

## Policy on Health, Safety, Environment and Quality

We are committed to being a World Class organization, and to be the contractor of choice in Hong Kong, Macau, Singapore, China and Southeast Asia. We believe that Quality, Safety, Efficiency and Good Value are interrelated aspects of the excellent engineering upon which the Gammon business is based.

Over all business considerations, Safety will always take priority and nothing should compromise safety and our total commitment to Zero Harm.

We aim to work actively with Customers to provide added value, making best use of our abilities and resources to develop innovative solutions and manage risk such that delivery will be incident, accident and environmental occurrence free.

From the Executive Committee, Directors and our senior teams, the commitment to Health, Safety, Environment and Quality (HSEQ) will be highly visible, consistent and under regular review.

To underpin our philosophy and approach in HSEQ, we will set objectives (Bold Commitment, 25by25) and engage with the industry and stakeholders to challenge ourselves and the trade practices to continually “raise the bar” by improving standards for health, safety, environmental and quality performance.

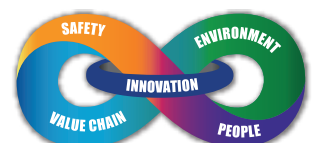
We will adopt the four principles of:

### Strong and Visible Leadership

- Leaders will be mindful of risks and informed as to how these are being addressed.
- They will maintain a fair and just culture that allows all of our stakeholders to engage in the delivery of this policy yet holds everyone accountable for their actions, the teams are resourced and competent to manage and mitigate risk.
- Leaders will adopt innovative thinking that promote culture for implementation and continual improvement of health, safety, environmental and quality performance.

### Structured and Risk Based Approach

- In planning of operations, we will identify the specific risks, opportunities and consider life cycle stages relevant to each task and provide safe and healthy working conditions to achieve Zero Harm; prevent work-related injury, ill health, environmental occurrence and defects of products; improve outputs and to enhance quality, effectiveness, efficiency and preserve the environment.
- Practical and resilient methods will be developed to fully control these risks, otherwise work will not proceed. Method shall be reassessed where circumstances or operational controls change.
- We will adopt modern and innovative methods of construction in our Layers of Protection to eliminate and best manage occupational health and safety risks, quality defects and environmental impacts,
  - ▶ Design and Engineering
  - ▶ Plant and Equipment
  - ▶ Process
  - ▶ People



## Effective Implementation and Supervision

- Frontline staff and managers are responsible for the implementation of agreed methods.
- Compliance with legislation, contractual requirements to which Gammon subscribes is a fundamental minimum requirement.
- The Gammon HSEQ Management System procedures, Golden Rules, Bold Commitments and Safety Standards define our minimum requirements including duties and responsibilities.
- We will maintain clean and tidy work fronts, clear access to all locations and effective emergency response process.
- Should any operation depart from the requirements of this policy, managers and supervisors must stop work and institute rectification and improvement measures.
- Senior managers will regularly monitor and support their staff to ensure that all operations are being conducted in accordance with this policy.

## Engagement and Communication

We will:

- Monitor the needs of our business partners and be proactive in addressing their needs.
- Enhance customer satisfaction by providing a consistently high quality of services and products that satisfy applicable legal requirements; fulfill compliance obligations; meets and exceed customers' expectations.
- Engage frequently and proactively with local communities and the industry to find ways in which we can prevent pollution; protect ecosystems; use sustainable resource; mitigate climate change; minimize impacts and add value to the quality of life of those affected by our operations when we consider different life cycle stages.
- Ensure effective participation and consultation of employees, workers and workers' representatives in the HSEQ management system.
- Provide adequate and regular training and briefing to equip our workforce with the necessary safety, health and environmental awareness and competencies to meet work requirements.
- Seek continual improvement of HSEQ management system to enhance the performance through regular performance monitoring, System Assurance Validation (SAV), and by setting challenging Bold Commitments, objectives, targets and Gammon standards.

This policy, together with our management system, will be reviewed regularly and updated as appropriate to ensure continuing suitability and effectiveness.

This policy will be issued and explained to all staff through departmental briefings shall be displayed on company notice boards and will be available on our intranet.



Thomas HO, JP  
Chief Executive  
Gammon Construction Limited

February 2019

