

## STAKEHOLDER ID, COMMUNICATION & CONSULTATION GUIDELINES

### 1. PURPOSE

The purpose of this procedure is to outline how internal and external communication is organised as well as the provisions for consultation and participation in relation to HSEQ matters.

### 2. INTERNAL COMMUNICATIONS

Internal communication relating to the Management System, HSEQ and Operational topics from management to the workforce will be achieved through a variety of the following mediums:

- Induction and HSEQ training
- Email notification
- Notices displayed on notice boards
- Weekly operational meetings
- Bi-Monthly Management Meetings (as a minimum)
- Quarterly Management Review Meeting
- Monthly HSEQ Meetings – involving member of each department on a rotational basis
- Via safety representatives and observation card system
- Other meetings or briefing sessions as necessary

Workers can communicate directly with management on issues relating to HSEQ at any time in person, by telephone, through email or via the safety representative. Such communication will be noted and action taken as necessary with feedback to the relevant employees or workgroups.

### 3. EXTERNAL COMMUNICATIONS

The Safetyspear website and various social media sites (e.g. LinkedIn) are the main sources for communicating with external interested parties and include information such as the history of the Company, associated certifications, and the various services and products the Company offers.

Any person visiting a site under the control of Safetyspear shall be provided with an induction which includes and introduction to the Company and the various site rules that must be adhered to. It may be necessary to communicate with third parties from time to time on specific issues relating to HSEQ. Third parties may include enforcing authorities, clients and contractors.

#### • Enforcing Authorities

Information such as accidents and incidents may require to be shared with enforcement authorities such as SEPA and the Health and Safety Executive (HSE). In such instances, the Executive Management Team (with guidance from the HSEQ Manager) are responsible for the communication, and any information shared must be accurate and a record must be kept. The Executive Management Team must be consulted prior to any external communications to enforcing authorities, general public or press.

In instances where communication is received from enforcing authorities, it shall be brought to the attention of the Executive Management Team. All instances will be handled on a case-

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by-case basis and any sensitive information will be stored appropriately with restricted access.

- **Clients**

Information such as risk assessments, safety data sheets and hazards associated with Starn Group activities may be requested by clients. Information relevant to the work scope shall be communicated to the customer so that Starn Group can demonstrate control of risk associated with the work activities. This will also allow the client to be fully informed and communicate with their own staff and other contractors. Any accidents or incidents occurring on a client's premises shall be reported to the client and records shall be kept.

The Improvements procedure shall be followed for handling any negative feedback / communication received from clients or third parties and the Master Action List shall be used for logging actions through to completion.

- **Contractors**

Safetyspear shall ensure two-way sharing of information relating to HSEQ between themselves and any contractors. This will ensure that both parties are fully aware of the risks and controls associated with work to be undertaken. Any information received from contractors shall be brought to the attention of the relevant manager and distributed to relevant personnel as required.

#### 4. CONSULTATION

Safetyspear shall consult with workers on the following:

- Establishing the HSEQ Policy
- Determining the needs and expectations of interested parties
- Establishing HSEQ objectives and planning to achieve them
- Determining what needs monitored, measured and evaluated
- The introduction of new equipment or systems of work which may substantially affect the health and safety of workers
- Information relating to hazards, risks and controls
- The planning and organising of HSEQ training
- New technology which may have HSEQ consequences
- Arrangements for competent advice relating to HSEQ requirements
- Ensuring continual improvement

Consultation shall take place, as appropriate, through monthly HSEQ meetings, informal conversations, town halls, via safety representative, and through use of the Observation Card System.

Starn Group shall provide the mechanisms, time, training and resources for effective consultation and participation, and shall remove, or minimise any barriers to participation. The induction process will be utilised to identify any individual barriers that there may be and thereafter it will be continually monitored through the identified platforms (e.g. Observation Card System; Safety Representative; Non-Conformance System etc.).

## **5. PARTICIPATION**

Safetyspear promote and encourage worker participation in HSEQ activities. Where appropriate, workers will be expected to participate in the following:

- Establishing Policies and Objectives
- HSE hazard identification
- Fulfilling legal and other requirements
- Assessing risks and opportunities
- Determining actions to eliminate hazards and reduce risks
- Determining competence and training needs / requirements
- Review of procedures and controls
- Incident investigation
- Monthly meetings
- Site inspections and audits
- Emergency response drills
- Communicating with and monitoring activities conducted by contractors under the control of Starn Group

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**6. COMMUNICATIONS MATRIX**

The following matrix defines the different types of internal meetings within Safetyspear:

			Attendees	Exec. Mgmt. Team	HSEQ	Line Mgmt.	Workers	Output of Meeting
Meeting Type	Content	Frequency						
Management Review	Objectives; Incidents & Accidents; Performance; KPIs; NCs; Legal & Other Requirements; Changes to System; Improvements etc.	Quarterly		X	LEADS			Report and Minutes; Actions raised via MAL
Management Meetings	Commercials; Forecasting; Compliance; Business Development; HSEQ; Business Risks; risk & opportunities	Minimum Bi-Monthly		LEADS				Report; Actions
Business Risk; Opportunities; Interested Parties	Business Risk Register; Opportunities; Interested Parties – compliance; communication; performance	Minimum 6-Monthly		LEADS	X	Opt		Business Risk Register; Minutes of Meeting
HSEQ Meeting	Incidents; Audits and NCs; Risk Management; Observation Cards; Objectives; Risks and Opportunities; Changes; feedback	Monthly		Opt	LEADS	X	X	Report and Minutes / Actions
Safety Representatives	Incidents; Audits and NCs; Risk Management; Observation Cards; Objectives; Risks and Opportunities; Changes; feedback	Monthly			LEADS	Opt	X	Report and Minutes / Actions
Project Meetings	Project Specific	As required		X	Opt	LEADS	X	Information
Operations Meetings	Operations; Projects; Upcoming Work; Opportunities and Concerns	Weekly		Opt	Opt	LEADS	X	Actions / Assigned Responsibilities
Town Hall	Business Update; Review of Performance; Department update	6-Monthly		LEADS	X	X	X	Information

The matrix above is intended only to highlight the meetings that take place on a regular occurrence. There may be some instances where meetings are held weekly rather than monthly depending on operations and outstanding issues. Where appropriate, minutes from meetings will be distributed to attendees and to the wider public. The Master Action List (MAL) is the main forum for logging and tracking actions to completion – this document is available for all Starn Group personnel to view.