

Document Title:	GEMS Health and Safety Policy
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Policy Reviewer:	Head of Health, Safety and Environment
Policy Approver:	Board Risk and Audit Committee

1. Purpose and Scope

1.1 Purpose

The purpose of this *GEMS Health and Safety Policy* is to outline the GEMS approach towards preventing injury, illness and environmental harm; complying with all applicable health and safety related laws, regulations and standards; and promoting a culture of continuous improvement in health and safety performance with a focus on setting industry best practice. The *GEMS Health and Safety Policy Statement* acts as a clear, high-level commitment statement that publicly expresses the leadership's intent, priorities, and expectations.

1.2 Scope

This policy applies to all GEMS schools and corporate departments, including all staff, students, contractors, and visitors engaged in activities under our control. It covers all locations, facilities, and operations managed by the organisation – including GEMS School Management. GEMS service entities (Threads, ESM, Slices, Safecor, and STS) manage their own health and safety policies.

2. Roles and Responsibilities

A comprehensive outline of health and safety responsibilities is included in the *GEMS HSE Roles and Responsibilities Policy (HSE-POL-19)*.

The responsibilities listed below relate specifically to this *GEMS Health and Safety Policy* and the *GEMS Health and Policy Statement* and are key to ensuring their successful implementation across the organisation.

2.1 GEMS Risk and Audit Committee

- Enacts corporate governance and oversees the effective implementation of this policy.
- Ensures that the GEMS health and safety framework aligns with organisational goals by reviewing and approving significant changes to the health and safety policies, where relevant.
- Ensures the HSE function is adequately resourced and empowered via the Chief Risk and Assurance Officer.
- Monitors performance through key health and safety metrics and reports.

2.2 GEMS Chief Executive Officer (CEO)

- Holds ultimate responsibility for the effective implementation of this policy across the organisation.
- Takes all reasonable steps, including allocating adequate resources, to ensure implementation of this policy.

2.3 GEMS Head of Health Safety and Environment (HSE)

- Responsible for developing and maintaining the standards, processes, guidelines and internal controls within the GEMS health and safety framework that support the implementation of this policy.
- Ensures regular review of this policy and its related documents and processes.
- Provides assurance to the GEMS CEO via the GEMS Risk and Audit Committee on implementation, gaps and opportunities related to the implementation of, and compliance with, this policy.

2.4 GEMS HSE Team

- Communicates this policy to all GEMS employees, and ensures it is made available via the GEMSnet portal.
- Ensures alignment between the policy and supporting documentation within the HSE Management System.
- Monitors implementation of the policy across GEMS operations to ensure it's consistently applied.
- Reviews and updates this policy periodically to reflect changes in regulations, organisational structure, and risk profile, ensuring it remains current and effective.
- Gathers feedback and insights from audits, incidents, and stakeholder input to inform continuous improvement of this policy and related health and safety practices.

2.5 School Principals

- Hold ultimate responsibility for implementing this policy in their school and related activities.
- Ensure the policy is communicated to all school staff and shared with relevant external stakeholders.
- Allocate adequate resources to enable their school to meet its health and safety obligations and objectives.
- Foster a sense of shared responsibility for health and safety across the school.
- Ensure that their staff are provided with adequate and appropriate health and safety information and training, are competent in safety matters, and are allocated only tasks commensurate with their skill.

2.6 Corporate Heads of Departments

- Hold ultimate responsibility for health and safety in their department operations and any related activities.
- Ensure implementation of this policy in the departments and activities under their control.
- Ensure the policy is communicated to all their staff and shared with relevant external stakeholders.
- Allocate adequate resources to enable their team to meet its health and safety obligations and objectives.
- Foster a sense of shared responsibility for health and safety across their department.
- Ensure that their staff are provided with adequate and appropriate health and safety information and training, are competent in safety matters, and are allocated only tasks commensurate with their skill.

2.7 Employees

- Follow the principles and expectations outlined in this policy in their daily work and decision-making. Comply with procedures and responsibilities that directly support the objectives of the policy.
- Encourage others to uphold the policy, helping to build a positive and proactive safety culture in their team, department, and ultimately across the organisation.
- Report hazards, near misses, unsafe conditions, and accidents promptly to enable timely corrective actions.
- Participate in HSE-related training and briefings to understand how the policy applies to their role and work environment.
- Contribute to a safe and healthy environment by taking reasonable care of their own safety and that of others.

2.8 Contractors and sub-contractors

- Comply with GEMS Education health and safety policies and procedures.
- Monitor their own health and safety performance and that of their employees and sub-contractors.

3. HSE Framework

The GEMS HSE Management System (HSE-MS) is a framework that ensures effective management and improvement of HSE performance across the organisation. It brings together key policies, procedures, and supporting documents that enable us to identify, assess, and control risks, ensure compliance, and importantly, promotes a culture of HSE awareness and competence. The framework not only helps ensure compliance with all relevant regulations but also aims to go beyond minimum requirements and embed best practices across our schools and entities.

The system is built on four pillars: **Policy, Risk Management, Assurance, and Promotion**. The pillars are adapted from the Plan-Do-Check-Act (PDCA) cycle and ISO 45001 standards and provide a structured approach, while also remaining dynamic to allow for ongoing refinement and potential integration with other management systems such as environmental or quality management. The pillars and some key policies are outlined below.

Policy Leadership commitment & governance	- Health and Safety Policy - HSE Roles and Responsibilities Policy - Needs and Expectations Policy - HSE Objectives and Targets Policy - Legal and Other Requirements Policy - HSE Document and Record Control Policy
Risk Management Identification, assessment & control of risks	- HSE Risk Management Policy - Incident Reporting and Investigation Policy - Fire Safety and Evacuation Policy - First Aid Policy - Contractor Management Policy <i>Several additional policies are also in place to address specific risks and activities – some of which include Food safety, Allergy management, Adverse weather, Electrical safety, Working at height, Chemical safety, Noise management, Workplace violence, Legionella and water quality, Manual handling, Maintenance operations, Housekeeping and hygiene.</i>
Assurance Monitor HSE performance, ensure compliance & drive improvement	- HSE Audits and Inspections Policy - Measuring and Monitoring HSE Performance Policy - Management Review Policy - Management of Change Policy
Promotion Strengthen HSE through training, awareness, communication & engagement	- HSE Communication and Consultation Policy - HSE Committee Policy - HSE Training and Awareness Policy

The GEMS HSE Team will continue to review and update the framework on an ongoing basis, with all documentation managed in line with the [GEMS HSE Document and Record Control Policy \(HSE-POL-05\)](#).

4. References

4.1 Internal References

- HSE-POL-00 GEMS Health and Safety Policy Statement
- GEMS HSE Management System (multiple policies and supporting documents, as referred to in Section 3 above)

4.2 External References

- UAE Federal Law No. 8 of 1980 (Labour Law), Article 91
- UAE Ministerial Decision No. 44 of 2022
- ADOSH-SF Element 9 – Compliance and Management Review (July 2024)
- ADEK School Health and Safety Policy (Sept 2024)
- Qatar Labour Law No. 14 of 2004, Article 100
- Qatar Ministerial Decree No. 3 of 2004
- ISO 45001:2018 – Occupational Health and Safety Management Systems

5. Revision History

Version	Changes/Comments
1.0	Initial policy created and issued for use.
2.0	Updates made but changes not recorded.
3.0	Updates made but changes not recorded.
4.0	▪ Renamed to Health and Safety Policy (removed "Occupational"). ▪ Expanded scope to include application across GEMS corporate activities and GSM. ▪ Updated role responsibilities to ensure accuracy, with broader HSE responsibilities moved to <u><i>GEMS HSE Roles and Responsibilities Policy (HSE-POL-19)</i></u>. ▪ Added HSE framework section to provide context. ▪ Updated references. ▪ Developed standalone poster version of the policy statement, suitable for public display and sharing with external stakeholders.

6. Disclaimer

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Appendix

A copy of the *GEMS Health and Safety Policy Statement* is included as an appendix on the following page.

Health and Safety Policy Statement

At GEMS Education, we are committed to creating and sustaining a safe and healthy environment for all our people — our students, staff, contractors, visitors, and the broader community. We recognise that strong health and safety management is integral to our success and to the wellbeing of everyone involved in our operations.

We aim to embed safety into how we think, plan, and act. Every day, in everything we do. Specifically, we commit to:

- Comply with all relevant regulations and aim higher, setting benchmarks that reflect best practice across our industry.
- Invest in the tools, systems, and resources needed to deliver this commitment effectively across the organisation.
- Maintain and continually improve a robust health and safety management system, including clear processes to identify hazards, assess risks, and act early to prevent harm.
- Champion a positive proactive safety culture through visible leadership and accountability, and genuine care.
- Equip our people with the knowledge, skills, and confidence they need to take ownership of their own safety — and to look out for one another.
- Learn from incidents and ensure that appropriate corrective and preventive actions are implemented.
- Create open channels for consultation and collaboration, empowering staff and stakeholders to play an active role in shaping a safer workplace.
- Set smart, meaningful safety performance indicators, track our progress and use data to drive continual improvement.
- Regularly review health and safety performance, using insights to shape decisions and strengthen outcomes for our people and our communities.



Dine Varkey

Chief Executive Officer