

OCCUPATIONAL HEALTH AND SAFETY POLICY AND MANAGEMENT

PROGRAM

1. HEALTH AND SAFETY POLICY - GENERAL STATEMENT

Krystalline Salt Limited recognizes that good safety and health regimes have positive benefits to business as they directly affect employees who are our key assets. Consequently, the company is committed to ensuring effective management of all our workplaces in relation to workers' safety, health and welfare as part of our core obligation.

Krystalline Salt Limited is committed to providing a safe work environment for its staff, customers and visitors as provided for in the Occupational Safety and Health Act, 2007 and other subsidiary Rules and Regulations.

We are committed to:

1. Complying with legal statutory requirements as a minimum standard.
2. Ensuring a safe workplace by maintaining safe working methods, systems of work and safe working equipment through adequate training, supervision and competency of staff.
3. Monitoring and reviewing our systems and prevention measures to ensure their effectiveness through annual safety audits and regular safety inspections by competent persons.
4. Conduct regular risk assessment of the workplace activities to achieve a reduced rate of injury occurrence.

5. Providing sufficient and effective information, instruction and training to our staff, visitors and clients regarding their safety around the workplace.
6. Ensuring effective communication and consultation with workers and their representatives.
7. Adequate provision of appropriate Personal Protective Equipment to all workers in an effort of ensuring their safety in the workplace.
8. Maintaining a system for injuries and incidents/near miss reporting, recording and investigation.

9. Setting targets and objectives to develop a culture of continuous improvement.

10. Ensuring adequate resources and facilities including welfare arrangements are made available as is reasonably practicable to ensure good health and safety of employees, visitors and clients.

11. Maintaining a comprehensive Occupational Health and Safety Management Program as a standard guideline to our commitment.

Signed:

(Managing Director)

KRYSTALLINE SALT LTD.
GONGONI MALINDI
Box 63-80260
Date: _____

Date:

09/01/19

2. ORGANIZATION AND MANAGEMENT OF HEALTH AND SAFETY

Management

The management is responsible to ensuring that:

- The right health and safety policy is put in place.
- Adequate budget is set for the implementation of the policy.
- The right organizational structure is in place for the implementation of the policy.
- Competent people are employed.
- Workers, clients and visitors comply to the set policy through visible leadership

Compliance Officers

Compliance Officers are responsible for ensuring that:

- Providing advice and guidance on health and safety standards as per the legal and statutory requirements.
- Promoting a positive health and safety culture.
- Advising management on injuries and incidents/near miss prevention.
- Developing and implementing policy.
- Overseeing the development of adequate risk assessments.
- Identifying training needs for all employees.
- Monitoring health and safety performance.
- Overseeing incidents/injuries reporting and investigations.
- Overseeing enforcement of Personal Protective Equipment Use.

Heads of Departments/Supervisors/Shift in charge

They are responsible for Health and Safety of the staff that work directly under them and areas/activities under their control by:

- Ensuring that all appropriate safety measures are in place and being carried out effectively.

- Ensuring that the safety policy is implemented within their own departments.
- Monitoring the workplace to ensure that safe conditions are maintained.

- Promoting a positive health and safety culture.

- Taking measures to prevent injuries and incidents/near miss in their departments.

- Ensuring their employees are trained as per the identified training needs.

- Monitoring health and safety performance in their departments.

- Ensuring injuries and incidents/near miss are reported and engage in their investigations.

- Ensuring all their employees are provided with the relevant Personal Protective Equipment and that they are used while on duty.

Health and Safety Committee

The committee is formed as an obligation to the OSHA Act 2007 under Sec.9. The committee members are elected by the workers in every Department for their representation.

The responsibilities of the Committee include:

- Ensuring overall safety around the workplace through conducting regular inspections around the workplace,

- Taking part in inspection, investigations and making recommendations of injuries, incidents/near miss and complaints,

- Providing relevant information on safety, health and welfare of the workers and workplace to the management.

- Training of employees as per the training programs of the Departments as a means of providing information for safety, health and welfare to the workers

- Identifying occupational hazards and cases of ill-health among workers and making appropriate recommendations to the management

- Advising on the adequacy or otherwise of safety and health measures for particular hazardous work or activities

- Maintaining effective communication channels on matters of health and safety between the management and the workers

- Organizing activities or programs for the promotion of a safety and health culture within the Departments.

First Aiders

There are trained first aiders in every department. They put on orange overalls/dust coats/reflectors for ease of identification.

their roles include:

- Attending to personal injuries by administering first-aid
- Recording of the injuries attended to in the First-aid registers
- Informing the compliance officer in case the first-aid medications are out of stock or expired
- Ensuring the First-aid boxes are well kept and the medical waste taken to the dispensary for appropriate disposal.
- Assisting with medical emergencies during an evacuation

They are:

DEPARTMENT	FIRST AIDER

Fire Marshals/wardens

There are trained fire marshals/wardens in every department. They wear red overalls/dust coats/reflectors.

Their responsibilities include:

- Ensuring that all fire fighting equipment in their departments are in good working condition, are not obstructed and are serviced quarterly
- Conducting annual fire drills at the workplace;
- Investigating fire incidences at the workplace and recommending corrective measures
- Inspecting the workplaces to identifying potential fire risks and recommend remedial measures

- Training other workers in the safe use of fire fighting equipment
- Ensuring safe evacuation of buildings and fighting of fire during fire emergencies

Employees

Every employee has the responsibility to:

- Ensuring his/her own safety and health and that of other persons who may be affected by his acts or omissions at the workplace.

- Co-operating with the management for reasons of health and safety.
- Ensuring that protective equipment provided is worn at all times at the workplace for the purpose of preventing risks to his/her health and safety.

- Reporting to the supervisor or person-in-charge any situation which he or she has deemed to be a hazard (even after correcting the situation).

- Reporting to the supervisor any incident or injury that arises or occurs in the workplace.

- Complying with all laid out regulations and policies pertaining to safety and health around the workplace.

- Practicing good housekeeping within the workplace

- Avoiding operation or interference with equipment in which they have not been duly authorized or trained to operate, maintain or use.

- Ensuring that the provided safety equipment are not misused.

Clients, Contractors and Visitors

Contractors, clients and visitors should:

- Take reasonable care to ensure their own health and safety and the health and safety of others who might be affected by their activities.

- Co-operate with the management for reasons of health and safety.

- Report to the persons-in-charge any situation which he or she has deemed to be a hazard (even after correcting the situation).

- Comply with all laid out regulations and policies pertaining to safety and health around the workplace.

3. HEALTH AND SAFETY ARRANGEMENTS

Krystalline Salt Limited will strive to establish Health and Safety Culture by the establishing and maintaining the following arrangements:

3.1. Communication and Consultation

We shall employ various means of communication of safety information which will include but not limited to direct consultation or communication through the Health and Safety Committee members, internal memos, departmental training sessions, signages , notices and the safety handbook.

All employees, clients and visitors are expected to pay attention and adhere to the signages and notice boards in their environment.

3.2. Medical Facilities

We value the health and safety of our employees and everyone within our premises and therefore we shall provide stocked First-aid boxes and trained first aiders in in every department.

We shall also maintain an in-house clinic to enable employees get treatment as well as provide a medical cover to the workers.

3.3. Fire fighting equipment and related facilities

We have provided various types of fire fighting equipment suitable for use for the identified fire hazards in our premises. There are also well marked emergency exit routes and assembly points to ensure safety of workers, clients and visitors during fire evacuation emergencies. Our priority at all times is the safety of individuals.

3.4. Welfare facilities

We adhere to the requirements of the Occupational Safety and Health Act, 2007 and Employment Act -General Rules, 2014 as minimum standards. We are committed to providing suitable and sufficient welfare facilities like:

- Sanitary facilities

3.5. Special arrangements for Vulnerable Workers

We understand that in a workplace, there are vulnerable groups of people like the physically challenged and lone workers who need special attention to ensure their safety and health. We are committed to taking the necessary measures to achieve their safety and health while on duty.

3.6. Environmental Management

We understand our responsibility in regards to environmental management and as a result we uphold good housekeeping (5S) principles in our workplaces. This is done under strict adherence to the Environmental Management and Coordination Act and its subsidiary Regulations. We shall also ensure implementation of our Environmental Management Plan as provided for in Environmental Management Policy.

3.7. Management of risks and hazards

We understand that there are various hazards within our workplaces. For us to be able to realize safety of our workplaces we are committed to:

Identifying the hazards and the associated risks by:

- Conducting regular inspection of the workplaces
- Subjecting new and even existing equipment/activities to risk assessment
- Using Manufacturers' Manuals
- Using Material Safety Data Sheet (MSDS) for substances or chemicals and
- Analyzing Injuries or near miss Data.

To control the hazards we shall apply the correct selection of technical, procedural and behavioral controls as per this hierarchy:

- Elimination/substitution

- Reduce exposure or the time of exposure

- Isolation/segregation

- Engineering controls

- Safe systems of work

- Training and information

- Personal protective equipment

- Monitoring and supervision

By identifying and controlling the hazards, we believe to prevent:

- Personal injury, ill-health or death,
- Other types of lost time incidents like near miss and property damage, dangerous occurrence and,
- The occurrence of breaches of laws and regulations which might lead to enforcement action and/or prosecution.

3.8. Provision of Safe systems of work

We shall employ various systems as below to control hazardous activities in our workplaces.

a. Standard Operation Procedures (SOP)

We shall develop SOPs for our activities and revise them accordingly to eliminate or reduce the identified hazards and minimize the associated risks. In the development of such systems, we involve all the stakeholders who are the employees and supervisors who will carry out the work.

b. Job Safety Analysis (Job Breakdown Sheet)

This involves breaking work down into a series of steps so that hazards can be identified and risk controlled at each step using technical, procedural and behavioral controls.

c. Permit To Work Systems

This is meant to control high risk activities to ensure that all the risks have been identified, all the precautions put in place and that appropriate information has been communicated to all relevant parties.

We shall use Permits to work to control some forms of hot works, work on live electrical systems, entry into confined spaces and some forms of machinery maintenance work and works at height that are highly risky.

d. Emergency Procedures

We shall put in place comprehensive emergency procedures for dealing with foreseeable incidents such as fire, medical emergencies and environmental contamination. Our emergency procedures will be designed to give warning of imminent danger and to allow personnel safely to evacuate the area.

3.9. Personal protective equipment

We understand that use of Personal Protective Equipment is the last resort in controlling hazards and associated risks. As per our PPE Issuance and Replacement Policy, all employees shall be issued with the appropriate PPE as per the hazards identified in their area of work. This is meant to protect them from the residual hazards and risks after all the controls have been implemented.

3.10. Evaluation and Monitoring

We are committed to carrying out audits, inspection and surveys within the workplace as per the legal statutory requirements. These include but not limited to:

- Occupational health and safety audit
- Risk assessments
- Fire safety audit
- Occupational medical examinations including audiometry and eye screening
- Medical examination of food handlers
- Noise survey
- Air quality monitoring
- Lifting equipment inspections
- Environmental audits
- Environmental parameters monitoring
- Other random medical examinations, surveys and audits among others.

The recommendations made from these audits/inspections and surveys shall be incorporated into the Company's Action Plan for effective implementation.

3.11. Sustainability and Supervision

The management is committed to engaging competent staff and providing appropriate training, knowledge, experience and other skills necessary for them to do their jobs safely. This is achieved through the scheduled monthly Departmental training sessions, kaizen workshops and other trainings on a need basis.

As discussed earlier, the line supervisors, Heads of Departments, Health and Safety Committee and Compliance Department have various responsibilities in ensuring safety of our workplaces and health of workers. The management shall avail all the necessary resources to enable every individual carry out their responsibilities.

3.12. Review Program

This policy shall be reviewed annually through consultation of all stakeholders.

FIRE SAFETY POLICY AND EVACUATION PROCEDURES

FIRE SAFETY POLICY

a. General Statement

Kryształine Salt Limited is a responsible employer. We take our fire safety duties and responsibilities seriously. We have formulated this policy to help us comply with our legal obligations to ensure the safety of our staff, visitors and clients under the Fire Risk Reduction Rules, 2007. These include the provision of a safe place of work where fire safety risks are minimized and necessary provisions provided to handle any eventualities. Our priority at all times is the safety of individuals.

In order to achieve the highest level of fire safety we are committed to:

1. Complying with statutory requirements as a minimum standard.
2. Assessing and controlling the risks that arise from our work activities through regular inspections and risk assessments.
3. Ensuring safe working methods and providing safe working equipment.
4. Providing effective information, instruction and training to our staff, visitors and clients regarding fire safety.
5. Consulting with employees and their representatives on fire safety matters.
6. Monitoring and reviewing our systems and prevention measures to ensure there effectiveness through fire safety audits.
7. Setting targets and objectives to develop a culture of continuous improvement.
8. Ensuring adequate fire fighting equipment exist throughout the departments.
9. Ensuring adequate resources and facilities are made available for fire safety issues, so far as is reasonably practicable.
10. Maintaining a comprehensive Fire Safety Management Procedure/Program as a standard guideline.

Signed:

(Managing Director)



Date:

09/01/19

FIRE SAFETY OBLIGATIONS AND RESPONSIBILITIES

a. Employer's Duties

As the employer, we are taking every reasonable step and responsibility to make our workplaces free from fire hazards. We comply to the Fire Risk Reduction Roles, 2007 as minimum standards.

b. Employees Duties

All employees have a duty to take reasonable steps to ensure that they do not place themselves or others at risk or harm. All employees are expected to co-operate fully with any procedures that may be introduced as a measure to protect the safety and well-being of staff, visitors and clients.

c. Responsible Persons

There are trained fire marshals/wardens in every department. Their responsibilities include:

- Ensuring that all fire fighting equipment in their departments are in good working condition, are not obstructed and are serviced quarterly
- conducting annual fire drills at the workplace;
- investigating fire incidences at the workplace and recommending corrective measures
- inspecting the workplaces to identifying potential fire risks and recommend remedial measures
- training other workers in the safe use of fire fighting equipment

Similarly, fire marshals/warden are vital in all our Departments as they have the key responsibilities of ensuring the safety of individuals in cases of fire emergencies. First-aiders also have a medical role to play during such emergencies in cases of casualties.

Below are the Departmental fire marshals, wardens and first-aiders.

Department	Fire Marshals/wardens	First-aiders
Admin		
Loading		
Garage		
Solar		
Packaging		
Plant		
Stores		
Civil		
Shamba		
Security		
MRRN Office		
MRRN Garage/store		
MRRN Security		
MRRN Shamba		

NOTE:

For occasions where fire marshals and wardens are absent, Departmental Supervisors have been allocated to all functions. However, in the event that both fire marshals and wardens are absent and the supervisors are absent too, then the Heads of Departments or Compliance Officer shall temporarily allocate the function to an alternative suitably trained member of staff.

d. Communication

All employees will be kept informed of the contents of fire safety management system and any relevant changes to the procedures through Internal Memo, induction sessions and monthly departmental health and safety meetings.

FIRE SAFETY MANAGEMENT PROCEDURES/PROGRAM

The following procedures are in place to ensure high standards of fire safety within our premises:

- Fire risk assessments and fire safety audits will be done annually and reviews done regularly on need basis.
- Fire evacuation procedure (drill) will be practised annually. A record and report of the evacuation will be maintained.
- Fire alarm system will be tested monthly from all departmental call points on the first Monday of every month.
- Training will be provided, as necessary, to any staff given extra fire safety responsibilities such as Fire Marshals/wardens after every two years.
- All new members of staff and temporary employees will be given induction training on how to raise a fire alarm and on evacuation procedures. Regular staff will be given annual refresher training during the monthly meetings.
- All escape routes and assembly points shall be clearly marked and kept free from obstructions at all times. Departmental fire marshals, safety representatives and compliance officer will inspect these areas daily.
- All fire fighting equipment and alarm system will be serviced and maintained quarterly by a qualified contractor.

- All employees will be encouraged to report any defective or missing fire fighting equipment to the Departmental Fire marshal or Compliance Officer.
- All visitors will be logged into the Visitors Book at the Main Gate on arrival on site. This will be useful during head count in case of an evacuation.
- A valid Certificate of Fire and Ambulance Services from the County Government should always be kept on site and their emergency contacts maintained in case their services are needed.

- A detailed map or diagram showing locations of fire fighting equipment, fire alarm call points, exit routes and assembly points for Plant and Packaging sections will be maintained at the Department and with the Compliance Officer
- Adequate and safe assembly points will be strategically provided for all other Departments for ease of roll call and accountability.

- Profiling of processes, Power mains and High-risk areas like gas cylinders storage and generators that MUST BE SHUT DOWN during fire

emergencies (which if left unattended, may itself constitute a fire hazard) will be done and maintained by HODs and Compliance Officer.

Emergency Evacuation Plan

If you discover a fire:

- Raise the alarm immediately. This can be done by activating the nearest Fire Alarm Call Point.
- Evacuate immediately using the nearest available safe fire exit.
- Do not stop to pick up any personal possessions.
- If you are with a visitor, ensure they accompany you.
- Assist any persons with disability to evacuate the building
- Inform the Supervisors/Fire Marshals/ Departmental Health and Safety Representatives/HOD as to the location of the fire.
- Report to the safe assembly points for a roll call.
- Do not use any fire fighting equipment unless you have been trained and it is safe to do so.
- Remain at the assembly point, return to the building only when authorised to do so.

If you hear the fire alarm:

- Leave the building immediately using the nearest available safe fire exit.
- Fire marshalls to assist staff evacuate the buildings using the safest nearest fire exits.
- Do not stop to pick up any personal possessions.
- Report to the safe assembly point for a roll call.
- If you are with a visitor, ensure they accompany you.
- HODs/Supervisors to shut down Processes, Machines or Power That Must Be Shut Down during fire emergencies, which if left unattended, may itself constitute a fire hazard.
- HOD/Supervisors to get out with the attendance registers to the assembly points for roll call.
- The Security Manager should bring the Visitor's log book to the assembly points.
- Remain at the assembly point, return to the building only when authorised to do so.

Departmental Fire Marshals/wardens – on hearing the alarm shall:

- Encourage everyone around you to evacuate as soon as possible.
- Assist the disabled and visitors out.
- Check rooms are all empty, where appropriate check toilets and close windows and doors on the way out.
- Proceed and report to Supervisors/HODs to confirm if all staff and visitors have been accounted for at the roll call.
- If any one is missing, they will re-enter the building to search again, ONLY IF IT

IS SAFE TO DO SO.

HODs/Supervisors shall:

- Use the Attendance sheets to take a roll call at the assembly points.
- Then inform to Fire Marshals/Compliance Officer if everyone has been accounted for or if anyone is missing.

Fire Alarm Status:

- In the event that the fire alarm is for a genuine fire, fire marshals will handle it after accounting for everyone and ONLY IF IT IS SAFE TO DO SO. In the meantime, all staff and visitors will be required to remain at the assembly points and not to re-enter the building until it is safe to do so.

- In the event that the fire alarm is a false alarm, then the Fire Marshals, Compliance Officer and Supervisors/HOD should establish the cause before letting anyone re-enter the building.

Contacting emergency services:

In the event that the fire alarm is for a genuine fire and it is large that it cannot be handled by the fire marshals, then the designated person must call the fire brigade as soon as possible.

The persons designated to call the fire brigade are Admin Manager, Plant Manager or Compliance Officer.

The following details will be provided to the emergency services during the call:

- Company name and location
- Nature of fire
- Fire location (specific site location of fire)
- Safest entry point
- Name of person reporting fire

Before the Fire Brigade arrives:

If there is a fire, the fire marshals can, if they have received appropriate training and if it is agreed that the situation does not place them at risk, make use of the available fire fighting equipment to put out the fire. If, at any time, they feel that the situation places them at any risk at all, they must not proceed but must wait for the Fire Brigade to arrive.

Arrival of Fire Brigade:

The Plant Manager/Admin Manager/Compliance Officer to:

- Meet them at the entrance and direct them accordingly to the point of fire
- Provide the Plant and Packaging sections map showing exit routes, locations of fire fighting equipment and high-risk areas like generators, gas cylinders storage, mini power station etc if need be.

- Provide an update on the nature of the emergency and actions taken.
- Provide details of anyone missing and where they were last seen

Control of emergency situation:

- HODs will be in control of the emergency situation at the departmental level through proper coordination with their fire marshals/wardens. The HODs will record the emergency situation at their departments and the actions taken.
- The HODs will then report to the Compliance Officer who will compile the reports from all the Departments and inform the Plant Manager accordingly.
- The Plant Manager will be liaising with Fire and Rescue services. The Plant Manager will remain in control for the overall site safety during such emergency.

ENVIRONMENTAL MANAGEMENT POLICY AND MANAGEMENT PROGRAM

1.0 POLICY GENERAL STATEMENT

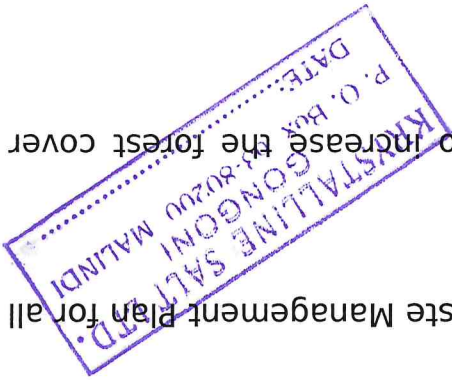
Krystalline Salt Limited recognizes and commits to protecting and managing the environment as an integral part in our business. We aim to uphold the fundamental right of every citizen in accessing a clean and healthy environment for the improvement of their well-being, through effective and sufficient environmental management systems. Our systems are incorporated to ensure safe working conditions for every employee and to uphold conformity to environmental legislations and particularly Environmental Quality Standards as stipulated by the Environmental Management and Coordination Act 1999.

In order to achieve the highest level of environmental management standards, we are committed to:

1. Meeting all legal and statutory requirement as a minimum standard.
2. Ensuring sustainable and effective management of waste through application of the waste management principles.
3. Integrating cleaner production methods in an effort to curb the production of Greenhouse Gases.
4. Promoting conservation of energy and raw materials

5. Developing and implementing a comprehensive Waste Management Plan for all our processes

6. Engaging in tree planting activities in an effort to increase the forest cover within the areas we operate in.



7. Engaging in Environmental Corporate Social Responsibility activities to improve the welfare of the community.

8. Providing training, information and education to all employees to promote and develop environmentally conscious beings.

9. Ensuring a safe and healthy working environment for all employees through the identification and management of inherent and residual hazards and risks.

10. Establishing and upholding continuous communications with employees and relevant stakeholders for purposes of reinforcing this policy.

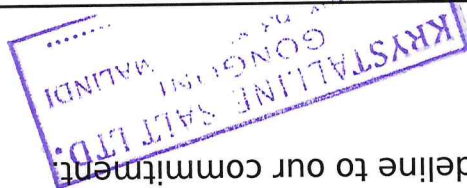
11. Setting targets and objectives to develop a culture of continuous improvement.

12. Eliminating or reducing the impacts of our activities on the environment by closely monitoring all the environmental vital indicators of change

13. Ensuring compliance to our occupational health and safety and fire safety policies

14. Ensuring adequate resources and facilities are made available as is reasonably practicable to ensure implementation of this policy.

15. Maintaining a comprehensive Environmental Management Program as a standard guideline to our commitment



Signed: _____

(Managing Director)

2.0 ORGANIZATION AND RESPONSIBILITIES

Management

The management is responsible to ensuring that:

- The right health and safety policy is put in place.
- Adequate budget is set for the implementation of the policy.
- The right organizational structure is in place for the implementation of the policy.
- Competent people are employed.
- Workers, clients and visitors comply to the set policy through visible leadership

Compliance Officers

The compliance officers are in-charge of overall environmental coordination within the company. He/she is mandated to:

- Providing advice and guidance on environmental standards as per the legal and statutory requirements.
- Ensuring complete compliance to all relevant legal and statutory requirements as required.
- Overseeing and Coordinating the various inter-departmental environmental activities and compliance related matters.
- Ensuring the regulating bodies, our partners and where necessary the local community are updated and informed on the progresses made by the company towards compliance to Environmental regulations.
- Identifying and providing instruction, information and coordinate training environmental management principles
- Promoting a positive safe and healthy environmental culture within the company.
- Developing and implementing the policy.
- Monitoring environmental performance of the company.

Heads of Departments/Supervisors /Shift in charge

These are responsible for the management of the environment within their Departments or areas of work by:

- Ensure that high standards of housekeeping are implemented within their areas of operation.
- Ensure that the environmental policy is implemented within their departments.
- Promote a positive safe and healthy environment.
- Encourage efficient resource use to minimize waste production.
- Promoting a positive healthy and safe environmental management culture.
- Taking all appropriate measures to prevent environmental degradation in their departments.
- Monitoring their environmental performance to ensure that safe environmental conditions are maintained.
- Ensuring their employees are trained as per the identified training needs.
- Ensuring environmental degradation or contamination incidents are reported and engage in their investigations.

Health and Safety Committee

The committee is formed as an obligation to the OSHA Act 2007 under Sec.9. Their responsibilities are not only limited to health and safety but also include Environmental obligations. The responsibilities of the Committee include:

- Ensuring overall housekeeping around the workplace through conducting regular inspections around the workplace,
- Taking part in inspection, investigations and making recommendations of environmental incidents and complaints within their departments,
- Providing relevant information on environmental matters affecting workers to the management.
- Training of employees as per the training programs of the Departments as a means of providing information on environmental management to the workers
- Identifying environmental hazards within their departments and making appropriate recommendations to the management
- Advising on the adequacy or otherwise of environmental management arrangements and measures for particular hazardous work or activities

- Maintaining effective communication channels between the management and the workers
- Organizing activities or programs for the promotion environmental management culture within the Departments.

Employees

Every employee has the responsibility to:

- Ensure high standards of cleanliness and housekeeping within their area of work is maintained.
- Adhere to all standards, protocols and procedures laid out in the workplace in relation to the environmental management.
- Avoid any activity that may pose environmental risk
- Co-operating with the management for reasons of environmental management.
- Reporting to the supervisor or person-in-charge any situation which he or she has deemed to be a hazard (even after correcting the situation).

- Complying with all laid out regulations and policies pertaining to environmental management around the workplace.

Clients, Contractors and Visitors

Contractors, clients and visitors should:

- Take reasonable care to ensure their activities do not cause environmental degradation or contamination.
- Co-operate with the management for reasons of environmental management.
- Report to the persons-in-charge any situation which he or she has deemed to be a hazard (even after correcting the situation).
- Comply with all laid out regulations and policies pertaining to environmental management around the workplace.

3.0 ENVIRONMENTAL MANAGEMENT PROGRAM

We commit to attaining and observing all environmental quality standards as stipulated by law. To achieve this we shall put the below arrangements in place to integrate all the environmental management components.

3.1. Waste Management

As Krystalline, we adhere to all policies relating to waste management. We are committed to eliminating waste generated from our processes, however for the residual waste we keenly implement the Waste Management Principles i.e. Reduce, Reuse and Recycle. The Environmental Management (Waste Management) Regulations of 2006 are our guidelines

Segregation: We are committed to proper segregation by provision of various waste bins strategically placed within our premises.

Reduce: We shall employ various means to reduce the amount of waste generated from our processes.

Reuse: Throughout the production phases, we shall deliberately re-use bi-products and by products to minimize wastage. These products are always useful in another process.

Recycle: The residual wastes after reduction and reuse shall either be recycled within our systems or be disposed to NEMA Licensed waste recyclers.

Disposal: For the wastes that cannot be further recovered or recycled, such we shall dispose through NEMA Licensed waste disposers

Waste Management Plan, Inventory and Tracking System

We shall develop a comprehensive waste management plan for all the wastes generated from our processes. Similarly, we shall keep and maintain records of the amount of wastes generated from the various processes. A tracking system shall also be maintained for the re-used, recycled and disposed wastes to ensure all is done in accordance to the regulations and the Plan.

3.2 Water Management

To effectively manage water throughout our processes, the available Acts and legislations regulating water use and disposal are our minimal standards of compliance. The company shall strive to:

- Invest in rain water harvesting techniques within the company.
- Conserve by monitoring water use in every sector/department
- Adopt recycling techniques for water such as use of brine in washing salt
- Increase underground water recharge by minimizing discharge and increasing land cover
- Promote a conservation culture among employees
- Monitor the quality of water regularly

3.3 Air Quality Management

We shall adhere to the Environmental Management (Air Quality) Regulations by ensuring:

- Prevention of air pollution by employing scrubber systems in our chimneys
- Use cleaner forms of sources of energy
- Conducting regular monitoring of air quality, stack emissions and dust to ensure that they conform to the stipulated standards.

3.4 Soil Quality Management

We shall conduct periodic testing and analysis of soil within and away from the salt works. This shall form part of the parameters we use to monitor the impacts of our activities on the environment.

3.5. Cleaner Energy Initiatives

Climate change is a continuous emerging issue in our global society. As part of the Climate Change Act, 2016, we aim to reduce our carbon footprint and contribute to the global commitment of reducing global warming. This we shall achieve through:

- Incorporating green energy in our production cycle.
- Adopting recycling techniques to minimize on waste production.
- Promote afforestation activities through out-grower programs

- Encourage landscaping activities within the company for both environmental and aesthetic purposes.
- Invest in cleaner energy facilities like solar systems
- Promote use of cleaner energy facilities among our employees e.g by gifting our staff with energy saving jikos and solar lamps.

3.6. Housekeeping

As part of our culture, we shall commit to the 5's strategy to improve and sustain housekeeping within our departments. We shall ensure that high standards of general cleanliness are conformed to within each department.

Further, we shall:

- Provide suitable and sufficient dust bins at designated areas within our premises
- Ensure that waste is collected and disposed as per the Waste Management Regulations, 2006
- Ensure our workplaces are kept clean and in orderly manner at all times without obstructing exit routes and the provided safety equipment.
- Ensure our premises are fumigated regularly to control pests, insects and birds.

3.7. Evaluation and Monitoring

The company's administrative structure shall provide an internal control mechanism to identify and mitigate activities that are prone to cause negative environmental impacts. This is done through conducting periodic evaluations within our premises. Aside from the internal controls, we shall also comply to all the legal means of monitoring environmental parameters which include but not limited to;

- Annual Environmental Audits
- Environmental Impact Assessments and Initial Audits for new projects
- Occupational Safety and Health Audit
- Fire and Safety audit.
- Risk Assessments.

The recommendations made from these audits/inspections and surveys shall be incorporated into the Company's Action Plan for effective implementation.

- Noise Survey.
- Effluent and soil Analysis
- Ambient air quality monitoring
- Ground water monitoring

3.8. Use of Personal Protective Equipment

We understand that use of Personal Protective Equipment is the last resort in controlling hazards and associated risks within our environs. As per our PPE Issuance and Replacement Policy, all employees shall be issued with the appropriate PPE as per the hazards identified in their area of work. This is meant to protect them from the residual hazards and risks after all the controls have been implemented.

3.9. Community Welfare

We recognize the fact that our operations have an impact within the communities we operate within. We are committed to developing strong relationships with the local communities. We shall remain sensitive to the needs and concerns of local communities and other stakeholders.

To achieve this, we shall:

- Encourage the participation of local communities through the Corporate Social Responsibility Committee and even the entire community prior to commencement of new projects through EIA

- Develop and maintain community relations management procedures and channels through the CSR Committee and KAM Liaison Office

- Initiate Corporate Social Responsibility projects that will benefit the local community environmentally and improve their welfare

- Impact positively on the lives of the locals by promoting enhanced business opportunities, work skills and increased awareness of local community and cross cultural issues.

3.10. Communication and Consultation

We value communication between the management, the employees, local community, visitors, contractors and clients.

We shall employ various means of communication which will include but not limited to direct consultation or communication through the Health and Safety Committee members, CSR Committee members, stakeholders consultation forums, internal memos, departmental training sessions, signages , notices and handbooks.

All employees, clients and visitors are expected to pay attention and adhere to the signages and notice boards in their environment.

3.11. Sustainability and Supervision

The management is committed to engaging competent staff and providing appropriate training, knowledge, experience and other skills necessary to ensure sustainability of milestones achieved. This is achieved through the scheduled monthly Departmental training sessions, kaizen workshops and other trainings on a need basis.

As discussed earlier, the line supervisors, Heads of Departments , Health and Safety Committee and Compliance Department have various responsibilities in ensuring implementation of this program. The management shall avail all the necessary resources to enable every individual carry out their responsibilities.

3.12. Review Program

This policy shall be reviewed annually through consultation of all the stakeholders.