour if it persists.

Any employee or consultant who violates this policy will be subject to appropriate disciplinary action, which may include termination of employment or agreement.

Hugh Morris
Managing Director



SMOKING POLICY

Smoking is only permitted in designated areas and with due regard to other workers and the public. Smoking is prohibited in re-fuelling areas, propane storage, offices, camp kitchen, recreation room, camp rooms or tents and around explosives. Staff that fail to comply will be subject to enforcement principles up to and including dismissal.

Hugh Morris
Managing Director



COMPLIANCE / CORRECTIVE DISCIPLINE POLICY

It is both management and each employee's responsibility to ensure compliance with all regulatory, company and client rules, practices, procedures and policies.

This policy is designed to correct employee's actions that are not consistent with the above, rather than terminate the employee or consultant from employment. The system allows the employee reasonable opportunity to be aware of the problem behaviour and an opportunity to correct such actions / behaviours; however, employee(s) consultants will not be permitted to continue where the employee's/Consultants actions jeopardize the health and safety of others.

The resultant system of progressive disciplinary action that is implemented and maintained by Project Managers and by the HQ Management is as follows:

Verbal warning

Commencing with a verbal communication with the employee/Consultant regarding his/her performance and non-compliance with an established standard of performance or conduct is the initial step. The employee is expected to rectify his/behaviour after this. A report will be written down and filed on the employee's/consultants file

Written Warning

In the event that the non-compliance persists, a written warning is to be issued to the staff member, a copy to be provided to HQ in which details of the performance that is non-compliant with TDI standards or indeed, lack of improvement if previous disciplinary action has been taken.

Suspension or Dismissal

A written record of events that have resulted in the recommendation to suspend or dismiss the employee/consultant must be completed. Continual failure of employee/consultant to meet standards of performance or major violation of TDI policy or SOP will result in immediate dismissal with cause.

Hugh Morris
Managing Director



PPE POLICY

It is a TDI requirement for all personnel to use appropriate PPE any time their duties expose them to a possible hazard. TDI provides a variety of PPE for the benefit and safety of their Staff and consultants, including Safety Glasses, Safety Vests, Hard Hats, Safety Gloves, and Hearing Protection. Each specific work area will have its own PPE requirements.

All TDI Staff/consultants shall wear footwear that is appropriate for the task undertaken, and suitable for the environment being worked in.

Site specific PPE requirements (examples): NON-ERW/Landmine Clearance

- Workshop: Safety Toe Boots, Safety Glasses Goggles, Welding Helmets, Neoprene Gloves (any person handling chemicals must protect themselves according to the MSDS for the material they are working with.
- Mechanics: Safety Toe Boots, Hearing protection

Project Managers, will monitor the provision of PPE to ensure that it is available for proper use. Each employee/consultant has the responsibility to utilize the available equipment and to report to his Team Supervisor/leader, immediately, if the necessary PPE is not available, suitable, or not in good condition.

Non-compliance with safety rules places an employee/consultant, his co-workers and TDI at risk, therefore, persistent or deliberate non-compliance with safety rules can be grounds for termination of employment.

Hugh Morris
Managing Director



TRANSPORTATION POLICY

Transportation exposes TDI to more risk than any other activity associated with our operations. To reduce transportation risks to an acceptable level, this Transportation Policy shall be adopted on all TDI projects and operations.

Driver Training and Qualifications

Only approved personnel and contractors are allowed to drive vehicles on behalf of TDI including company-owned or leased vehicles. Approval is granted to drivers who have been approved by the Project Manager and/or completion of TDI approved driving course and competency evaluation.

Vehicle Responsibility

Responsibility for individual vehicles lies with the line managers who use the vehicles with their teams. All Team supervisors/leaders shall ensure that all drivers are trained and qualified and that all types of vehicles under their control are correctly fitted with the appropriate safety equipment.

All drivers are responsible for;

- Checking each vehicle for maintenance, safety equipment and fuel levels prior to driving it
- To follow journey management procedures
- The safety and security of themselves, their passengers and their cargo until the vehicle reaches its final destination

Seat Belts

As a condition of employment, all Staff/consultants and contractors must wear seat belts at all times when driving or riding in a TDI vehicle. Drivers shall be responsible to ensure all passengers are wearing seat belts prior to departure. Failure to comply will result in disciplinary action up to and including termination.

Journey Management

All projects and operating locations shall have in place an active journey management plan that complies with the TDI standard. Each location a Journey Management plan shall address all local driving conditions and identified risks.

Vehicle Tracking System (VTS)

VTS, when fitted, shall be monitored and controlled from the Operations Centre of the project.



The objective is to monitor and control vehicles to ensure that safe driving practices are maintained and used. In addition they shall be used to monitor the location of the vehicle for security purposes. Under no circumstances are VTS to be removed or disconnected.

Hugh Morris
Managing Director

TDI operates on a worldwide basis in areas that can be considered volatile and dangerous. TDI therefore, recognizes its obligations to ensure a healthy, safe, and secure environment for workers, assets, and the communities in which it operates. Our projects will be completed with minimal risk to personnel, property, and the community through the continuous assessment and management of security risks. To achieve the above policy statements the following general principles will apply when security is deemed necessary; or is directed by client and/or TDI.

- Security and protection of Staff is the overriding priority of all business activity
- Project and Operations' Managers are responsible to ensure that the proper resources and a comprehensive analysis of security threats both local and regional are completed before the project or a task begins
- The Project Manager is responsible for the creation; implementation and monitoring of project specific security plan.
- The security resources and their organization of those resources must be sufficient to reflect TDI commitment to a safe and secure environment
- Project Managers and any other designated members of the TDI team shall create Project/Task Specific Emergency Response Plans which shall
 - Set up appropriate training; and ensure enough resources are on hand to carry them out
 - All staff and contractors shall be properly trained in the recognition of security threats and the proper emergency response related to the threat
- Response plans are to be reviewed and tested monthly
- All incidents must be reported and corrective action taken in order to improve the overall standards of security.
- TDI Senior Management shall disseminate new information and procedures to other projects on any lesson found
- All concerned parties shall be briefed of any identified security threats and incidents. This may include liaising with the appropriate government or local agencies (police, military, etc)
- All security activities and procedures in place should make every effort possible to minimize impact on the local communities



Hugh Morris
Managing Director

INCIDENT/ACCIDENT REPORTING POLICY

It is the policy of TDI to create, maintain and file accident/incident reports. Incident/Accident reports that are required to be submitted to any outside agencies or the client shall be submitted in the agreed format.

All incidents and accidents; regardless of severity, resulting in, or likely to cause (near miss), injury or illness shall be reported in order to:

- Establish a written record of factors that cause injuries and illnesses and occurrences (near-misses) that might have resulted in injury or illness but did not, as well as property and vehicle damage
- Maintain a capability to promptly investigate incidents and events in order to initiate and support corrective and/or preventive actions
- Provide statistical information for use in analysing all phases of incidents and events
- Provide the means for complying with the reporting requirements for occupational injuries and illness
- The Incident Reporting System requirements apply to all incidences involving TDI Staff, consultants, contractor employees and visitors, which result in (or might have resulted in) personal injury, illness, and/or property and vehicle damage

To ensure that all staff understands the incident reporting requirements and are aware of their own and other's responsibilities, annual training sessions will be held with all Key Staff/consultants to review procedures and responsibilities. New staff Orientation training shall include information on incident reporting and procedures.

Hugh Morris
Managing Director



WASTE OIL AND TYRES

As part of TDI's ongoing commitment to safe, sustainable and environmentally friendly operations in all theatres the issue of used tyres and waste oil requires specific mention.

Day to day operations and the large fleets that are deployed, together with the use of diesel generators at most sites, invariably require the use of significant amounts of engine oil and tyres.

Both of these items when depleted and of no further operational use can present a serious risk to the environment and their proper and safe disposal is to be undertaken at all times.

1. All tyres when non serviceable will be removed from the vehicle and will remain with the team to be returned to HQ where they are to be properly disposed of in a local authority appointed facility, or they are to be delivered to a regional local authority for proper disposal. No old tyres will be left at any work site by any TDI team. No tyres will be burnt at any time.
2. When any oil change is being undertaken be it on a vehicle or generator, an oil tray is to be in position at all times. Absolutely no oil is to be allowed into the surrounding area at any stage. Once the used oil is released from whichever engine it is being replaced from, it is to be drawn into a sealed plastic receptacle and taken to a proper disposal facility, wherever that may be located. At no stage will any oil be left at any work site, and no oil products are to be released into any water courses.



CAMP WASTE MANAGEMENT

TDI predominantly uses tented or containerised camps for their operations. When operating from these camps, the waste generated is to be managed with a view to the least impact upon the environment.

Waste generated is to be divided into two separate parts, biodegradable and non biodegradable. In respect of bio degradable waste, which will generally be produced by the kitchens, an appropriately sized compost pit is to be dug in an area downwind of the prevailing wind and a suitable distance away from the camp. All biodegradable waste is to be placed into this pit.

In respect of non bio degradable waster, this is, where appropriate to be gathered together for delivery to any municipal waste collection function service. In the event that this is not possible the non bio degradable rubbish is to be gathered in a separate prepared area and burnt. Under no circumstances are tyres to be burnt as part of this process.

TDI teams on deployment should ensure that they travel with containerised stores and remove the need to burn excess packaging as their operations progress.

All camps will take into consideration the siting of the shower and ablution facilities as well as the kitchen facilities. All areas that produce run off water are to be sited away from the main living area and are to be placed downstream.

Gray water is to be directed into vacant and unused land in order to allow it to drain into the surrounding area. No gray water is to be directed into any existing water source at any time.



RENEWABLE ENERGY

As part of TDI's ongoing commitment to the protection of the environment, the company plans over the next 3 years of operations to transform all of our field operations from portable generator based to renewable sources of power. With the right investment TDI is confident that all mobile camps will be powered by solar panels by the year 2016. All TDI fixed field camps will be powered by at least 50% solar energy.

This will include the ability to power the following:

- Lighting.
- Computers and printers.
- HF Radio communications.
- Metal Detector charging.

Thereafter, TDI intends to introduce solar cookers where possible to harness the energy of the sun to prepare meals and remove the need for open fires.

By moving more to sustainable and renewable energy sources, TDI will reduce its impact on the environment, and ensure that our footprint is as light possible.

We trust further that our operations would serve as an example to the communities within which we work.