BLACK WOLF
HEALTH, SAFETY AND ENVIRONMENT (HSE) POLICY

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Abstract

This Document must be read only by all involved parties and implement its Protocols & Procedures accordingly

General Manager

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1. Policy Statement

Black Wolf Company for Security & Personal Protection Services Ltd. is committed to protecting the health and safety of employees, clients, contractors, visitors and other persons affected by our activities, while preventing pollution and reducing adverse environmental impact. HSE considerations are integrated into planning, mobilization, daily operations, supervision and management decision-making.
The Company will comply with applicable laws, contractual requirements, client HSE rules and relevant industry standards. Where requirements differ, the stricter reasonable requirement will be followed unless prohibited by law.

2. Purpose, Scope and Objectives

This policy establishes the Company-wide framework for HSE management across offices, operational facilities, training locations and field projects. Project-specific HSE plans, procedures, risk assessments and client requirements supplement this policy.

- Prevent injuries, occupational illness, unsafe conditions, environmental incidents and property damage.
- Identify hazards early, assess risk systematically and reduce risk to an acceptable level using the hierarchy of controls.
- Maintain competent personnel through induction, job-specific instruction, quarterly awareness and refresher training.
- Promote open reporting, employee participation, Stop Work Authority and timely corrective action without retaliation for good-faith safety concerns.
- Measure HSE performance, maintain reliable records and continually improve the HSE management system.

3. Leadership, Roles and Responsibilities

The General Manager has overall and final accountability for HSE performance and ensures that adequate authority, resources and management attention are provided.

The HSE Officer is responsible for coordinating and administering the Company HSE management system. Key responsibilities include:

- maintaining risk assessment forms, risk registers and HSE records;
- assigning and controlling unique Risk IDs for recorded hazards and risks;
- coordinating HSE inspections, audits, corrective actions and performance reporting;
- conducting and recording quarterly HSE awareness sessions across Company offices and designated critical projects;
- supporting JSA/JHA implementation, incident investigations, emergency preparedness and environmental controls; and
- advising management and Operations on applicable HSE requirements and improvement priorities.

Heads of Department, managers, supervisors and project/site leaders are responsible for applying this policy in their areas, ensuring work is properly planned and supervised, confirming required JSA/JHA and PPE controls are in place, and escalating unresolved risks.

All personnel must follow HSE requirements, attend required training and briefings, use assigned PPE correctly, report hazards, near misses and incidents, use Stop Cards where appropriate, and stop or refuse work when they reasonably believe an imminent or uncontrolled serious danger exists.

4. HSE Risk Management and Contract Planning

Black Wolf will maintain a documented HSE risk management system covering hazard identification, risk assessment, control, review and close-out.

- Risks and hazards are recorded through approved risk assessment forms and risk registers. The HSE Officer assigns a unique Risk ID to each registered risk/hazard to provide traceability between the source, assessment, controls, actions and review status.
- Risk assessments use a defined risk-rating methodology and the hierarchy of controls. Actions are assigned

to responsible persons with target dates and are tracked to closure.

- Risk registers are reviewed periodically and whenever there is a significant incident, change in work activity, change in location, new equipment, new client requirement or other material change in exposure.
- Before execution or mobilization of each new contract/project, Black Wolf will review the scope of work, location, client HSE requirements, personnel, equipment, journeys, emergency arrangements and foreseeable hazards. Identified risks will be assessed and addressed before work starts, with project-specific HSE plans, bridging documents or additional controls developed where required.

5. Job Safety Analysis / Job Hazard Analysis and Pre-Work Controls

Job Safety Analysis (JSA) / Job Hazard Analysis (JHA) is a core field control. Black Wolf will maintain JSA/JHA sheets for all field positions and the routine activities associated with those positions.

- A relevant JSA/JHA is reviewed with personnel before work begins and is updated when conditions, methods, equipment or hazards change.
- Task-specific JSA/JHA is required for non-routine, higher-risk or unfamiliar activities and whenever project/client rules require it.
- Toolbox talks and pre-work safety meetings are used to communicate hazards, controls, lessons learned and changes in conditions.
- Where applicable to the worksite, permit-to-work, lockout/tagout, hot-work, confined-space, lifting, working-at-height, chemical and other site-specific control systems will be followed.

6. Hazard Reporting, Stop Cards and Stop Work Authority

Black Wolf expects hazards to be identified and reported before they result in harm. Every field employee will be issued or assigned a Stop Card / Hazard Observation Card for reporting unsafe conditions, unsafe acts, near misses, good catches and other hazards observed during work.

- Personnel complete a Stop Card whenever a relevant hazard or safety observation is identified and submit it through the site supervisory/HSE reporting channel.
- The HSE Officer reviews submitted cards, records significant hazards in the risk management system, assigns a Risk ID where required, and tracks corrective or preventive actions to closure.
- Personnel have Stop Work Authority and may stop or refuse work where an activity or condition presents an imminent or uncontrolled serious risk. Work resumes only after the concern is assessed and adequate controls are confirmed.
- Good-faith reporting and use of Stop Work Authority will not result in retaliation.

7. Training, Awareness and Competence

Black Wolf will ensure that personnel have the HSE knowledge and competence required for their assigned roles.

- New employees receive HSE induction covering Company HSE policy, responsibilities, hazard reporting, PPE, emergency arrangements, incident reporting and safe working practices.
- Site/project-specific induction and job-specific HSE instruction are provided before personnel perform relevant work, including hazards and control measures associated with the task and location.
- The HSE Officer conducts quarterly HSE awareness sessions across Company offices and critical projects. Topics may include HSE policy, hazard identification, JSA/JHA, PPE, emergency response, incident and near-miss reporting, Stop Cards, environmental responsibilities and safe workplace practices.
- Specialized training is provided according to role and risk, including as applicable defensive driving, first aid, weapon safety, fire and evacuation, PPE, security procedures and other client/project-specific requirements.
- Training attendance, assessments, certificates and refresher requirements are documented and retained.

8. PPE, Equipment and Safe Working Conditions

Black Wolf enforces the use of suitable Personal Protective Equipment (PPE) across all projects in accordance with identified risks, applicable standards and client/worksite requirements.

- Required PPE is provided, inspected, maintained and replaced when damaged, worn, expired or otherwise unserviceable.

- Supervisors verify PPE compliance and address non-compliance promptly. Repeated or deliberate breaches may lead to corrective or disciplinary action in accordance with Company rules.
- Vehicles, tools, emergency equipment and other work equipment are subject to appropriate inspection, servicing and maintenance. Maintenance and inspection records are retained where applicable.
- Workplaces and work areas are maintained in a safe, orderly and hygienic condition, with appropriate welfare, first-aid and emergency provisions.

9. Incident Reporting, Investigation and Emergency Preparedness

All injuries, illnesses, accidents, near misses, fires, spills, unsafe conditions and other HSE incidents must be reported promptly through the established reporting line. Incidents are investigated to identify causes, contributing factors and preventive actions, with findings communicated to relevant personnel.

- Corrective and preventive actions are assigned, tracked and verified for effectiveness.
- Lessons learned are communicated through briefings, toolbox talks, quarterly awareness sessions, notices or targeted retraining as appropriate.
- Black Wolf maintains emergency and contingency arrangements appropriate to its offices and projects, including fire, medical emergencies, security/social unrest, vehicle incidents, equipment failure and environmental releases.
- Project emergency plans include current emergency contacts, communication arrangements, evacuation/medevac arrangements and drills where required.

10.Journey Management, Occupational Health and Fitness for Work

- Road-risk controls include competent and appropriately licensed drivers, defensive-driving training where required, journey planning, vehicle checks, maintenance, monitoring of driving performance, speed controls and compliance with road-safety rules.
- Working hours and fatigue are managed so personnel receive adequate rest and are fit to perform assigned duties safely.
- Personnel are expected to report fitness-for-work concerns that may create a safety risk. The use, possession or being under the influence of illegal drugs or alcohol while working or on duty is prohibited.
- Where work may expose personnel to chemical or physical agents, the hazards will be assessed and appropriate controls, information, health surveillance or exposure monitoring will be arranged where required by risk, law or client requirements.

11.Environmental Management

Black Wolf will conduct its activities in a manner that prevents pollution, minimizes waste and uses resources responsibly.

- Waste is identified, segregated, handled, stored, transported and disposed of in accordance with applicable requirements. Environmental inspection and disposal records are maintained where applicable.
- Spills and environmental releases are reported, contained and managed promptly, with preventive actions taken to reduce recurrence.
- Chemicals and hazardous substances are identified and assessed before use. Personnel are informed of relevant hazards through induction, toolbox talks, labels, safety data information and task-specific controls as appropriate.
- Energy, water, fuel and other resources are used efficiently where reasonably practicable.

12.Subcontractors and Third Parties

Before engagement, subcontractors performing work for Black Wolf are assessed in proportion to the HSE risk of the work. The assessment may include HSE competence, qualifications, training records, incident history, procedures and previous performance.

Applicable HSE requirements are communicated through contracts, induction, risk assessments, site rules and supervision. Subcontractor HSE performance is monitored through inspections, observations, audits and corrective actions as appropriate.

13.Monitoring, Audit, Performance and Records

HSE performance is monitored through inspections, audits, observations, risk reviews, incident analysis, training records, Stop Cards and corrective-action tracking. The HSE Officer coordinates a risk-based inspection and audit programme appropriate to Company operations and project/client requirements.

- Performance indicators may include incidents and near misses, inspection/audit findings, training completion, PPE compliance, Stop Card/hazard reports, corrective-action closure, journey/vehicle safety indicators and environmental findings.
- Findings are reported to responsible managers and communicated to affected personnel. Significant or recurring issues are escalated to senior management.
- Health performance is supported by relevant medical/fitness records and health incidents; environmental performance is supported by inspection, waste/disposal and environmental incident records.
- HSE records are retained under the Company document-control system and made available for internal, client or regulatory review when required.
- Senior management and the HSE function formally review HSE performance at least annually, with additional reviews following significant incidents, major operational changes or important audit findings.

14.Communication, Consultation and Document Control

HSE information is communicated through induction, quarterly awareness sessions, safety meetings, toolbox talks, notices, direct supervision, reports and management reviews. Employees are encouraged to raise concerns and make HSE improvement suggestions.

Policies, procedures, risk assessments, JSA/JHA forms, registers, reports and related HSE documents are developed, reviewed, approved, distributed and retained through the Company document-control process. Current versions are made available to personnel who need them.

15.Non-Compliance and Corrective Action

Unsafe acts, breaches of this policy, failure to use required PPE, failure to report incidents or deliberate disregard of approved controls will be addressed promptly. Depending on severity, actions may include immediate correction, retraining, reassignment, suspension of work, formal corrective action or disciplinary measures in accordance with Company procedures and applicable law.

Yad Mohammed Rashid
General Manager