

# Health & Safety Organisational Structure

## Facility Management

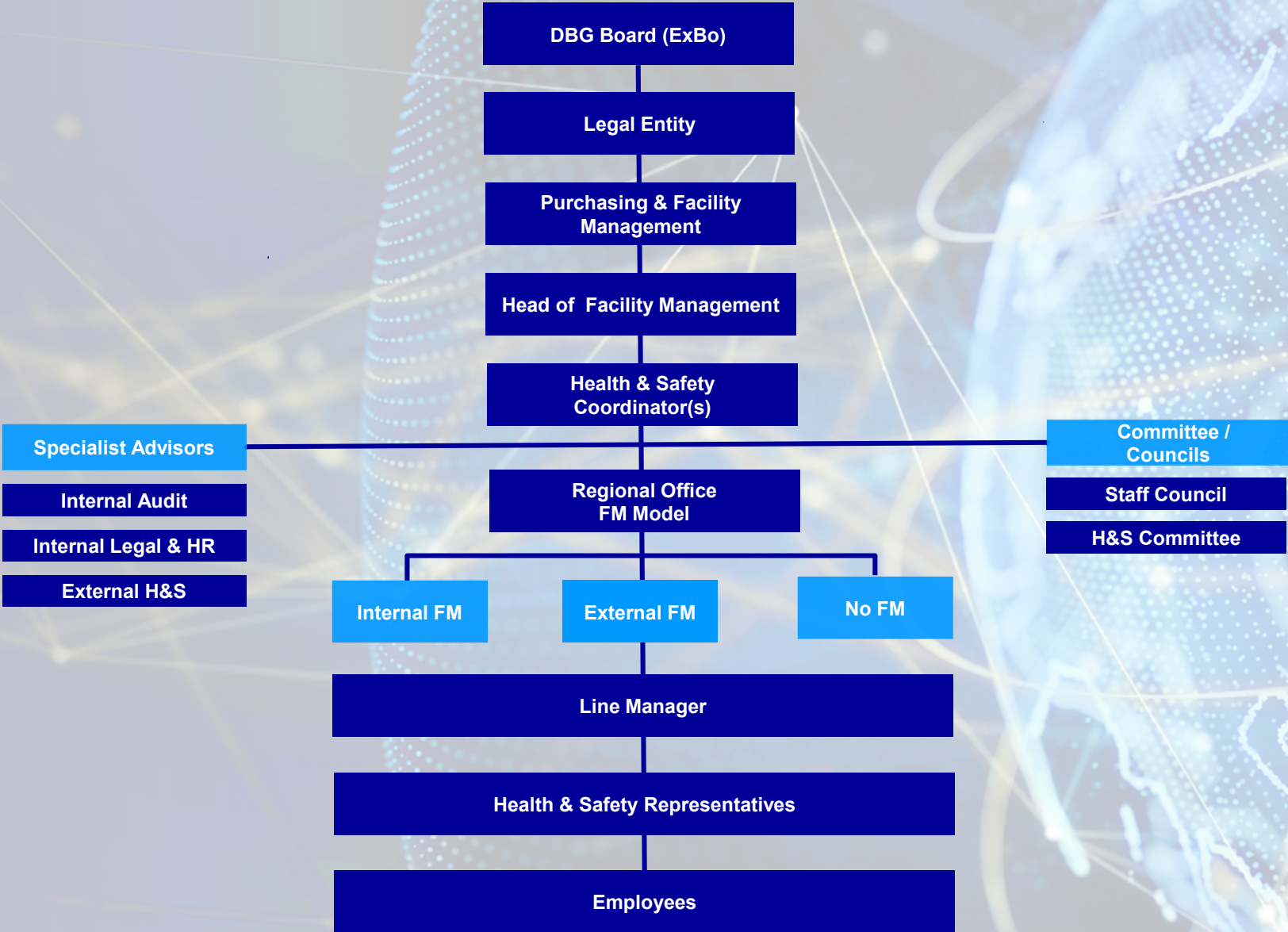
August 2023



DEUTSCHE BÖRSE  
GROUP



# Health & Safety Organisational Structure



# Health & Safety Roles /Responsibilities & Terms

Roles	Responsibilities
DBG Board (ExBo)	Approver of all Group Policies.
Legal Entity	Overall Senior Management responsibility for H&S compliance at each location. For Example: General Manager.
Head of Purchasing & Facility Management	Responsible for the overall H&S Management System as delegated by Legal Entities.
Head of Facility Management	Responsible for the implementation & day to day operation of the H&S Management System.
Health & Safety Coordinator	Internal appointed experts.
Internal Audit	Appointed internal auditors.
Internal Legal & HR	Appointed internal Legal & HR experts.
External Health & Safety Advisors	Appointed external subject matter experts.
Line Managers	Senior Management of the business entities concerned. E.g. General Manager
Health & Safety Representatives	Nominated individuals with delegated H&S responsibility at location. For example: HR, FM , Security, etc.
Employees	All staff from all business entities.
Internal FM Model	Internal FM employees based onsite.
External FM Model	External Service Provider supporting FM function onsite.
No FM Model	No internal or external FM onsite, local process coordinator manages FM tasks.

# Health & Safety Roles /Responsibilities & Terms

Terminology	Description / Responsibility
DBG Executive Committee (ExBo)	Responsible for ensuring sufficient skilled H&S resource and approver of related policy documents.
The Company	DBG & associated legal entities
Employee	All employees within all Legal Entities.
External Occupational H&S Advisors	Appointed external subject matter experts.
First Aider/ First Responder	Personnel with medical First Aid training.
Floor Warden / Fire Marshal	Responsible for evacuation of their teams and visitors. HOS generally assume the position of floor warden; they may appoint deputies for the event of their absence.
Purchasing & Facility Management	Department within DBG.
Head of Purchasing & Facility Management	Responsible for the overall H&S Management System as delegated by Legal Entities.
Health & Safety Coordinator	Appointed internal H&S experts within GOS.
Health & Safety Committee	Regular management review meetings with nominated H&S responsible personnel by location, with approved H&S agenda.
H&S Representative	Nominated individual delegated H&S responsibility at location.
Human Resources	Department or appointed HR representative within DBG Legal Entity.
HR Representatives	HR Representative for the business entity.
Line Manager	Legal Entity team leaders / Head of Section responsible for their individual teams.
Safety Delegate	LUX specific: Personnel Committee designates one of its own members or a company employee as safety delegate. This individual can complete workplace inspections alongside other H&S representative activities.
Senior Management	General Managers and senior personnel within each entity at each location.
Service Provider	Organisations/ contractors providing services at DBG locations.
Staff Council	Employee Representative for H&S specific to LUX and FRA only
Representative Office	Regional Office location (worldwide locations).
Tenant	Legal Entity named on the property lease.



# Health & Safety Management

HEALTH AND SAFETY Management Structure Manual

Version 1.1

Facility Management

Internal use only

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## 1. Introduction & Company Profile

The Company, Deutsche Börse Group (DBG) has implemented this Health & Safety Management Structure Manual (HSMS) aligned to the requirements of the International H&S Standard ISO 45001:2018, which describes the methodology by which the Company delivers its services and is underpinned by the associated Management Procedures which are split into 3 sections:

- Management Procedures
- Occupational Procedures
- Operational Procedures

The company's premises are located worldwide.

## 2. Purpose

This Health & Safety Management Structure Manual, documents DBG's specific arrangements and processes for Health & Safety Management throughout the organisation. It identifies key management processes & their interaction and details associated procedures.

The manual and management structure set out how DBG will meet its legal and other requirements whilst giving individual entities worldwide the freedom to develop local procedure and process to meet local requirements.

The HSMS has been written to reflect the requirements of:

ISO 45001:2018 - Health & Safety Management Systems requirements:

It has the following purposes:

- To establish, describe and maintain an effective Health & Safety Management Structure, which supports the implementation of the management policy; to demonstrate DBG's commitment to compliance with statutory/regulatory requirements and facilitate improvement in Health & Safety performance.
- To determine, and provide a guide to, the procedures and instructions which ensure that the HSMS is operated correctly.
- To provide a reference document for management and other personnel whose activities have an influence on Health & Safety performance.
- To assist in the training of management and personnel.
- To facilitate auditing of the Health & Safety Management Structure.
- To supplement other Health & Safety Management Structure documents which are produced to meet contractual or other Certification requirements.
- To meet the needs and expectations of company stakeholders and relevant interested parties.
- To ensure the competency of persons within, or working on behalf of, DBG.

### 3. References and Definitions

#### 3.1 References

References are made, throughout this Manual to procedures which are applicable to the Health & Safety Management Structure.

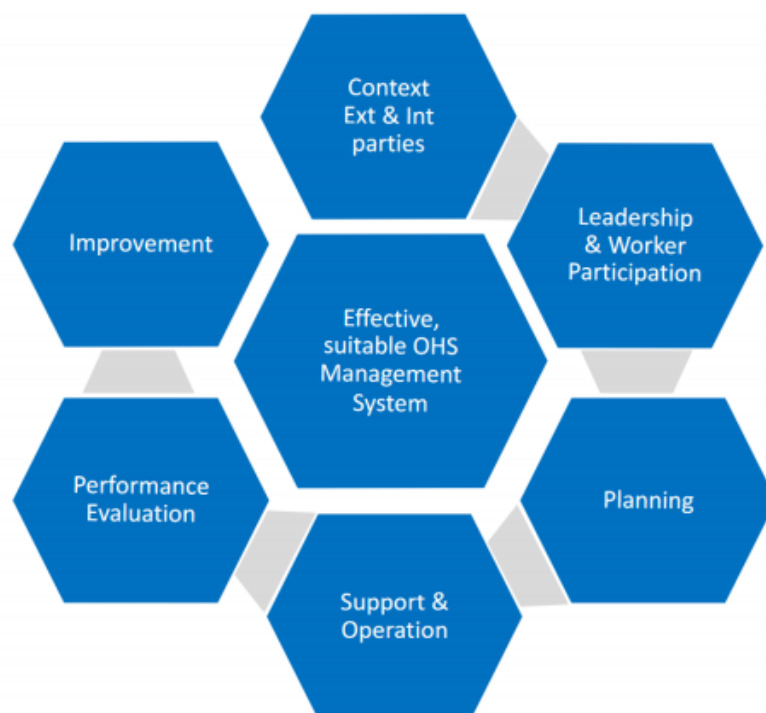
#### 3.2 Definitions

<b>DBG</b>	- Deutsche Börse Group
<b>SM</b>	- Health & Safety Manual
<b>HSMS</b>	- H&S Management Structure (Safety Management System – ISO 45001:2018)
<b>ISO 45001</b>	- ISO 45001:2018

Terms used such as policy, objectives and targets, management programme, etc, will carry the same meaning as defined in the ISO 45001:2018 standard.

### 4. Context of the Organisation

#### 4.1 Understanding the organisation and its context



DBG is committed to implementing appropriate strategies and processes that identify, analyse and manage the risks associated with these internal & external influences as a means of minimising the impact of undesired and unexpected events on our business activities.

DBG will therefore via; the Risks and Opportunities Register and Business H&S Objectives:

- Identify business objectives that reflect the interests of all our stakeholders
- Identify both the threats to the achievement of our business objectives and possible opportunities
- Control and manage our exposure to risk by appropriate risk reduction and mitigation actions
- Regularly review our exposure to all forms of risk and reduce it as far as reasonably practicable or achievable
- Apply robust risk management processes as part of a wider management structure
- Educate and train our managers in risk management
- Regularly review the risks we face as a result of our business activities and of the business and economic climate in which we operate
- Identify cost effective risk treatment options
- Identify and regularly measure key risk indicators and take appropriate action to reduce our risk exposure



#### 4.2 Understanding the needs and expectations of Employees & Interested Parties

DBG will ensure that its activities meet the requirements and expectations of applicable statutory/regulatory and other interested third parties.

DBG Procedures and the Communication & Stakeholder Needs Register will detail those relevant “interested parties” who have the ability to impact (or potentially impact) on our ability to carry out our core business activities while meeting those statutory and regulatory requirements.

The Management Review process will ensure that the interested parties and their requirements are reviewed annually.

MP001 [Legislation and Other Requirements Procedure](#) details those needs and expectations which are, or could become, legal requirements.

#### 4.3 Determining the Scope of the Safety Management Structure

The scope of the Health & Safety Management Structure is:

Provision of financial services including:

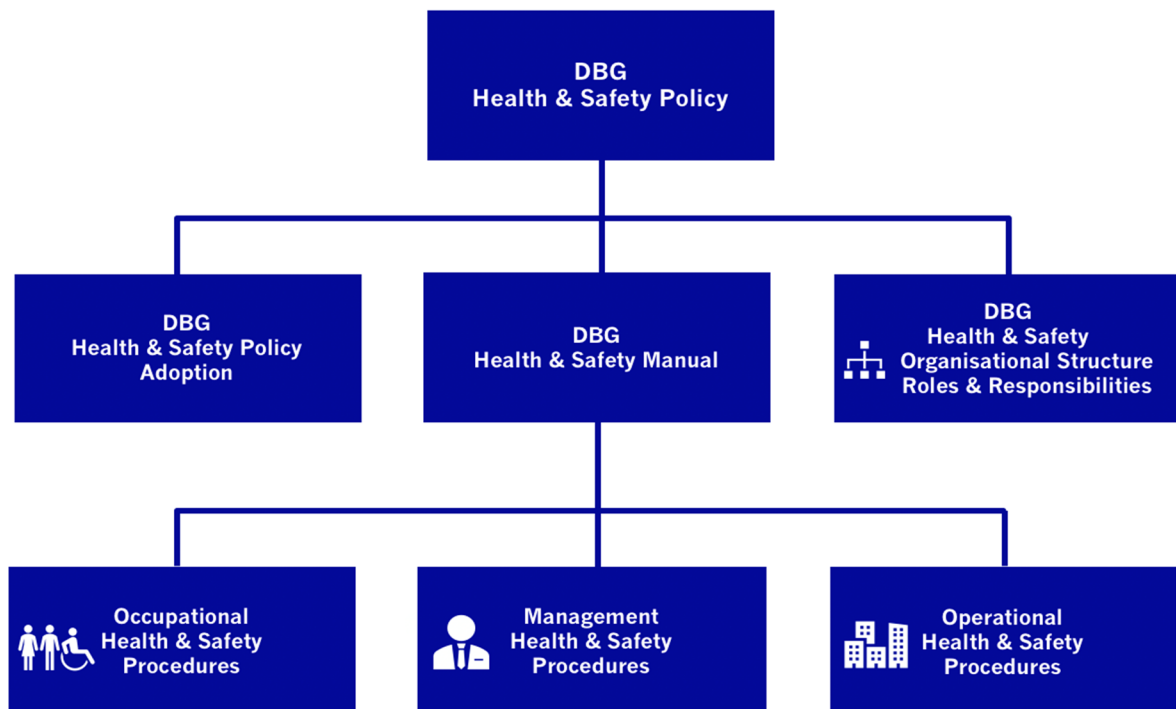
- Internal Facility Management Services

Boundaries: The scope of the Health & Safety Management Structure include:

- All locations controlled by DBG Legal Entities who have adopted the H&S Policy
- All Employees
- External Service Providers

#### 4.4 Health & Safety Management Structure (HSMS) and its processes

We have implemented this HSMS to reflect the requirements of ISO 45001:2018 ensuring the Company meets its commitment to continually improve processes and the HSMS.



Within this manual and associated procedures, the Company has identified those individuals with specific responsibilities, the required processes, their application, sequence and interaction and has determined methods and criteria to ensure that these processes are effective.

Furthermore, we have provided Key Performance Indicators, the means to ensure that the necessary resources are available and that all processes are monitored, measured & analysed with actions taken to ensure that the planned results will continually improve processes and the HSMS.

All processes including any that are outsourced are managed to reflect the ISO 45001:2018 standard.

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4.4 OH&S management system	5.4 Consultation and participation of workers		7.4 Communication			
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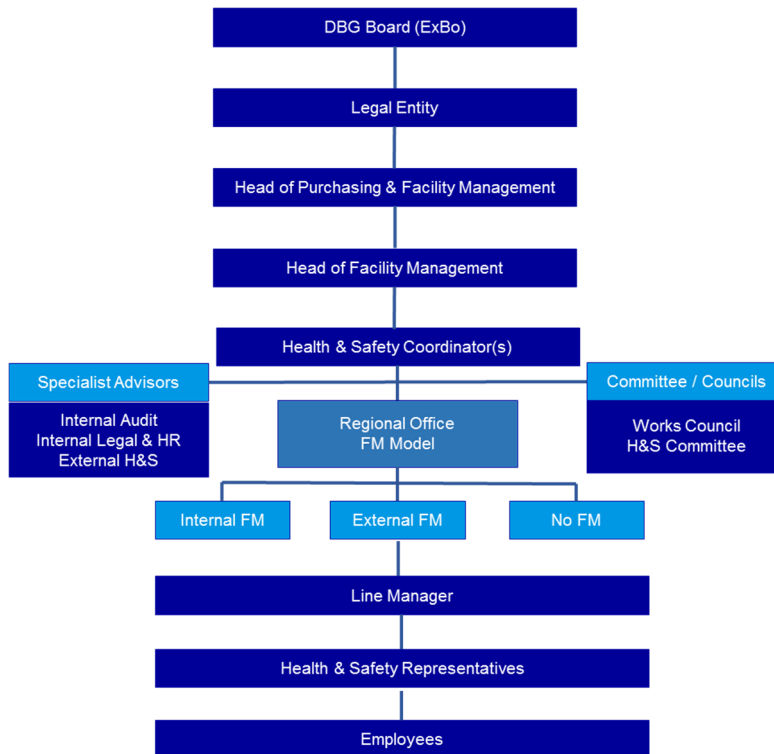


## 5. Leadership and Employee Participation

### 5.1 Leadership and Commitment

DBG have set out a clear leadership structure for the management of Health and Safety. By good leadership and setting the right example the HSMS will achieve the results intended and lead employees to contribute to the effective operation of the procedures.

#### 5.1.1 DBG H&S Organisational Structure



Leadership is demonstrated at various points of the HSMS e.g., development of H&S Policy, attendance at quarterly H&S committee meetings, annual management review, workplace H&S tours etc.

### 5.2 Health & Safety Policy

DBG has established a documented Health & Safety Policy that is consistent with the purpose and context of the company's undertakings. It provides a framework for the setting and reviewing of Health & Safety Objectives.

It will be available to those interested parties as required and will be reviewed and maintained via the Management Review process with the review process recorded and endorsed by the Head of Purchasing & Facility Management.

### 5.3 Roles, Responsibilities and Authorities

The Head of Purchasing & Facility Management shall ensure that the responsibilities and authorities for relevant roles within the HSMS are delegated to the correct level and expertise of employee, are communicated at all levels within the Company and recorded as documented information.

Employees at each level of the Company shall assume responsibility for those aspects of the HSMS over which they have control.

The Health and Safety Organisational Structure (5.1.1 above) and Health and Safety Roles/ Responsibilities and Terms will detail those roles and responsibilities.

## 5.4 Consultation and Participation of Employees

DBG will ensure processes for the consultation and participation of workers at all levels are in place to involve all staff in the development, planning, implementation, performance evaluation and actions for improvement of the HSMS. Where consultation and participation of workers has a specific local legal requirement over and above the requirements of the DBG HSMS will be identified and local procedures implemented.

Examples of Consultation and Participation include:

- An open-door policy;
- Nominated Safety Representatives from within the workforce
- Quarterly H&S Committee meetings
- H&S committee meetings as required by local legislation at DBG office locations.

## 6. Planning for the Health & Safety Management Structure

### 6.1 Actions to Address Risks and Opportunities

#### 6.1.1 General

DBG will risk assess all of its internal and external issues (these may be both risk and opportunities) that may impact on the business and the requirements of our Stakeholders via the Risk and Opportunity Register and the process detailed within [MP004 Risk Assessment & Systems of Work](#). The outcome of the risk assessment process will be analysed to determine whether the:

- HSMS is able to achieve its intended outcomes
- Prevents or reduce undesired effects
- Achieve continual improvement

The H&S Risk and Opportunities Register will take into account:

- Hazards
- H&S risks and other risks
- H&S opportunities and other opportunities
- Legal requirements and other requirements
- Organisational Change
- Processes

#### 6.1.2 Hazard identification and assessment of risks and opportunities

[MP004 Risk Assessment & Systems of Work](#) will detail the arrangements and processes for hazard identification and assessment of risks and opportunities.

Once the risks and opportunities have been identified they will be discussed within the Quarterly H&S Committee meeting process and decisions will be made on how they will be addressed and recorded via the H&S Action Log.

#### 6.1.3 Determination of legal requirements and other requirements

[MP001 Legislation and Other Requirements Procedure](#) details the legislation and other Standards that are applicable to DBG's activities and risks. The effectiveness of the review of compliance to legislation and managing change processes provides information on how the effectiveness of compliance continually improves its HSMS.

Where local legal or other requirements place demand on the business over and above the basic requirements of the DBG HSMS then local procedures will be developed to comply with these requirements. All local procedures will be approved by the Health and Safety Co-ordinator responsible for that region and reported on at the quarterly H&S committee meeting.



#### 6.1.4 Planning Action

DBG will ensure any planning actions to address the considerations detailed below:

Consideration	Planning Mechanism
Significant risks identified by Risks & Opportunities Register	<ul style="list-style-type: none"><li>Management Review Process; MP002 Management Review Procedure</li><li>H&amp;S Objectives</li></ul>
Legal & Other Requirements identified by MP001 Legal & Other Requirements Procedure	<ul style="list-style-type: none"><li>Evaluation of Compliance Process</li><li>Internal Auditing as described in MP005 Monitoring and Measuring</li></ul>
Prepare and Respond to Emergency Situations	<ul style="list-style-type: none"><li>MP003 Accident Reporting Procedure</li><li>OCP003 Fire and Emergency Procedure</li></ul>

The mechanisms detailed above will ensure the actions are integrated into the HSMS Structure and ensure that the effectiveness of the actions is evaluated.

#### 6.2 H&S Objectives and Planning to Achieve Them

The H&S Committee will set annual objectives at the annual management review meeting. The objectives will be tracked at the quarterly H&S Committee meetings.

### 7. Support

#### 7.1 Resources

The H&S Committee shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the HSMS.

#### 7.2 Competence

MP007 [Training & Competence Procedure](#) details how employees will be appropriately educated, trained, skilled and experienced to be deemed competent to carry out their duties and how where applicable training is provided or other actions to achieve the necessary competence and to ensure that the necessary competence has been achieved.

#### 7.3 Awareness

MP006 [Communication and Consultation](#) will ensure that Employees and other Interested Parties are made aware of:

- The H&S policy and H&S objectives
- Their contribution to the effectiveness of the HSMS, including the benefits of improved H&S performance
- The implications and potential consequences of not conforming to the HSMS requirements
- Incidents and the outcomes of investigations that are relevant to them
- Hazards, H&S risks and actions determined that are relevant to them

#### 7.4 Communication

MP006 [Communication and Consultation](#) details how internal and external communications are controlled, managed and takes into account the legal requirements of the Company.

## **7.5 Documented information**

Preparation and issue of new or revised documents is in accordance with the requirements of DBG document control processes [MP010 Documented Information Control](#).

## **8. Operation**

### **8.1 Operational Planning and Control**

DBG will plan, implement and control those identified processes that it has previously identified (see clause 4.4) as necessary. Additionally, we will plan how we will address any risks and opportunities that may impact upon these processes and, therefore, our ability to achieve these requirements.

The planning process commences with the establishment of the HSMS requirements, once this has been completed, DBG will then consider its processes and for each will establish:

- The criteria for the process
- How the process will be controlled
- The acceptance criteria for the outputs of each process
- The resources necessary to support each process

This means that the inputs (triggers for the process), outputs (activities and services) and resources and controls (to ensure that the required outputs are achieved) can be determined.

Additionally, we will determine what makes the output acceptable, i.e. targets, measures, values, KPIs, specifications and other criteria as relevant to the output. All of the above will be documented

#### **8.1.2 Eliminating hazards and reducing OH&S risks**

MP004 Risk Assessments & Systems of Work detail the arrangements for the elimination of hazards and the reduction of H&S risks using the following hierarchy of controls:

- Eliminate the hazard;
- Substitute with less hazardous processes, operations, materials or equipment;
- Use engineering controls and reorganization of work;
- Use administrative controls, including training;
- Use adequate personal protective equipment.

#### **8.1.3 Management of Change**

MP004 Risk Assessments & Systems of Work and the Change Register ensures that the risks associated with any unplanned or planned change to legislation equipment, plant, organisation, location & working practices are assessed and controlled so that the change does not increase risks to safety.

Wherever possible, such changes shall be managed so as to improve safety. In all cases, before the change is authorised the safety implications shall be evaluated for all stages involved (including planning and implementation) and for the outcome of the change.

Temporary Changes will be managed via MP004 Risk Assessment & Safe System of Work, in the form of Risk Assessments or revisions to safe systems of work

#### **8.1.4 Procurement**

[MP011 Externally Provided Products & Services](#) ensure that purchased products and services conform to specified requirements. Established processes ensure that External Providers are evaluated before being approved for use and that appropriate control is exercised when:

- Products and services from the external providers for incorporation into DBG's own products and services
- Outsourced processes or parts of processes from an external provider

## External Providers

MP011 Externally Provided Products & Services and OP003 Control of Contractors will detail the type and extent of controls applied to the external providers based on the potential impact the externally provided processes, products or services could have on its ability to provide a healthy and safe environment for our workforce and the public when on our premises.

MP005 Monitoring & Measuring will detail the checks and control in place to ensure that externally provided processes, products and services do not detrimentally affect the company's ability consistently to deliver a healthy and safe environment for our workforce and the public when on our premises.

Whenever any process or service has been outsourced to an external provider, the same considerations detailed above will be applied.

Purchasing requirements as detailed below will be communicated to the external providers via company purchasing procedures.

- Requirements relating to the products or services to be provided or the processes to be performed by the external provider.
- Requirements relating to the approval or release of the product or service, methods, processes or equipment.
- The competency of personnel, including any necessary qualifications they must possess.
- Any actions that the external provider must undertake in order to ensure that it interacts appropriately with the HSMS
- Details as to how the external provider's performance will be monitored and controlled.
- Details of any verification activities that DBG intends to perform at the external provider's premises.

We will ensure that the requirements communicated to the external providers are reviewed for adequacy prior to their being communicated.

## 8.2 Emergency Preparedness and Response

To identify the principles and prerequisites of planning to provide an effective response to accidents, incidents and emergencies on DBG premises and other managed assets. OCP003 Fire and Emergency Procedure has been implemented – this procedure sets out the framework for all locations to implement their own fire & emergency procedure in line with DBG and local legal requirements.

In addition, building specific emergency and evacuation plans will be produced when the risk assessment determines that there is the potential for other related incident from the activities being undertaken.

## 9. Performance and Evaluation

### 9.1 Monitoring, Measurement, Analysis and Performance Evaluation

#### 9.1.1 General

MP005 Monitoring and Measurement Procedure describes the system for monitoring the HSMS; to determine that products and services conform to our own requirements and those of ISO 45001:2018 and to identify whether the HSMS is being effectively monitored, measured, analysed and evaluated.

Health & Safety performance will be evaluated and analysed at quarterly H&S Committee meetings and annually at the Management Review Meeting to ensure continuous improvement and the effectiveness of the HSMS and will be undertaken at least annually by means of:

- External & Internal Audit
- Site Inspections (OPCR)
- Review of the effectiveness of compliance to legislation
- Statutory Body Notices
- Management Review
- Stakeholder Feedback to include Customer Complaints

Results of internal, external audits and other monitoring shall be analysed, evaluated and communicated, recorded, retained and communicated as necessary.

### **9.1.2 Evaluation of Compliance**

Using those methods detailed above in 9.1.1 the evaluation of compliance will be reviewed at least annually.

This methodology is set out in MP001 Legislation and Other Requirements Procedure.

If action is to be taken following the review a non-compliance report (NCR) will be issued and recorded on the H&S Tracker to ensure the required action is carried through to completion.

## **9.2 Internal Audit**

MP005 [Monitoring and Measuring Procedure](#) describes the system for the internal auditing of the HSMS and includes establishing, implementing and maintaining an audit programme including the frequency, methods, responsibilities, consultation, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;

- Define the audit criteria and scope for each audit;
- Select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;
- Ensure that the results of the audits are reported to relevant managers; ensure that relevant audit results are reported to workers, and, where they exist, workers' representatives, and other relevant interested parties;
- Take action to address nonconformities and continually improve its H&S performance
- Retain documented information as evidence of the implementation of the audit programme and the audit results.

## **9.3 Management review**

MP002 [Management Review Procedure](#) details the process of the 12 monthly review of the HSMS, ensuring its continuing suitability, adequacy, and effectiveness and takes into account:

- The status of actions from previous management reviews;
- Client Requirements
- The needs and expectations of interested parties;
- Legal requirements and other requirements;
- Risks and opportunities;
- The extent to which the H&S policy and the H&S objectives have been met;
- Incidents, nonconformities, corrective actions and continual improvement;
- Monitoring and measurement results;
- Results of evaluation of compliance with legal requirements and other requirements;
- Audit results;
- Consultation and participation of workers;
- Risks and opportunities;
- Adequacy of resources for maintaining an effective HSMS;
- Relevant communication(s) with interested parties;
- Opportunities for continual improvement.

The outputs of the management review include the decisions related to:

- The continuing suitability, adequacy and effectiveness of the HSMS in achieving its intended outcomes
- Continual improvement opportunities
- Any need for changes to the HSMS
- Resources needed
- Actions, if needed
- Opportunities to improve integration of the HSMS with other company processes
- Any implications for the strategic direction of the company



The H&S Committee shall ensure that the relevant outputs of management reviews are communicated to employees and other interested parties.

Records of the Management Review minutes will be kept for 12 months or until the next Management Review meeting whichever is the longest.

## **10. Improvement**

### **10.1 General**

The DBG H&S Committee will endeavour to improve H&S performance but are mindful that improvement will not always take place on a continual basis, it can occur for example; as a result of corrective action, through innovation and sometimes as a result of re-organisation.

### **10.2 Incident, Nonconformity and Corrective Action**

MP003 [Accident Reporting](#) will ensure that accidents and incidents are investigated in a timely manner and:

- Action is taken to control and correct any areas on non-conformance
- Deal with the consequences;
- Evaluate, with the participation of employees and the involvement of other relevant interested parties, the need for corrective action to eliminate the root cause(s) of the incident or nonconformity, in order that it does not recur or occur elsewhere, by:
  - Investigating the incident or reviewing the nonconformity
  - Determining the cause(s) of the incident or nonconformity
  - Determining if similar incidents have occurred, if non-conformities exist, or if they could potentially occur
  - Review of existing Risks Assessments
  - Determine and implement any action needed, including corrective action, in accordance with the hierarchy of controls and the management of change
  - Assess H&S risks that relate to new or changed hazards, prior to taking action
  - Review the effectiveness of any action taken, including corrective action
  - Make changes to the HSMS, if necessary

Any Corrective Action whether raised through the Audit, OPCR or Accident/Incident managed as per the arrangements detailed in [MP005 Monitoring and Measurement Procedure](#) and will be recorded on the Audit Tracker.

There may be instances where it is impossible to eliminate the root cause of non-conformity altogether. Therefore, in such instance the H&S Committee will reduce the likelihood of a similar occurrence happening again to an acceptable level.

### **10.3 Continual Improvement**

DBG H&S Committee will work continually to improve its HSMS in terms of its suitability, adequacy and effectiveness, to determine areas of underperformance and to identify any opportunities for improvement using the following tools and methodologies:

- Management Reviews
- Audits
- Enhancing H&S Performance
- Promoting a culture that supports the HSMS
- Through the participation of employees in implementing actions for the continual improvement of the HSMS
- Communication of relevant results of continual improvement to employees
- Maintaining and retaining documented information as evidence of continual improvement