



HEALTH AND SAFETY POLICY



Table of Contents

1	Overview	1
2	Scope	2
3	Commitment of Management	3
4	Procedure and work instructions for employees and contractors to follow	4
5	Hazard identification and managing risk	5
6	Safety Measures	7
7	Incident Reporting	10
8	Monthly Audit	11
9	Annexure	12

1. Overview

At Photon, we are committed to providing and maintaining a safe and healthy workplace for all workers (including contractors and volunteers) as well as clients, visitors, and members of the public.

The safety and health of our employees is this company's most important business consideration. No employee will be required to do a job that they consider unsafe. The company will comply with all applicable Photon workplace safety and health requirements and maintain occupational safety and health standards that equal or exceed the best practices in the industry.

The responsibility for managing health and safety ultimately rests with the person in control of the business, directors, and management. Workers also have important responsibilities for health and safety in the workplace.



2. Scope

The scope of this policy is applicable to all the employees of Photon Interactive.

3. Commitment of Management

We will develop and maintain a health and safety management system to ensure a safe and healthy work environment. Specifically, management will:

- Set health and safety objectives and performance criteria for all employees and work areas.
- Commitment to consulting and cooperating with employees in all matters relating to health and safety in the workplace.
- Annually review health and safety objectives and employee performance against these policies.
- Actively encourage the accurate and timely reporting and recording of all incidents.
- Investigate all reported incidents and injuries to ensure all contributing factors are identified and, where appropriate, plans are developed to take corrective action.
- Identify all existing and new hazards and take all practicable steps to eliminate, isolate, or minimize the exposure to significant hazards.
- Ensure all employees are aware of the safety requirements in the work area.
- Enforce company safety and health rules and require employees to follow the rules as a condition of employment.
- Ensure that adequate training is given to the employees, enabling them to perform their duties in a safe manner.
- Encourage employee consultation and participation in all matters relating to health and safety.

4. Procedure and work instructions for employees and contractors to follow

Every manager, supervisor, or foreperson has a responsibility for the health and safety of employees working under their direction.

Every employee is expected to share in this commitment to health and safety in the workplace by:

- Ensuring their own personal health and safety and that of others in the workplace.
- Complying with all safe work procedures, rules, and instructions given by management for health and safety.
- Employees are expected to participate in safety and health program activities that include immediately reporting hazards, unsafe work practices, and accidents to supervisors or a safety committee representative and participating in and supporting safety committee activities.
- Reporting any incident early on.
- Taking an active role in the company's safety plan to ensure an early and durable return to work.
- Ensuring all incidents and injuries are reported to the appropriate person.

The health and safety committee includes senior management representatives, union, and other nominated employee representatives. It is responsible for implementing, monitoring, reviewing, and planning health and safety policies, systems, and practices.

5. Hazard identification and managing risk

Ensure that there is a formal process for hazard identification and control to manage workplace and safety hazards within Photon effectively. Workplace hazard identification, risk assessment, and control are ongoing processes. It should be undertaken at various times, including:

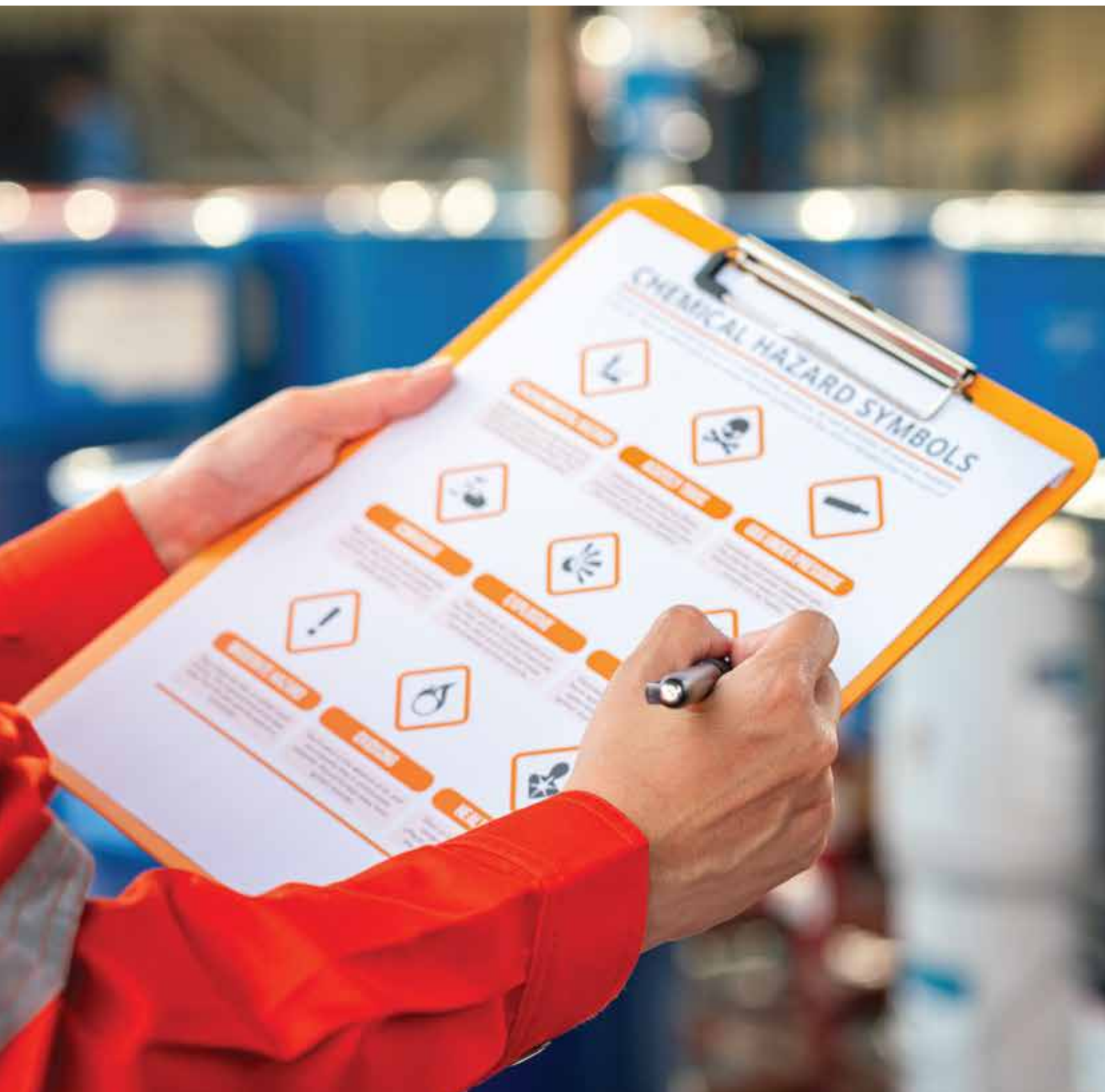
- If it has not been done before.
- When a hazard has been identified
- As part of responding to a workplace incident, even where an injury has not occurred.
- Where new information about risk becomes available, or concerns about risk are raised by workers
- At regularly scheduled times appropriate to the workplace.

It is often more effective and easier to eliminate hazards if risk management approaches are used at the planning and design stages for products, processes, and places for work.

The following procedure for risk management (involving hazard identification, risk assessment, and control) is a practical guide for helping make workplaces safer for workers, contractors, and visitors. It will help both management and workers, through consultation, to comply with the WHS regulations. These regulations require the management to identify, assess, and control hazards in the workplace with the aim of eliminating hazards or minimizing hazards as far as reasonably practicable. Recording risk management activities, including risk assessments and consultation processes, is required.

These procedures will assist in:

- Finding hazards in workplaces.
- Assessing the risks that may result from these hazards.
- Determining control measures to eliminate or minimize the level of the risks.
- Monitoring and reviewing the effectiveness of control measures.



6. Safety Measures

The safety and health of our employees is this company's most important business consideration. No employee will be required to do a job that they consider unsafe. The company will comply with all applicable Photon workplace safety and health requirements and maintain occupational safety and health standards that equal or exceed the best practices in the industry.

Fire Safety:

Employers are required to assess the fire risks in their premises to ensure that the risk of fire is minimized and that appropriate arrangements are provided for the safe evacuation of employees in the event of a fire occurring.

Fire risk assessments should be undertaken to ensure the effectiveness of the fire safety arrangements. The fire risk assessment should define the arrangements and requirements for ensuring adequate provision of fire prevention and detection systems, firefighting equipment, provision of training and information, and the maintenance of installations and equipment provided for the purposes of detection and firefighting. Consideration should also be given to issues such as hazardous or dangerous substances and young people. The arrangements for fire safety on contract sites are reviewed by contract managers during the site risk assessment and specified in the assignment instructions.

Risk assessments should be reviewed prior to any significant changes to ensure such changes will not increase the risks to an unacceptable level. If there are no significant changes, the risk assessment should still be reviewed annually to ensure it remains suitable and relevant and the control measures are still the most effective way to manage the risks.

Fire Evacuation Procedures

Formal fire evacuation procedures should be displayed on all premises occupied by Photon employees. The procedures should detail the means of raising the alarm, the means of escape from the building, and the designated fire assembly point(s).

On discovering a fire, staff should raise the alarm and evacuate the dangerous area. From a position of safety, the fire service should be called. Upon hearing the alarm, staff should turn off the equipment they are using and evacuate the building using the quickest available means. During a fire evacuation, no attempt should be made to use a lift.

- A copy of the fire risk assessment should be kept in the safety management file.
- Maintenance of fire equipment should be recorded in the maintenance record in the safety management file.
- Maintenance of fire systems, such as alarms, emergency lighting, call points, sprinklers, etc., should be recorded in the maintenance record in the safety management file.
- Fire alarm tests and fire drills should be recorded in the fire log in the safety management file.
- Information and training provided to employees should be recorded in the information and training record in the safety management file.

All the new fire extinguishers are red. The different types of extinguishers are identified by labeling and a small, color-coded panel.

First Aid:

Employers are required to make adequate provision for first aid, taking account of the risks associated with the undertaking, the number of employees, and the proximity of emergency services.

First aid supplies should be provided and maintained in all workplaces occupied by Photon employees. In offices where there are more than 50 employees, first aiders should be trained and appointed. In offices where there are less than 50 employees, appointed persons should be designated to take charge in the event of a medical emergency and maintain first aid supplies.

It is recommended that all appointed persons attend emergency aid training courses. Appointed people must not provide first aid unless they have been trained to do so. Planned absence of appointed persons and first aiders should be coordinated to ensure adequate provision remains available. The names and contact details of first aiders or appointed persons should be displayed on noticeboards.

- The names and contact details of first aiders should be recorded and displayed on noticeboards.
- The first aider and appointed person training should be recorded in the information and training record in the safety management file.
- First aiders should record all treatment provided on the accident investigation report form – see earlier section regarding accidents.

7. Incident Reporting

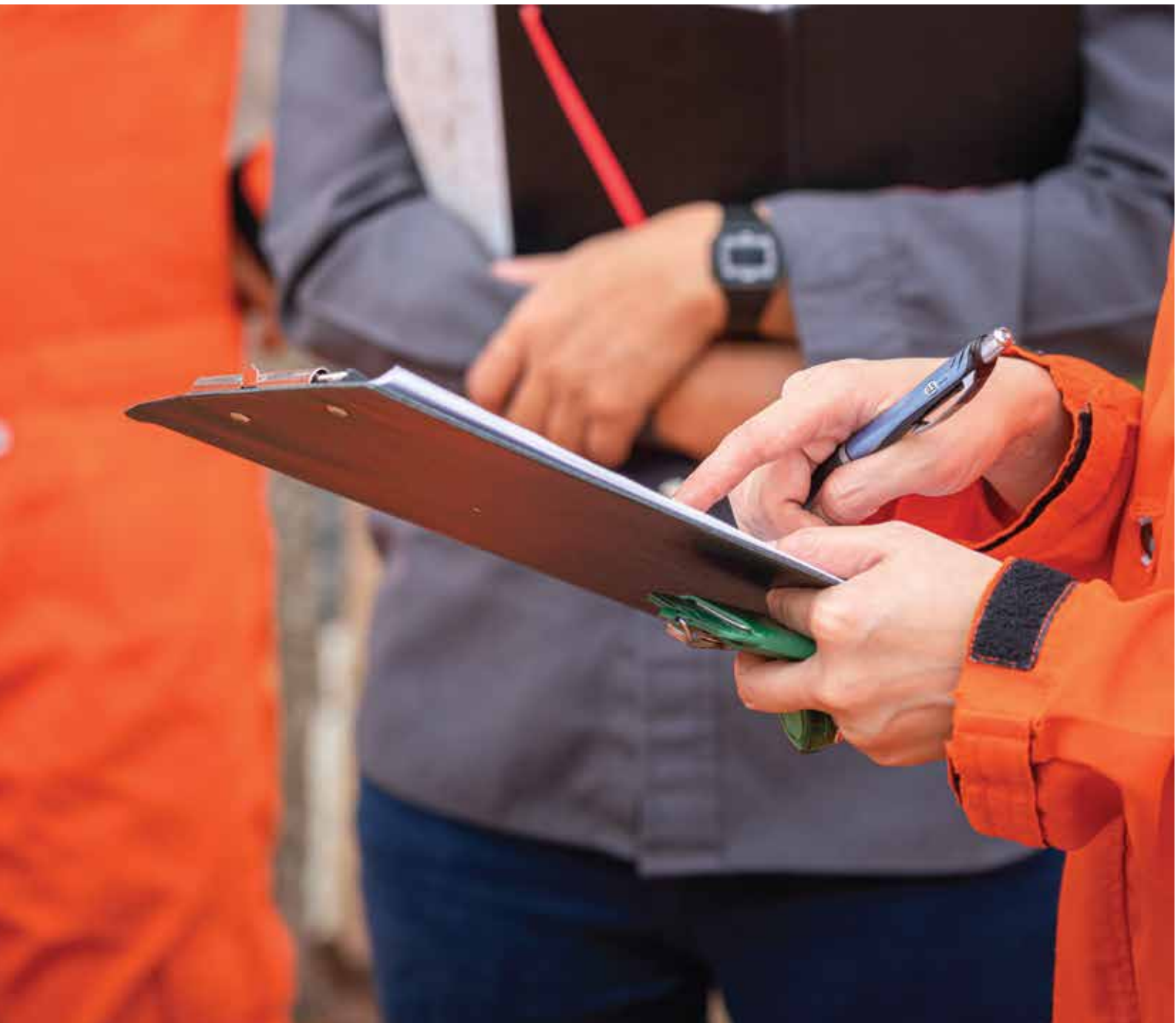
Reporting these incidents provides opportunities to improve the performance of safety programs, the quality of the working environment, and the safety of staff and visitors, and to ensure compliance with the Occupational Health & Safety Act and the Workplace Safety & Insurance Act.

When an injury occurs in the workplace, the priority is to ensure prompt medical treatment for the injured employee and to ensure that incidents, injuries, and hazards are reported to the appropriate person.



8. Monthly Audit

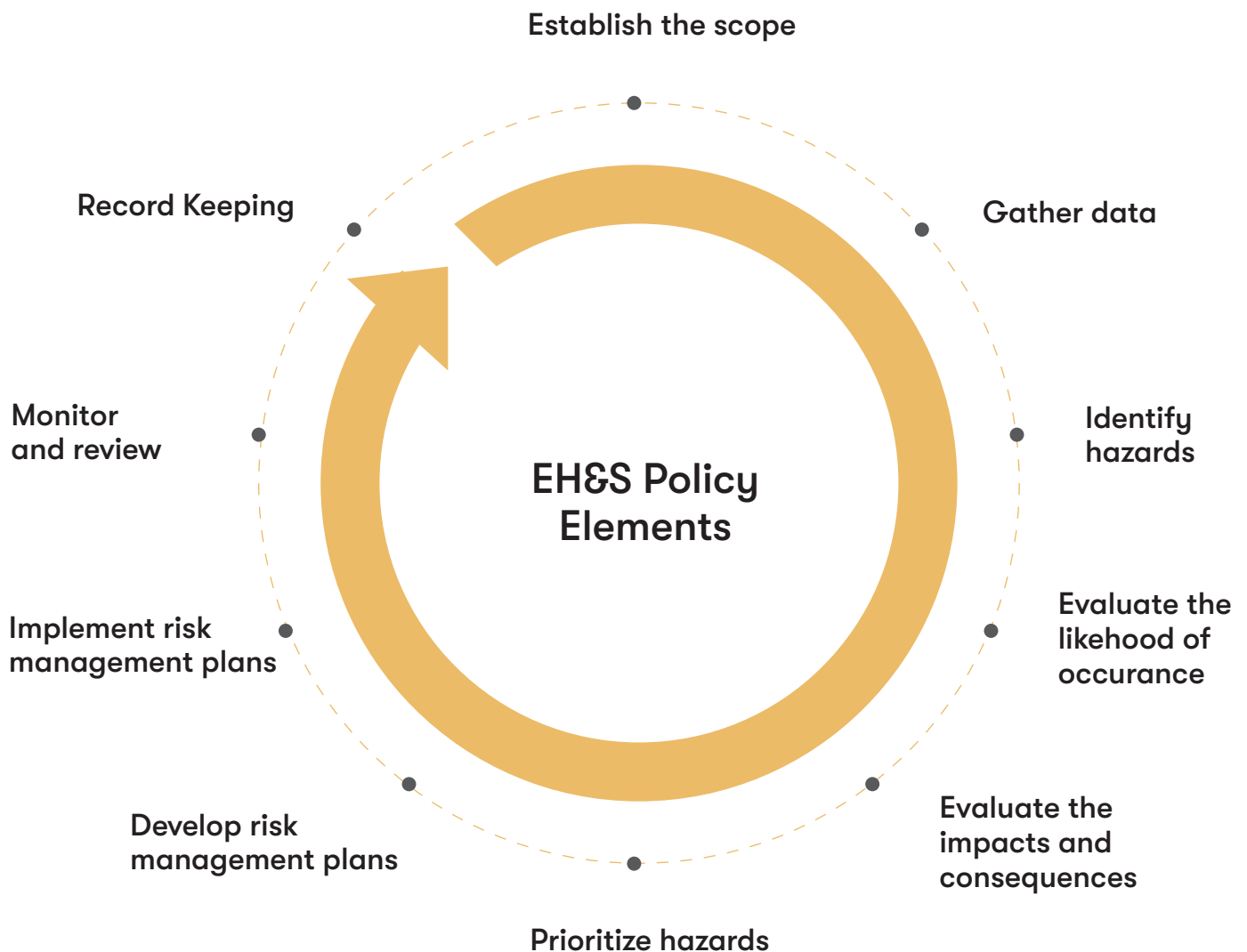
Safety Audits for IT and facilities are conducted for the purpose of health, safety, and fire hazard identification. During these surveys, assessments are made for compliance with applicable Government and Photon regulations and fire codes and the detection of unsafe hazards. Audits also provide an evaluation of workplace compliance with Occupational Safety and Health Administration standards relating to workplace and worker safety.



9. Annexure

EH&S Policy Elements

Safety Audits for IT and facilities are conducted for the purpose of health, safety, and fire hazard identification. During these surveys, assessments are made for compliance with applicable Government and Photon regulations and fire codes and the detection of unsafe hazards. Audits also provide an evaluation of workplace compliance with Occupational Safety and Health Administration standards relating to workplace and worker safety.



9.1 Establish the scope:

Define the areas of concern and the assessment objective for all domestic and international locations of the company.

9.2 Gather data:

Collect relevant data such as company records, governmental regulations, historical data on incidents, and expert opinions for each domestic and international location.

9.3 Identify hazards:

Identify potential hazards through brainstorming, walk-throughs, process mapping, and other tools for each location of the company.

9.4 Evaluate the likelihood of occurrence:

Determine the likelihood of each hazard occurring based on historical data, company records, and expert opinions.

9.5 Evaluate the impacts and consequences:

Determine the potential impacts and consequences of each hazard, including harm to people, the environment, and the organization.

9.6 Prioritize hazards:

Rank the hazards based on their likelihood of occurrence and the potential consequences.

9.7 Develop risk management plans:

Develop risk management plans for the highest priority hazards, including strategies for mitigating the hazard, monitoring and reviewing the effectiveness of the plan, and preparing for emergency response.

9.8 Implement risk management plans:

Implement the risk management plans, including training employees on the plans and the procedures for responding to emergencies.

9.9 Monitor and review:

Regularly monitor and review the effectiveness of the risk management plans and make changes as needed.

9.10 Record keeping:

Document the entire process, including the data collected, the hazards identified, the risk management plans developed, and the results of monitoring and review for each domestic and international location.

9.11 Cross-cultural considerations:

Consider cultural differences and local regulations for each international location in the implementation of the risk management plans.