



HEALTH AND SAFETY MANAGEMENT AND REPORTING STRATEGY GUIDELINES

for Redefine as the **PROPERTY OWNER***
*not as the **EMPLOYER**

THE PURPOSE OF THE HEALTH AND SAFETY STRATEGY IS TO:

- Ensure that all Redefine employees are enabled to act reasonably with regard to health and safety matters
- Provide the framework whereby health and safety risks are identified, reported and monitored until they are rectified
- Ensure compliance with South African law, including:
 - The Occupational Health and Safety Act (85 of 1993)
 - The National Building Regulations and Building Standards Act
 - Relevant regulations promulgated under these Acts, from time to time
- Minimise and control preventable incidents which may compromise the safety of employees, visitors and shoppers at Redefine properties

KEY REDEFINE EMPLOYEE STAKEHOLDERS INVOLVED

HRC	Head of Risk and Compliance
GM	General Manager/s
NFM	National Facilities Manager
PFM	Portfolio Facilities Manager
PPM	Property Portfolio Manager
FM	Facilities Manager
BM	Building Manager

KEY PILLARS OF MANAGING HEALTH AND SAFETY IN REDEFINE-MANAGED PORTFOLIOS

Maintain high levels of legal compliance to the relevant Acts	Develop a culture of ownership of health and safety	Monitor and measure health and safety performance throughout the portfolio
Health and safety training	Risk management and reporting	Incident management and reporting

MAINTAIN HIGH LEVELS OF LEGAL COMPLIANCE TO THE RELEVANT ACTS

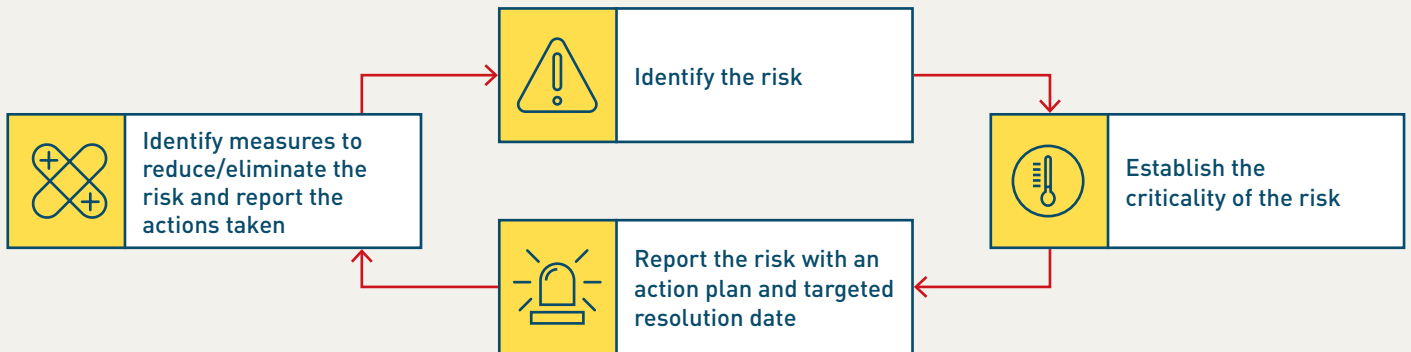
While the Occupational Health and Safety Act, in many instances, is either silent on or leaves room for interpretation when it comes to the management of buildings, Redefine is obliged to pursue best practice and fulfil its statutory duties regarding health and safety in a responsible and defensible manner. This includes but is not limited to the actions set out below.

In common areas in and around all properties:	In multi-tenanted buildings, where tenants are responsible for the safety of the areas they occupy:	In premises leased by a tenant on a Triple Net Lease, where the tenant is entirely responsible for the safety of the entire area/premises:	If the breach involves work to be undertaken by the tenant, Redefine is responsible for ensuring that:
Ensuring that they are safe and do not pose any danger to people or property	Managing any health and safety breaches in leased (tenant) premises should they arise, become apparent, be viewed during inspections, or be reported to Redefine or its representatives	Managing any health and safety breaches should they become apparent, be viewed during inspections, or be reported to Redefine or its representatives	<ul style="list-style-type: none"> • The work is completed and recorded • No further health and safety risk is posed by such breach

DEVELOP A CULTURE OF OWNERSHIP OF HEALTH AND SAFETY

Redefine is committed to ensuring the health, safety and welfare of its employees, tenants, visitors, shoppers, service providers and any other people who may be affected by our operations.

We promote a proactive health and safety management system based on effective communication, assessment, consultation, and systematic identification and control of hazards.



MONITOR AND MEASURE HEALTH AND SAFETY PERFORMANCE THROUGHOUT THE PORTFOLIO



On-site audits are consolidated by the central OHS team.

	FACILITY MANAGEMENT AUDIT	PEER REVIEW AUDIT	COMSAF EXTERNAL AUDIT	SITE VISITS
WHAT?				
WHEN AND WHO?	Monthly building audits by BM and FM	Bi-annual building audits conducted by BM or FM not responsible for the building	Annual review to ensure that all internal standards are in line with legislation	Ad hoc – all Redefine employees are required to report any items that they believe are not compliant or could pose a health and safety risk
HOW?	Physical checklist, as provided – all risk items		Comsaf presented report – all risk items and criticality of identified risks	Email/verbal discussion – all risk items

HEALTH AND SAFETY TRAINING



All Redefine employees are required to attend health and safety-related training sessions, organised by the NFM and the Learning and Development team.

Training level and frequency is dependent on the employee's job requirements:

- FMs and BMs will attend annual health and safety training modules, and firefighting and first aid training will be undertaken when existing certification expires (certification is valid for 24 months)
- All other Redefine employees will receive basic health and safety training as and when required

RISK MANAGEMENT AND REPORTING

A consolidated risk management and reporting register, detailing both category one and category two risks, will be circulated to the GMs on a monthly basis, with all new additions in a highlighted font.

The GMs are to ensure that the necessary action plans are implemented to address all risks highlighted, with an emphasis on category one risks.

A category one risk involves any risk relating to the life of persons on the property, or damage to the structure of the property, and must be reported to the NFM and the HRC within four hours of the risk being identified.



INCIDENT MANAGEMENT AND REPORTING



Incident classification and reporting are based on the following:	1	2	3
RISK/INCIDENT	An incident involving the death of or injury to a person on the property, or to major damage to its structure	An incident that resulted in minor damage to the property	An incident that did not result in death or injury to a person or damage to the property
REPORTING	Reported to the NFM, GM and HCR immediately (within four hours)	Reported to the PFM within eight hours	Reported to and managed by the FM
INCIDENT TO BE INVESTIGATED BY	FM	FM	FM
ACTION PLAN	Immediate	Put in place within 30 days to alleviate or remove the risk	Noted in risk register for resolution within 12 months, or to determine if risk level is acceptable given the circumstances of the risk
RESPONSIBLE PERSON TO ENSURE ACTION PLAN IS SET IN PLACE	PFM	PFM	PFM
RECORDED IN RISK MANAGEMENT AND REPORTING REGISTER	YES	YES	NO

DISTRIBUTION OF RISK REPORTS

WEEKLY DISTRIBUTION TO:
NFM (consolidated report of all risk categories)

BI-WEEKLY DISTRIBUTION TO:
HRC (consolidated category one risks)

MONTHLY DISTRIBUTION TO:
GMs (consolidated category one and two risks)