Sample: Safety & Security Policy

1. Safety Issues

a) Workplace and Event Site Safety

Safety at the Company workplace and event sites must be maintained to ensure that our already good safety record is upheld. The concept of 'active intervention' by all staff when a safety deficiency is observed is to take effect immediately and be maintained at all times. Using this concept, staff members should intervene immediately when they observe a workplace defect or event site safety fault or a situation where worker or customer safety or accident exposure exists.

All employees are empowered to bring activities to a stop, change or correct the unsafe situation before normal activity can resume. This must apply not only to office situations but also to onsite activities, during tours at event sites, in particular at locations where Company is the project manager.

In this manner, a safety-first culture must be embraced with all staff as well as vendors for Company projects and events. Pre-event planning, discussions, evaluations and briefings should be conducted so as to ensure that decision-makers in vendor organizations are aware of Company's expectations in advance. It is the responsibility of Company's project managers to implement full safety policies throughout tour or event activities. Particular emphasis should be given to trip hazards, electric shock exposure, taping of cords and stairway handrails, proper lighting touring exposure.

In addition to the above, customer safety policies must be observed and, where appropriate, incorporated into plans. The topic of 'on tour' and event site safety should be covered during site inspections and during pre-event briefings during the deployment process. The senior Company manager or project manager onsite must take the lead with regard to safety issues.

Appropriate safety gear (safety shoes, goggles, hard hats) must be utilized on all occasions when prop and staging construction is underway. Management must review safety plans for all events prior to deployment. All permits necessary should be secured for construction, before the event can take place.

i) Passenger/Participant Safety

Passenger/participant safety must be paramount when guests are on tour. Mandatory assistance must be provided when guests are alighting from vehicles, boats and other transport. Supervision and assistance must be in place where any exposure to danger exists.

Specific issues are identified below:

ii) Operator Qualifications

Company will work closely with all vendors to insure that a culture of safety is inherent in vendor policy and that this is carried to the frontline. This applies to all personnel who operate Company chartered vehicles; who should be of good moral and civil character and should possess a current license to operate their equipment <u>and</u> if required a separate permit to operate the equipment for public hire. After selection, driver training and retraining is essential.

iii) Vehicle Safety

Vehicles used by Company and supporting vendors should be subjected to the highest scrutiny for safety compliance and to avoid vehicle accidents involving Company personnel and customers. Vehicles should be of a recent model year, be licensed as a vehicle for tourist transport, properly maintained and regularly inspected, not less than daily by operators.

Vendors who supply vehicles have been selected to ensure that they comply with and most frequently exceed government regulations. This includes the installation of first-aid kits and safety equipment in all vehicles fire extinguishers in vans and buses. The installation and use of seat belts at each seat is mandatory in vehicles hired for customer use. Drivers of vehicles should instruct their passengers to use and fasten seat belts during vehicle use, prior to vehicle movement. Driver compliance is mandatory.

iv) Seat Belts and Child Seats

In some cases, 3rd party owned vehicles do not have seat belts installed in all seats. In these cases, the 1st row of seats (behind the drive and the front entry door) should remain vacant. When there is a 2nd door at the mid-coach, the same applies for the two seats at this location. Where appropriate, child seats and restraints should be utilized for FIT/Leisure services. These seats should comply with EU regulations and be installed for family use when appropriate.

v) Specific Situations

Use of Local Transportation

The use of traditional transportation such as native boats, pedicabs, tuk-tuk, cyclos and trishaws is a unique part of the Asian scene. These are often planned in programs to allow participants to experience local color from arms-length perspective. Frequently, these mode of transport do not comply with standard safety norms and are inherently more dangerous than normal transport.

a) Local-style taxis, native boats, travel by horseback or mule

It is the responsibility of Company to ensure that the use of this type of transportation is completed as safely as possible and without incident. Vendors in this sector should be selected carefully ideally with the backing of some kind of association (such as trishaws, pedicabs, cyclos) and with some kind of insurance in place. Where this does not exist, special insurance should be sought to provide adequate coverage for both Company and the end-users/customers.

b) Boats and Lifejackets

In the case of boats there is additional risk where guests may trip and fall into the water or where they can become injured or incapacitated. Great care should be applied for any water transport, particularly on local boats, normally patronized by local citizens where foreigners may be unfamiliar.

In <u>all</u> cases where boats are utilized, large and small, lifejackets must be onboard in the event of mishap. A safety briefing should be provided by either boat personnel or Company guides or staff who should accompany journeys. A simple briefing is all that is required to explain the use of lifejackets and further, what to do in the event of boat mishap.

Under no circumstances should any journey involving deep water be allowed where no lifejackets are provided. It is incumbent upon Company personnel to take a very proactive role in the event of mishap including plunging into the water to save an individual if needed.

Destination project staff members are responsible for reviewing these situations with customers in advance in order that they will be aware of situations before they arise.

vi) Person-in-Charge for Company

Project management or operations personnel must ensure that vehicles utilized for Company customers comply with or exceed local regulations and Company's safety expectations" as outlined above. Vehicles should be visually inspected before boarding and rejected if any safety equipment or the onboard AV system is missing or inoperable.

vii) Spot Checks

Company's supervisors or vendor personnel must conduct spot checks on a regular basis. This applies to premises of vehicle suppliers, event venues, sightseeing attractions and restaurants. Insurance policies should be checked and license check to ensure validity.

viii) Large Movement Deployments

When planning for large scale events, vehicular safety should be discussed utilizing criteria outlined above including the issue of appropriate travel routes to and from hotels, event venues, airports, etc. Emphasis should be placed on the use of 'approved routes' <u>only</u> for vehicle travel. Additional safety precautions may be appropriate depending on the country and city where the event will take place. An assessment should be made and mitigating plans put in place for all low light and night time operations and venues. Adequate temporary lighting and torches should be supplied when needed.

c) Transport Safety - Operating Equipment in Safe Conditions

An important feature of transport management is managing vehicle and local speed. Under no circumstances should vehicles exceed local speed limits regardless of road conditions. Local speed limits have been set by competent government authorities and these should be adhered to in all cases. There is no justification for exceeding speed limits as this provides for exposure of staff and the company to injury and as a result litigation for negligence.

d) Workplace and Event Site Safety

i) Workplace

Workplace safety should be paramount in the thinking of all staff on a daily basis. The topic of safety should be considered with daily activities in mind. All premises should be inspected for trip hazards, exposed and un-taped wires, recently mopped floors, open electrical cabinets, etc.

All safety devises such as fire extinguishers should be inspected regularly, kept current. Fire drills should be conducted monthly with an agreed meeting point identified. Where appropriate, earthquake and tsunami risk should be considered

A senior executive is appointed as the workplace safety officer at each office in Malaysia and the individual responsible for ensuring that safety hazards are not allowed to exist.

Event Site

At event sites, the account manager and division head are responsible for workplace safety. Safety planning should be incorporated from first concept to event completion. Likewise, safety issues should be considered from the point where programs are planned and purchased and delivered.

iii) Tour Programs

Great care should be taken in designing tour programs, sightseeing tours and other optional activities that have any inherent risk. Guide should be instructed (see point v below) on general safety and preparing customers for unique situations onboard the coach before alighting.

When passengers disembark from motor coaches, they should be assisted by guides and motor coach operators who should position themselves at doors to assist passengers in alighting and reboarding.

Where guests are to be escorted by guides and an interpretative talk at site, guides are to ensue passengers are under control, supervised and informed of hazards.

Where passengers are directed to visit independently, they should be advised of any risk that exists at that given site.

iv) Executive Responsibilities

Likewise, the General Manager, and her deputies are responsible for safety compliance both in the Company office and at event sites. This responsibility is delegated to account managers who are responsible for supervising the delivery of specific tours and events and they <u>must</u> conduct safety planning and discussions as part of a regimen of plans of all HSSE areas during planning stages, prior to event, during and following event activities.

v) Role of Guides

Guides are the frontline representatives of Company when conducting a tour or enrooted to an event site. They are selected on the basis of their knowledge and their ability to conduct customers to ensure their safety while on tour. The employment terms ranges from company employee to individual hired on a project basis, either regularly or occasionally. Each program or tour should include a 'guide's briefing' to instruct guides regarding any unique security issues. In turn they should be advised to inform customers about any risk areas to come. Guides should be instructed to carry out the briefing responsibilities mentioned in this section and others in this document.

When an incident takes place, guide should be instructed to immediately contact the office or responsible personnel at Company for assistance. Guide should have in his/her possession local contact telephone numbers of operations and GM/MD/personnel who can be deployed at short notice to assist in managing a situation, assisting customers, etc.

Guide should react instantly in the event of injury, placing emergency calls, assisting passengers and working together to resolve situation at a frontline basis. In the event that the guide is injured or incapacitated, the coach operator must also be briefed to immediately make contact with Company personnel to seek assistance.

e) Insurance Coverage

Appropriate insurance coverage is maintained for all activities including vehicles, events, Company premises and external sites. Third party liability insurance is covered at the rate of US\$5 million, which is managed by the Company office through our insurance carrier. Copies of this policy are to be maintained in the office.

Appropriate vehicle and passenger insurance coverage is managed in each location and insurance coverage should meet minimum corporate standards that will be reviewed from year-to-year. Insurance coverage for third party vendors of all kinds should be reviewed not less than once every six months. Copies of insurance policies of company-owned and hired equipment (of all kinds) are to be maintained both within the equipment and at the office. These should be reviewed not less than once each year and sample copies of insurance policies be secured from all major vendors to ensure compliance. Appropriate values, validity period and name of insured must be shown on cover notes. Copies of policies in the English language should be secured.

f) Annual Insurance Review

An annual insurance review is conducted at each location by the COO to ensure that insurances are adequate to meet requirements and broad enough to cover all situations. Given the nature of some of our event venues, special consideration should be given to locations where exposure such as trishaws, pedicabs, native boats, unregistered transport, etc. Health, Safety, Security & Environment, Risk Assessment and Vendor Sourcing Policies will be reviewed at this time.

g) Customer Release Form

In the event of planned strenuous activities where some physical danger could occur, a 'release' form should be prepared and signed by each customer. The need for this form should be explained in the proposal and again in detail to each participant. This should include information on the risks and a description of the safety equipment (if appropriate) that would be utilized. Company's direct customer should receive an advance briefing.

h) High Risk Activities

Customer companies of Company should be encouraged to avoid typically dangerous (historically) activities in the region, which include hot-air ballooning, jet-skis by non-licensed vendors, Para-sailing (of any kind), bungee jumping (at any venue) and the use of any programs involving scuba equipment and activities except under carefully supervised conditions where licensed operators are present, with adequate insurance and where a decompression chamber exists in the locale nearby. All of these must comply before Company companies can utilize these services. Prudent and candid communication with the customer decision-maker and/or end-user is paramount.

In the case of liability limits of local vendors, Company personnel must be aware of them and local management must determine if these liability limits are appropriate. Vendors should not be utilized where liability limits are too low or where safety equipment is not present. The topic of vendor appropriateness should be covered in the annual review mentioned in item 'e' above.

Security Policy

1. Overview

The rise of terrorism has created new requirements in the travel, meetings and special events industries for enhanced security. The responsibility for security both in the office, at hotels and at event sits is largely the owner of these facilities. Only the appointed DMC has a multiple view of all aspects of a project or customer visit from the airport to hotel to event venues and return to the airport once more. While the DMC is not responsible for all aspects of the transaction, it is the responsibility to oversee and advise customers in all aspects of security, both positive and negative. Company personnel must manage these responsibilities in close consultation with the various parties.

2. Office Security

Company offices will be secured and accessible only by authorized employees. They will have access card and key locks to ensure that the wide variety of items contained in the office are not viewed, pilfered or damaged by unauthorized individuals.

Likewise, the entire offices where Company is located should be secured so that the staff members who need to work after hours are provided with adequate security by police and/or security personnel. Staff members should feel comfortable traveling to, arriving and departing from Company offices at any hour.

Within the office security procedures should also be extended to sensitive files and customer information should be protected during visits of outsiders such as representatives from hotels, venues and activity sites. Overnight, sensitive files should be packed and locked away to ensure that they do not invite investigation by other staff members, cleaners and any unauthorized person.

Computers, hard-drives, back-up drives should be provided adequate security for Company's data which should be both backed-up regularly (ideally daily) in a restorable means. These hard - drives should have off-site back-up capabilities with media taken off-site storage activated, at least once each week, ideally twice weekly. Customer's sensitive data should be secured prior to and during programs and should be deleted at program's end.

3. Risk and Threat Assessment of airports, hotels, event venues, convention centers and other sites contracted

Customers expect Company to be fully informed on the risks in their areas and communities. This applies to the full range of facilities mentioned above, in particular where the use of these facilities is contracted through Company. We may be called upon from time-to-time to conduct a risk and threat assessment either for our customer or our customer's end-users.

It is important that our responsibilities of due diligence, duty of care and concern for our staff and customer's wellbeing is well managed. It is essential that we highlight any concerns with any facility, venue or activity that we will engage for our customers. Some locations have natural exposure (many entrances, many exits) accessible to public streets and roads, etc.

During the site inspection or pre-operation process, these issues should be discussed by Company personnel with their program counterpart and, if needed, with the end-user/customer. Some locations and destinations have more serious problems and these may require special assistance of paid security personnel, police, etc.

4. Security of Hotels and Event Sites

a) Hotels

Where Company either engages the hotel or is managing the site on behalf of the customer, Company personnel must be responsible for onsite security for equipment (computers, printers, technology equipment, etc.) as well as for intellectual property onsite. This includes the proper handling of materials from arrival to departure and/or in the case of disposal at a site the customer is satisfied with their own expectations. This may involve extra security in the form of shredding of documents, secured disposal, etc.

Hotel personnel typically include a security section and these individuals should be engaged and involved in the plans for the group and bear their responsibility for onsite security. In all cases, these individuals should be responsible for perimeter security in the conference hall and lock down of these facilities either during lunches and breaks or overnight. Company personnel should ensure that these procedures are followed and spot-checked on hotel room security after hours.

b) Event Venues

Event venues are of particular concern because they are typically in areas that are open to the public or partially so. This means that some security regime must be factored into event plans by engaging in a security dialogue with the property owner, restaurant owner or event venue owners, etc. If none of these have that capability, then, Company is the organization with primary responsibility. Company staff should be proactive and the customer should be advised regarding any risks and if necessary arrangements are to be made for paid security personnel or at the very least Company staff should well observe and restrain outsiders and intruders from penetrating the perimeter of an event.

Once more, due diligence practices are as important as our duty of care and responsibility to our customers. The customers may takeover this responsibility and absolve us from further obligations. If this is a shared responsibility, the duties should be identified early and contained in necessary documentation, cost and invoices.

5. Working with Local Police, Security Agencies and Security Providers

In the case of large events, it would be necessary to communicate with and sometimes engage local law enforcement to assist with traffic direction (either for free or at a cost), by providing access/direction for motor coaches and vehicles into special event sites. This liaison is charged for and it is often very time consuming to complete. When security personnel are engaged for a specific location, then Company will do so to meet customers' expectations and at a coordination fee if appropriate.