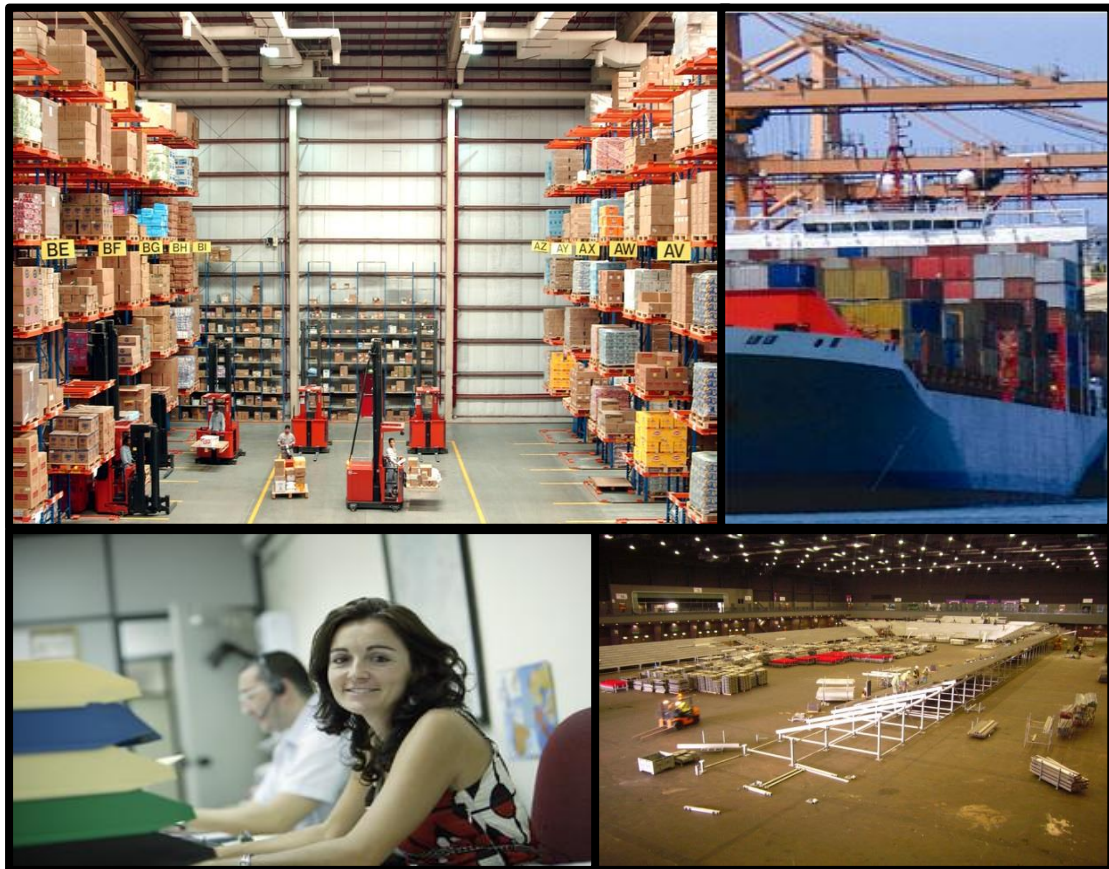




## Global Integrated Logistics

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### Occupational Health & Safety Management System Manual



## Prepared By

Document Owner	Organization Role
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## Version Control

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## 1 INTRODUCTION

This manual has been developed by the Global QHSS Department in order to establish the global policies and processes for occupational health & safety management throughout the company. This manual supersedes all previous global policies and procedures for health & safety & shall be used to complement existing site, country or regional level occupational health & safety management systems.

Morally, legally and economically, occupational health & safety have become important issues. Multi-national companies, such as Agility GIL, are attempting to remain profitable in an ever-more-competitive, global economy. For our company, addressing health & safety issues means more than good business practice. To us, a strong, systematic and value-added approach to health & safety management means we can stand behind our rallying cry, “go ahead, challenge us” in a manner that delivers our customers outstanding results without compromising the health, safety and general well-being of our most important assets – our people.

There is widespread agreement that the use of management systems can improve organizational performance, including performance in the field of occupational health & safety. When implemented and managed effectively, the policies and processes outlined in this manual provide managers with a system for merging occupational health & safety considerations into day-to-day business routines. Furthermore, it helps to bridge gaps and create solidarity between management and employees – allowing for open communications, productive evaluations and methods for achieving continuous improvement.

This manual focuses primarily on global Agility GIL policy and the processes to ensure that the policy is executed throughout the organization. We recognize that Agility GIL operations are often different in nature & scope; however, the policies and processes contained in this manual are applicable to all company operations – including (*but not limited to*) operations for freight forwarding, contract logistics, projects, chemicals and fairs/events. During the development of this document, careful consideration was given towards drafting relevant and applicable policies and processes for all company business units.

This manual uses recognized management system principles in order to be compatible with quality, health, safety and environmental standards such as the ISO 9000, ISO 14000 and OHSAS 18000 series. The manual also draws information from the International Labor Organization’s (ILO) guidelines on occupational health & safety management systems and closely follows the American National Standards Institute/American Industrial Hygiene Association’s Z10 standard for occupational health & safety management systems (2012).



## 2 PURPOSE, SCOPE & APPLICATION

### 2.1 Scope

This manual defines minimum requirements for occupational health & safety management systems (OHSMS).

**N2.1** *This manual provides basic requirements for OHSMS, not detailed specifications. This approach is designed to provide flexibility to conform to the requirements in a manner appropriate to each organization – and commensurate with its occupational health & safety risks. The manual defines “what” has to be accomplished in generic performance terms, but it leaves the “how” to each organization.*

### 2.2 Purpose

The primary purpose of this manual is to provide management with a tool to reduce the risk of occupational injuries, illnesses and fatalities.

The OHSMS requirements outlined in this manual provide a systematic approach to managing health & safety in the workplace (see **Appendix A**).

### 2.3 Application

This standard is applicable to all business units and operations of all sizes, types and locations across Agility GIL.

The word “shall” is used for requirements. All organizations are expected to meet these requirements at a minimum. Recommendations or explanatory notes are identified by the word “should” and intended to serve as guidance in the implementation or execution of requirements.

At the country level, this manual should be used to establish a framework for the development & maintenance of an organization specific OHSMS; further supported by country requirements, laws and regulations (see **Appendix B**).

In no instance shall the exercise of a legal right or privilege or the fulfillment of a legal obligation by an organization, its employees or authorized representative be considered a nonconformance with any requirement set forth in this manual. Those asserting such rights shall find alternative methods to conform to the standards set forth in this manual consistent with the assertion of those rights.

**N2.3** *This manual is designed so it can be integrated with quality, environmental and other management systems within an organization. It should also assist such organizations to evaluate and improve existing OHSMS.*



### 3 DEFINITIONS

**Audit:** a systematic, independent and documented process for obtaining information and data and evaluating it objectively to determine the extent to which defined audit criteria are fulfilled.

**N3.1** *An independent audit does not necessarily mean from another organization, rather being free of bias or conflict of interest.*

**Compliance:** meeting the requirements of local, state or federal statutes, standards or regulations.

**Conformance:** meeting the requirements of the organization's OHSMS and the standards set forth in this manual.

**Continual Improvement:** the process of enhancing the OHSMS to achieve ongoing improvement in overall health & safety performance in line with the organization's OHSMS and this manual.

**Contractor:** a person or organization providing services to another organization in accordance with agreed upon specification, terms and conditions.

**Corrective Action:** action taken to eliminate or mitigate the cause of a system deficiency, hazard or risk.

**Document:** written, electronic or photographic information such as a procedure or record.

**Documented:** substantiated through the use of documents.

**Employee:** a person who is employed by the organization or by a contractor to the organization when that person is under the day-to-day control of the organization.

**Employee Representative:** an individual authorized by other employees to represent them (1) through a union representing the interests of employees in accordance with the provisions of national or state laws and regulations or collective bargaining agreements or (2) through any other selection process allowed by law.

**Ensure:** to make every reasonable effort to fulfill the requirement.

**Exposure:** contact with or proximity to a hazard, taking into account duration and intensity.

**Exposure Assessment:** the process of measuring or estimating the exposure profiles of workers, including the relevant characteristics of the exposures such as the duration and intensity.

**Hazard:** a condition, set of circumstances or inherent property that can cause injury, illness or death.

**Incident:** an event in which a work-related injury or illness (regardless of severity) or fatality occurred or could have occurred (near-miss).

**Management:** person or group of people who direct and control the operation of an organization.

**Manual:** the Agility GIL Occupational Health & Safety Management System manual.

**Non-conformance:** a deficiency in meeting one or more of the organization's or this standard's OHSMS requirements.

**Occupational Health Assessment:** the collection, analysis, recording and reporting of biological and other data to identify, evaluate and track potential or actual health effects that are associated with being in the work environment.

**Occupational Health and Safety Management System (OHSMS):** a set of interrelated elements that establish and/or support occupational health and safety policy and objectives, and mechanisms to achieve those objectives in order to continually improve occupational health and safety.

**OHSMS Issues:** hazards, risks or management system deficiencies and opportunities for improvement.

**Organization:** a public or private company, corporation, firm, enterprise, authority or institution or part or combination thereof, whether incorporated or not, that has its own management function within Agility GIL. This can consist of one or many branches, sites or facilities.

**Preventative Action:** action taken to reduce the likelihood an underlying system deficiency or hazard will occur or recur in another similar process.

**Record:** a document showing or stating results achieved or providing information or data of activities performed.

**Risk:** an estimate of the combination of the likelihood of an occurrence of a hazardous event or exposure(s), and the severity of injury or illness that may be caused by the event or exposures.

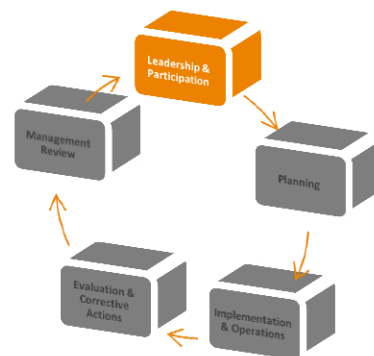
**Risk Assessment:** process(es) used to evaluate the level of risk associated with hazards and system issues.





## 4 LEADERSHIP & PARTICIPATION

This section defines the requirements for management leadership and employee participation. For an Occupational Health & Safety Management System (OHSMS) to be successful, it is vital that management leads through support and application of health & safety practices while employees actively participate and engage in such practices.



### 4.1 Management Leadership

#### 4.1.1 Occupational Health and Safety Management System

Management shall direct the organization to establish, implement and maintain an OHSMS in conformance with the requirements of this manual that is appropriate to the nature and scale of the organization and its occupational health & safety risks.

**N4.1.1** *Leadership begins with management providing the directive for integrating health and safety into the daily functions of the business.*

#### 4.1.2 OHS Policy

The organization, in consultation with workers and their representatives, should set out in writing an OHS policy. This policy shall include commitments to:

- a) Protection and continual improvement of employee health & safety;
- b) Effective employee participation;
- c) Conformance with the organization's health and safety requirements; and
- d) Compliance with applicable occupational health & safety laws and regulations.

The OHS Policy shall be communicated to employees, made available to relevant external interested parties as appropriate, dated and signed or otherwise officially authorized and endorsed by management (*see **Appendix C** for the Agility GIL Global QEHSS Policy*). In addition, the policy shall be reviewed on a recurring basis for suitability.

#### 4.1.3 Responsibility and Authority

Management shall provide leadership and assume overall responsibility for implementing, maintaining and monitoring performance of the OHSMS; including:

- a) Providing appropriate financial, human and organizational resources to plan, implement, operate, check, correct and review the OHSMS.
- b) Defining roles, assigning responsibilities, establishing accountability and delegating authority to implement an effective OHSMS for continual improvement.
- c) Integrating the OHSMS into the organization's other business systems and processes and assuring the organization's performance review, compensation, reward and recognition systems are aligned with the OHS policy and the OHSMS performance objectives.

Management shall ensure that OHS is a known responsibility to all and accepted at all levels.

Employees shall assume responsibility for aspects of OHS, over which they have control, including adherence to the organization's health and safety rules and requirements.

**N4.1.3** *Management involvement and commitment should be measured by inclusion of OHS as an element of the organization's business plan, time spent on OHS, visible personal participation and number of OHSMS tasks performed.*

*Examples of aspects over which employees may have control including working within procedures, communicating concerns and reporting incidents and/or near miss events.*

## **4.2 Employee Participation**

The organization shall establish a process to ensure effective participation in the OHSMS by its employees at all levels of the organization, including those working closest to the hazards by:

- A. Providing employees and employee representatives employed by the organization with the mechanisms, time and resources necessary to participate in, at a minimum, the process of:
  - a) Planning (5.0);
  - b) Implementation (6.0);
  - c) Evaluation, corrective action and preventative action (7.0);
- B. Providing employees and employee representatives with timely access to information relevant to the OHSMS; and
- C. Identifying and removing obstacles or barriers to participation.

**N4.2** *This requirement is applicable to all employees; however, it should give special emphasis to participation by non-supervisory employees because they are often those closest to hazards.*

**N4.2.A** *The intent of this requirement is to encourage employees to:*

- *Have meaningful involvement in the structure, operation and pursuit of the objectives of the OHSMS;*
- *Identify tasks, hazards and risks, and possible control measures;*
- *Participate in planning, evaluation & implementation of control measures.*

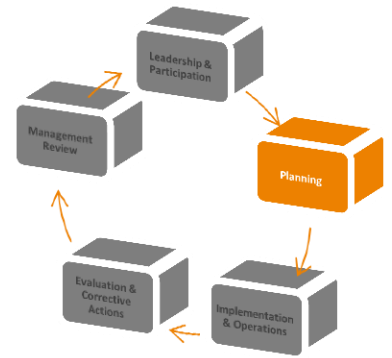
**N4.2.B** *Relevant information should include objective and implementation plans of the OHSMS, results of incident investigations (limited scope), health and safety monitoring data and risk assessments, committee records, injury and illness data and control programs.*

**N4.2.C** *Given the importance of accurate injury and illness data, employees should be encouraged to report injuries, illnesses, accidents, incidents, deficiencies and general concerns. Incentive programs and disciplinary mechanism should be carefully designed to not discourage employee participation and feedback regarding OHS. Obstacles or barriers include lack of response to employee input/suggestions, reprisals (supervisory and/or peer) or any policy, practice or program that penalizes or discourages participation in the OHSMS.*



## 5 PLANNING

This section defines the planning requirements for an OHSMS. The goal of the planning process is to identify and prioritize OHSMS issues and to establish objectives which offer the greatest opportunities for OHSMS improvements and risk reduction consistent with the organization's OHS policy.



### 5.1 Review Process

The organization shall gather and review information to identify OHSMS issues, which includes the processes necessary to establish or improve its management system.

The organization shall establish a review process that identifies the differences between its OHSMS and the requirements of this manual (if in fact any exist).

The review shall include information regarding:

- A. Relevant business systems and operational process;
- B. Operational issues such as hazards, risks and controls;
- C. Previously identified OHSMS issues;
- D. Allocation of resources;
- E. Applicable regulations, standards and other health and safety requirements;
- F. Risk assessments and evaluations;
- G. Process and mechanisms for employee participation;
- H. Results of audits;
- I. Other relevant activities.

**N5.1** *Organizations should conduct a review of their OHSMS (gap analysis) to identify differences between their management system and the requirements of this manual. Organization should maintain documentation of the most recent review.*

**N5.1.A** *System reviews are focused on management system elements and are not specific to operations. Examples include:*

- Determination of resource levels and expertise;
- Effectiveness of communication and employee participation;
- Review of change management timelines and effectiveness.

**N5.1.D** *Resources should include funding, personnel, equipment, mechanisms and results of employee input into the OHSMS data systems. Resources may be internal or external.*

### 5.2 Assessment and Prioritization

The organization shall establish a process to assess and prioritize its OHSMS issues on an ongoing basis as identified in 5.1.

The process shall:

- A. Assess the impact on health and safety of OHSMS issues and assess the level of risk for identified hazards;

- B. Establish priorities based on factors such as the level of risk, potential for system improvements, standards, regulations, feasibility, and potential business consequences, and
- C. Identifying underlying causes and other contributing factors related to system deficiencies that lead to hazards and risks.

**N5.2** *The objective of the planning process is to identify and prioritize OHSMS issues. OHSMS issues are hazards, risks, system deficiencies and opportunities for system improvement.*

**N5.2.A** *The overall purpose of this planning phase is to understand and prioritize OHSMS issues most relevant to the organization. This differs from more detailed risk assessment processes designed to understand and mitigate hazards associated with specific jobs, tasks or equipment.*

### 5.3 Objectives

The organization shall establish a process to set documented objectives, quantified where possible, based on issues that offer the greatest opportunity for OHSMS improvement and risk reduction. The number and content of objectives shall be:

- A. Based on the priorities developed in Section 5.2;
- B. Focused on system improvements to eliminate or control in a sustained manner the underlying causes and contributing factors associated with risk;
- C. Consistent with the organization's occupational health and safety policy;
- D. Set, reviewed and modified at appropriate intervals to reflect efforts to achieve continual improvement; and,
- E. Modified according to changing information and conditions that impact schedule or attainment.

**N5.3** *While organizations are not expected to set objectives for every OHSMS issue identified, they should set sufficient objectives to reduce risk and improve the workplace in a measurable manner. Organizations are not expected to create objectives or implementation plans for quickly resolved "find and fix" issues.*

### 5.4 Implementation Plans and Allocation of Resources

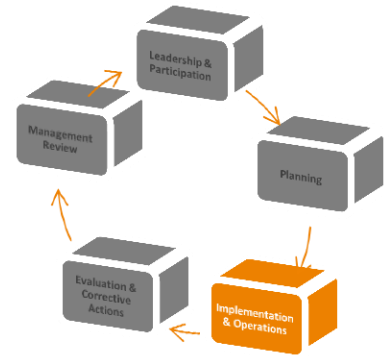
The organization shall:

- A. Establish and implement a documented implementation plan for achieving the objectives. The plan(s) shall define resources, responsibilities, timeframes, intermediate steps and appropriate measurements of progress.
- B. Assign resources to achieve the established objectives of the implementation plans.
- C. Periodically review and update the plan.



## 6 IMPLEMENTATION AND OPERATION

This section defines the operational elements that are required for implementation of an effective OHSMS. These elements are the foundation of an OHSMS and provide the means to pursue the objectives laid out in the planning process. The experience and knowledge that is generated from the application of these elements is fed back into the planning process on a recurring basis – supporting continuous improvement.



### 6.1 OHSMS Operational Elements

The organization shall:

- A. Establish and implement the operational elements defined in this section, as applicable to the organization and its activities, achieve the objectives arising from the planning process, and
- B. Integrate the operational elements into the management system.

#### 6.1.1 Risk Assessment

The organization shall establish and implement a risk assessment process appropriate to the nature of hazards and the level of risk.

#### 6.1.2 Hierarchy of Controls

The organization shall establish a process for achieving the feasible risk reduction based upon the following preferred order of controls:

- a) Elimination;
- b) Substitution of less hazardous materials, processes, operations or equipment;
- c) Engineering controls;
- d) Warnings;
- e) Administrative controls, and
- f) Personal protective equipment (PPE).

Feasible application of this hierarchy of controls shall take into account:

- I. The nature and extent of the risks being controlled;
- II. The degree of risk reduction desired;
- III. The requirement of applicable local, federal and state statutes, standards and regulations;
- IV. Recognized best practices in industry;
- V. Available technology;
- VI. Cost-effectiveness, and
- VII. Internal organization standards.

**N6.1.2** *Often, a combination of controls is most effective. For example, if an equipment modification or noise enclosure (engineering control) is insufficient to reduce noise levels, then limiting exposure through job rotation and using hearing protection would be an acceptable supplemental means of control.*

**N6.1.2.e** *Administrative controls include job training, job planning, rotating and scheduling, changes to work procedures, implementation of work area protection (temporary barricades, etc.) and similar measures.*

### **6.1.3 Management of Change**

The organization shall establish a process to identify and take appropriate steps to prevent or otherwise control hazards at the design and redesign stages, and for situations requiring Management of Change to reduce potential risks to an acceptable level.

The process for design, redesign and Management of Change shall be carried out before any modification or introduction of new work methods, materials, processes or machinery and include:

- a) Identification of tasks and related health and safety hazards;
- b) Recognition of hazards associated with human factors including human errors caused by design deficiencies;
- c) Review of applicable regulations, codes, standards, internal and external recognized guidelines;
- d) Application of control measures (hierarchy of controls – section 6.1.2);
- e) A determination of the appropriate scope and degree of the design review and management of change; and
- f) Employee participation.

**N6.1.3** *“Management of Change” is the process to identify and manage changes to minimize the introduction of new hazards and risks into the work environment. Examples include changes in technology, facilities, equipment, work practices, standards, regulations, etc.*

**N6.1.3.b** *Examples of deficiencies in design that may lead to human error include: machine controls which are difficult to access, control labels which are worn or difficult to read, inconsistent color-coding, materials which are difficult to access, etc.*

**N6.1.3.e** *Examples of conditions that should trigger a design review or Management of Change process include:*

- *New or modified technology, equipment or facilities;*
- *New or revised procedures, work practices or design specifications;*
- *Different types and grades of raw materials;*
- *Significant changes to the site’s organizational structure and staffing; particularly the use of contractors;*
- *Modification or addition of health and safety devices; and*
- *New health and safety standards or regulations.*

#### **6.1.3.1 Applicable Life Cycle Phases**

During the design and redesign processes all applicable life cycle phases shall be taken into consideration – *concept design, detailed design, build/purchase, commissioning/installing, production/maintenance and decommissioning activity.*

#### **6.1.3.2 Process Verification**

The organization shall have processes in place to verify that changes in facilities, documentation, personnel and operations are evaluated and manage to ensure safety and health risks arising from these changes are controlled – *Management of Change.*

#### **6.1.4 Procurement**

The organization shall establish a process to:

- a) Identify and evaluate the potential health and safety risks associated with purchased products, raw materials and other goods and related services before introduction into the work environment;
- b) Establish requirements for supplies, equipment, raw materials and other goods and related services purchased by the organization to control potential health and safety risks; and
- c) Ensure purchased products, raw materials and other goods and related services conform to the organization's health and safety requirements.

**N6.1.4** *The procurement process should be documented (see section N6.4).*

**N6.1.4.a** *For example, organizations should evaluate SDS (Safety Data Sheet) and other health and safety information of a new chemical; or, examine the design specifications and operations manual for a new piece of equipment being considered for purchase.*

**N6.1.4.c** *Related services may include temporary labor, freight transportation, facility maintenance, equipment repair and other services provided by contractors.*

#### **6.1.5 Contractors**

The organization shall establish a process to identify, evaluate and control potential health and safety risks:

- a) To the organization's employees from contractors' planned and unplanned activities, operations and materials on the organization's premises; and
- b) To the contractors' employees from the organization's activities and operations.

This process shall include:

- I. Appropriate contractor health and safety performance criteria;
- II. Include arrangements for the reporting of work-related injuries, illnesses and incidents among the contractor's workers while performing work for the organization;
- III. Provide relevant workplace OHS awareness and training to contractors or their workers prior to commencing work
- IV. Establish effective communication between relevant personnel within the organization and the contractor prior to commencing work – in order to identify, review and control hazards
- V. Regularly monitor OHS performance of contractor activities while on site; and
- VI. Ensure that workplace OHS procedures and arrangements are followed by the contractor(s).

On multi-employer worksites, the organization shall implement a process for coordinating the relevant portions of its OHSMS with other applicable organizations.

**N6.1.5** *Contractors may include transportation providers, maintenance, construction, operations, security, landscaping, facility upkeep, janitorial, sanitation and a number of other functions.*

*Management typically achieves coordination through the use of contracts that clearly define the responsibilities of the parties. Contract award mechanisms or pre-qualification criteria which consider past health and safety performance, safety training or health and safety capabilities should be used to evaluate contractors.*

*If one or more of the other organizations do not have an OHSMS then the organization with the OHSMS should communicate with the other organizations to coordinate its OHSMS with any similar activities.*

#### **6.1.6 Emergency Preparedness**

The organization shall establish a process to identify, prevent, prepare for and/or respond to emergencies, including:

- a) Development of plans to prevent and minimize risks from potential emergencies;
- b) Periodic testing of the emergency plans through drills and similar activities; and
- c) Evaluating and updating the plans and procedures as necessary.

**N6.1.6** *Organizations should identify foreseeable emergencies, natural and man-made, applicable to their operations. The evacuation procedures should address individuals with special needs.*

**N6.1.6.b** *After every emergency or drill, the organization should evaluate the effectiveness of the plan, correct any deficiencies and identify opportunities for improvement.*

**N6.1.6.c** *Emergency preparedness plans should be documented (see Section N6.4)*

### **6.2 Education, Training, Awareness and Competence**

The organization shall establish a process to:

- A. Define and assess the OHSMS competence needed for employees and contractors;
- B. Ensure through appropriate education, training or other methods that employees and contractors are aware of applicable OHSMS requirements and their importance and are competent to carry out their responsibilities as defined in the OHSMS;
- C. Ensure effective access to, and remove barriers to participation in education and training as defined in the organization's OHSMS;
- D. Ensure training is provided in a language trainees understand;
- E. Ensure training is ongoing and provided in a timely fashion; and
- F. Ensure trainers are competent to train employees.

**N6.2.B** *Employees at levels of an organization should be aware of the risks and control measures associated with their job so they are not injured, are better prepared and are educated to fully implement the OHSMS requirements. This awareness training should include information on why safety is important and should be periodically evaluated.*

**N6.2.E** *Training is most effective when conducted before employees are assigned to a job or task; and when changes in job assignment or tasks occur.*

**N6.2.F** *The organization should ensure competent health and safety personnel are available to participate in the implementation of the OHSMS, and to provide adequate technical consultation. This role may be filled by in-house personnel or outside resources.*

*Competence is the ability to apply knowledge and skill to achieve intended results. Competence evaluation for trainers should include both subject matter expertise and proficiency as a trainer.*



### 6.3 Communication

The organization shall establish a process to:

- A. Communicate information about the OHSMS and implementation plan progress with affected levels of the organization and relevant external parties, including contractors;
- B. Achieve prompt employee reporting of work-related injuries, illnesses, incidents, hazards and risks;
- C. Encourage employees to make recommendations regarding possible hazard control and reporting procedures;
- D. Consult with contractors, and relevant external interested parties, when there are any changes that affect their OHS; and
- E. Identify and remove barriers to all of the above.

**N6.3.A** *The extent and nature of the communication should be tailored to the audience both in terms of desired detail and scope.*

**N6.4.B** *The process of reporting work-related injuries, illnesses, incidents, hazards and risks shall include use of the Agility GIL Safety Incident Management System (SIMS) found on the Connections intranet page via the "E-Forms" selection.*

**N6.3.D** *The work activities of contractors can pose additional hazards for employees, visitors and others in the workplace. Processes established for consultation with contractors should ensure risks will be appropriately addressed using good OHS practices.*

**N6.3.E** *Examples of obstacles or barriers may include illiteracy, language differences, reprisals (supervisory and/or peer), policies, practices or programs that penalize or discourage communication.*

### 6.4 Document and Record Control Process

The organization shall establish a process to create and maintain documents and records specified by its OHSMS in order to 1) implement an effective OHSMS, and 2) demonstrate or assess conformance with the requirements of this manual. The process shall require that:

- A. The OHSMS identifies documents which need to be controlled. These documents shall be reviewed and updated as necessary, with dates of revision.
- B. Documents, including records, are legible, readily identifiable and accessible, protected against damage, deterioration, or loss, and retained for a specified period.

**N6.4** *The type and amount of formal documentation necessary to effectively manage an OHSMS should be commensurate with the size, complexity and risks of an organization.*

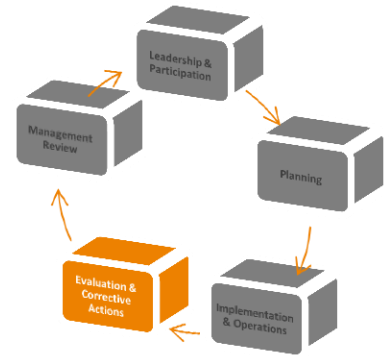
*This manual explicitly requires documentation of the occupational health and safety policy (Section 4.1.2), objectives (Section 5.3), implementation plan (Section 5.4A), audits (Section 7.3) and management reviews (Section 8).*

*An archival and records retention process would facilitate retention of historical knowledge for the organization and ensure outdated documents are removed from use.*



## 7 EVALUATION AND CORRECTIVE ACTION

This section defines requirements for processes to 1) evaluate the performance of the OHSMS through monitoring, measurement, assessment, incident investigation and audits; 2) take corrective action when non-conformance is found in the OHSMS; and 3) include results of evaluation activities as part of the planning process and management review.



### 7.1 Monitoring, Measurement and Assessment

The organization shall establish a process to monitor and evaluate hazards, risks and their controls to assess OHS performance.

These processes shall include some or all of the following methods, depending on the nature and extent of identified hazards and risks:

- A. Workplace inspections and testing;
- B. Exposure assessment;
- C. Injury, illness and incident tracking;
- D. Employee input;
- E. Occupational health assessment;
- F. Assessment of performance relative to applicable legal and other requirements as determined by the organization; and
- G. Other methods as required by the organization's OHSMS.

The results of these processes shall be communicated to relevant parties with attention to applicable laws and regulations on medical confidentiality.

**N7.1** *Organizations should develop predictive or "leading" performance indicators. Such measurements help to identify and correct problems before injury or illnesses occur. Examples of such measurements include near-miss incidents, non-conformance found during inspection, completion of required training or time to close out open H&S action items. The results of these processes should be documented (see Section N6.4).*

**N7.1B** *An exposure assessment should evaluate the health and safety hazards presented to employees as a direct result of their job – this includes measuring, calculating or estimating an individual's contact with or proximity to a hazard. Organizations should design exposure assessment processes and tools consistent with the nature of the hazards in the workplace.*

**N7.1.C** *Occupational injury and illness rates are a common benchmark for measuring the effectiveness of an OHSMS; however, should rarely be used as the sole or primary tool to evaluate performance of an OHSMS. When injury counts are the only measure, there may be significant pressure for organizations to "manage the numbers" rather than improving or managing the process.*

### 7.2 Incident Investigation

The organization shall establish a process to report, investigate and analyze incidents in order to address OHSMS non-conformances and other factors that may be causing

contributing to the occurrence of incidents. The investigations shall be performed in a timely manner.

**N7.1.C** *Incident investigations should begin as soon as practical. Experience shows valuable information may be lost when investigations are delayed.*

*The primary goal is to identify and correct hazards and system deficiencies before any injury or illness occurs. The process should define what needs to be investigated, timeframes for an investigation, who should participate and how recommendations to prevent recurrence should be generated and communicated.*

*In order for incidents to be investigated, they must be reported. Organizations should ensure all barriers to reporting are removed as outlined in Sections 4.2 and 6.3 of this manual.*

### 7.3 Audits

The organization shall establish a process to:

- A. Plan and conduct periodic audits to determine whether the OHSMS has been established, implemented and maintained in conformance with the requirements of this manual.
- B. Audits shall be conducted by competent persons who are independent of the activity being audited.
- C. Document and communicate audit results to:
  - a) Those responsible for corrective and preventative action;
  - b) Area supervision; and
  - c) Other affected individuals, including employees and employee representatives.
- D. Immediately communicate situations identified in audits that could be expected to cause a fatality, serious injury or illness in the immediate future, so prompt corrective action under Section 7.4 is taken.

**N7.3** *Audits required by this section are “system” oriented rather than “compliance” oriented. The audit should determine if the OHSMS meets the requirements of this manual.*

**N7.3B** *This does not mean that audits must be conducted by individuals external to the organization. Employee participation should be encouraged on audit teams. Auditor competency should be appropriate to the scope and complexity of the audit to be performed.*

**N7.3.C** *Communication of audit findings should be consistent with existing company policy, legal, contractual and/or labor management obligations.*

### 7.4 Corrective and Preventive Action

The organization shall establish & implement corrective and preventive action processes to:

- A. Address non-conformances and hazards that are not being controlled to an acceptable risk level.
- B. Identify and address new and residual hazards associated with corrective and preventative actions that are not being controlled to an acceptable risk level.
- C. Expedite action on high risk hazards (those that could result in fatality or serious injury/illness) that are not being controlled to an acceptable level of risk; and

D. Review and ensure effectiveness of corrective and preventive actions taken.

**N7.4** *Corrective and preventive actions should be undertaken in a systematic fashion – the most serious hazards are addressed in an expedited fashion and all actions (regardless of severity) are followed through to completion.*

**N7.4.B** *Residual risk is the remaining risk after controls have been implemented. It is the organization's responsibility to determine whether or not the residual risk is acceptable. Where residual risk is not acceptable, further corrective action must be taken.*

**N7.4.C** *Expedited actions should include efforts to discontinue the exposure by removing the person at risk, discontinuing the operation until it can be made safe or otherwise reducing the risk.*

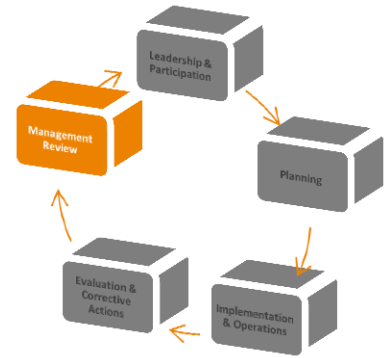
## **7.5 Feedback to the Planning Process**

The organization shall establish a process to ensure the results of monitoring and measurement, audits, investigations and corrective and preventive actions are included in the ongoing planning process (Section 5.2) and the management review (Section 8).

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## 8 MANAGEMENT REVIEW

This section defines the requirements for recurring management reviews of the OHSMS. Recurring management review of the OHSMS effectiveness and relevance to the organization, in conjunction with OHS personnel, is important to improve and sustain long-term health & safety performance within the organization.



### 8.1 Management Review Process

The organization shall establish a process for management to review the OHSMS at least annually, and to recommend improvements to ensure its continued suitability, adequacy and effectiveness.

Inputs to the management review process shall include, among other information:

- A. Progress in the reduction of risk;
- B. Effectiveness of processes to identify, assess and prioritize risk and system deficiencies;
- C. Effectiveness in addressing underlying causes of risks and system deficiencies;
- D. Input from employees and employee representatives;
- E. Status of corrective and preventive actions and changing circumstances;
- F. Follow-up actions from OHSMS audits and previous management reviews;
- G. The extent to which objectives have been met; and
- H. The performance of the OHSMS relative to expectations, taking into consideration changing circumstances, resources, alignment of the business plan and consistency with the company Health & Safety policy.

**N8.1** *The purpose of reviews is for management, with the participation of OHSMS leaders and/or process owners, to do a strategic and critical evaluation of the performance of the OHSMS and to recommend improvements.*

*To be effective, the review process should ensure the necessary information is available for management to evaluate the continuing suitability, adequacy and effectiveness of the OHSMS.*

*The review should include an assessment of the current OHSMS to address if the system is encompassing all of the risks to which the organization is exposed.*

*The management review should consider the results of work-related injuries, illnesses and incident investigations; performance monitoring and measurement; audit activities and other relevant data.*

### 8.2 Management Review Outcomes and Follow-up

At the conclusion of the review, management shall determine the:

- A. Future direction of the OHSMS based on business strategies and conditions; and
- B. Need for changes to the organization's policy, priorities, objectives, resources or other OHSMS elements.

Action items shall be developed from the findings of the management review. Results and action items from the reviews shall be documented, communicated to affected individuals, and tracked to completion (Section 7.4).

**N8.2** *OHSMS management review results should be summarized, specifying management commitments, directives and action items. Action items should specify responsible individuals and target completion dates.*

*Affected individuals include those impacted by or responsible for addressing findings.*

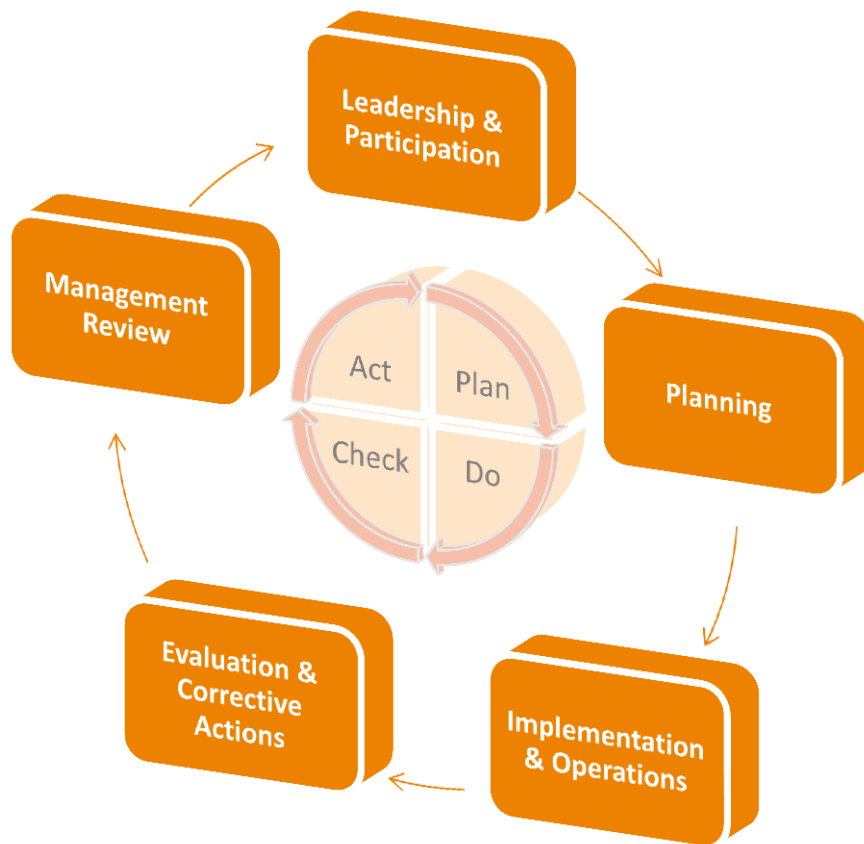
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## 9 APPENDICIES

### 9.1 Supporting Documents

A	Appendix.	Main elements of Agility GIL OHSMS	24
B	Appendix.	Application of Agility GIL OHSMS within organizations	25
C	Appendix.	Agility GIL Global QEHSS Policy	26

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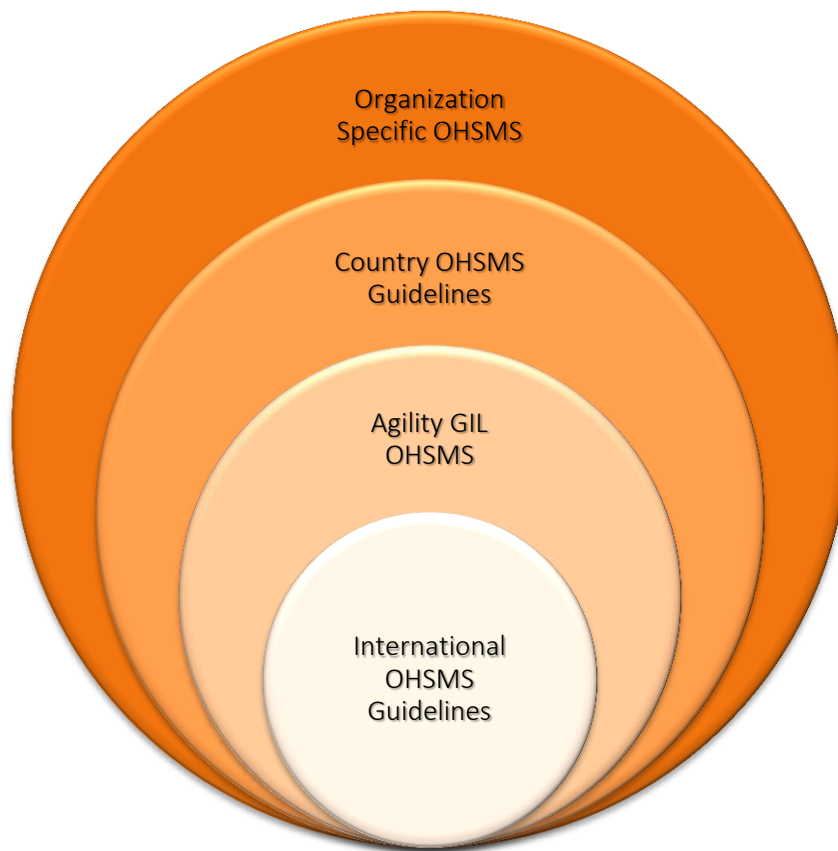
**9.1.A: Main elements of Agility GIL OHSMS****Figure 1: Agility GIL OHSMS Manual**

Occupational health and safety (OHS), including compliance with country OHS laws and regulations, are the responsibility and duty of each Agility organization. Each organization shall show appropriate leadership and commitment to OHS activities and make appropriate arrangements for the establishment of an OHS management system.

The system should contain the main elements of 1) leadership and participation, 2) planning, 3) implementation and operations, 4) evaluation and corrective action and 5) management review. It's not necessary for the system to contain the same language and/or format as referenced above; however, the ideals and concepts represented by each of these elements should be present in some form or fashion within an organization's OHSMS.



### 9.1.B: Application of Agility GIL OHSMS elements



**Figure 2: Agility GIL OHSMS Manual**

The elements of the Agility GIL OHSMS Manual are derived from internationally recognized standards and guidelines on occupational health & safety management – such as those published by the International Labor Organization, American National Standards Institute and others.

When developing an organization specific OHSMS, the Agility GIL OHSMS Manual shall be referenced as a framework in conjunction with any/all country OHS guidelines, laws and regulations. This approach ensures that an organization specific OHSMS utilizes internationally recognized management system standards and conforms to, both, Agility GIL requirements and country OHS laws/regulations.

In no circumstance shall the Agility GIL OHSMS Manual take precedence over a country OHS guideline, law or regulation.

### 9.1.C: Agility GIL QEHSS Policy

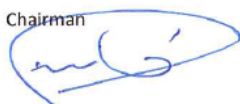
## Quality Environmental Health Safety & Security Policy

Agility is committed to delivering high standards of service to our customers; maintaining environment-friendly operations, protecting the health, safety, security and assets of all of our stakeholders, fostering a culture of continuous improvement and innovation, and practicing good corporate citizenship in the communities in which we operate.

Our Quality, Environmental, Health, Safety and Security (QEHSS) policy is effected through:

- **Customer Satisfaction**  
Delivering unparalleled personalized customer satisfaction through service reliability and innovative solutions.
- **Compliance**  
Comply with current applicable legislation, statutory, regulatory, international standards, customer and other stakeholder requirements – consistent with our management system framework and business code of ethics standards.
- **Pollution, Incident and Security Breach Prevention**  
Implementing safe work practices, and appropriate operating and administrative controls to prevent:
  - Pollution and harmful emissions
  - Over consumption of physical resources and energy
  - Waste through minimization, reuse and recycling
  - Work-related injuries, health concerns and safety incidents
  - Stakeholder assets loss and security breaches
- **Training and Competency**  
Effective training and education that is dedicated to ensuring our employees knowledge and skills are aligned and compliant with our relevant management system requirements.
- **Communications**  
Our policy is communicated appropriately to our employees, customers, suppliers, contractors and other relevant third parties.
- **Measurement and Continuous Improvement**  
Our management systems ensure continual improvement through periodic review of our policy, business processes, objectives and targets; recognizing relevant business conditions, potential risks, changing conditions, and new information.

Tarek Sultan  
Chairman



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