

**PELEAH COMPANY LIMITED  
OCCUPATIONAL HEALTH AND  
SAFETY AND ENVIRONMENTAL  
MANUAL**

PELEAH

limited

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PELEAH Company Limited

## Scope

The scope of this manual applies to all the employees of Peleah Company Ltd and all other third parties under its jurisdiction thereof alongside all areas where she conducts her business activities. By this, all internal and external stakeholders must comply with all contents herein.

## Purpose

Peleah Company Ltd is confident that positive HSE performance is key to ensuring sustainable business and shall thus be considered as integral part in business decision making process. The essence of this policy is therefore to mitigate all potentially hazardous conditions and acts that could harmfully impact personnel, asset and/or environment.

## Policy Statement

Peleah Company Ltd as a responsible business entity is fully committed to ensuring the occupational health, safety and wellbeing of all staff and other parties alongside environment involved in its operations and services and for that purpose it will:

- ◆ Take all reasonably practicable steps to safeguard the health, safety and welfare of all the employees via the application and maintenance of HSE practices and standards to mitigate all forms of work-related hazards, risks, injury and ill-health associated with our activities;
- ◆ Provide sufficient information, instruction, training and supervision to promote awareness and competence amongst stakeholders to avoid events that could endanger their safety, health and the work environment;
- ◆ Provide a system for continual compliance with relevant regulations and standards with a view to sustain a safe and healthy workplace;
- ◆ Adopt and implement a system of accountability via decisive leadership at all levels and the provision of an effective ever improving management system via through consultation and participation of workers;
- ◆ Develop and adopt objectives that would ensure the HSE performance of the organization is continuously measured and improved;
- ◆ This policy statement shall be reviewed periodically i.e. two (2) years and as the need arises.

## Occupational Health and Safety and Environmental Objectives

- ◆ Reduced Lost Time Injuries (LTI) and zero record of fatalities
- ◆ Comply fully with all HSE regulations and full adoption of latest HSE standards
- ◆ Provide general and project specific HSE induction for all personnel

- ◆ Provide at no cost to the employees, relevant Personal Protective Equipment (PPE) and Insulating Protective Equipment (IPE) for all personnel
- ◆ Undertake project risk assessment for all assigned projects
- ◆ Undertake all projects in a manner that is not harmful to the environment
- ◆ Maintain good housekeeping culture at all work locations and project sites

## General Responsibilities

### 1.0 Responsibilities of the Organization

The Peleah Company Ltd as guided by its HSE policy would will comply with its duty to ensure, as far as is reasonably practicable, the health, safety and welfare at work of its employees and of all other necessary stakeholders and, in general, to:

- ◆ Make workplaces safe and without risks to health;
- ◆ Ensure safe work practices services and that safe systems of work are set and followed;
- ◆ Ensure assets are moved, stored and used safely;
- ◆ Provide adequate welfare facilities;
- ◆ Give workers the information, instruction, training and supervision necessary for their health and safety.
- ◆ Provide at no cost to the employees, relevant Personal Protective Equipment (PPE) and Insulating Protective Equipment (IPE) for all personnel

### 2.0 Responsibilities of the Workers and other stakeholders

All employees and stakeholders have the responsibility to observe and comply with the following:

- ◆ To take reasonable care for their own health and safety and that of other persons who may be affected by what they do or do not do;
- ◆ To co-operate with the Peleah Company Ltd on health, safety and environmental matters;
- ◆ To utilize work items provided by the Peleah Company Ltd correctly, including personal and insulating protective equipment, in accordance with training or instructions;
- ◆ Not to interfere with or misuse anything provided for health, safety and welfare purposes;
- ◆ To report at the earliest opportunity injuries, accidents or dangerous occurrences at work, including those involving the public and participants in activities organised by the Peleah Company Ltd.

## Organization of Health, Safety and Environment

### 1.0 Management of Health, Safety and Environment

The Management will create and maintain a functional HSE department headed by a competent HSE Practitioner,

- ◆ to have a broad overview of Health, Safety and Environmental matters;

- ◆ to keep the Peleah Company Ltd.'s Health, Safety and Environment policy and procedures under review;
- ◆ to ensure project sites are inspected;
- ◆ to ensure that risk assessments are carried out;
- ◆ to take such action as may be required to ensure that the company's responsibilities for Health and Safety are fulfilled; and
- ◆ to report to the Management on their performance of these responsibilities.

## 2.0 Procedure for Leadership, Consultation and Participation

### a) Purpose

The purpose of the procedure to establish and assign leadership and worker responsibilities alongside the consultation and participation of workers in the planning, implementation, performance evaluation and continual improvement of the management of Health, Safety and Environment.

### b) Scope

The procedure is applicable to mechanisms deployed to ensure employees and other stakeholders are actively involved the management of health, safety and environment within the organization.

### c) Authority and Responsibility

The MD/CEO is the approval authority for this procedure while the HSE Manager has primary responsibility

### d) Instructions

- ◆ All executives shall take absolute responsibility and accountability for the prevention work-related injury, ill-health alongside provision of the safe and healthy workplace;
- ◆ All employees and other stakeholders shall be duly trained on the significance of HSE and how it integrates with their operations;
- ◆ All executives have the responsibility to provide resources that are required for the management of health, safety and environment;
- ◆ Employees and other relevant stakeholders and representatives shall be duly consulted and participate in all HSE matters;
- ◆ Employees and other relevant stakeholders and representatives shall be involved in the hazard identification and risk assessment process
- ◆ Forums must be created for the regular HSE engagements amongst all stakeholders e.g., Toolbox Talks, Meetings etc.

### e) Refer to General Responsibilities

### 3.0 Procedure for Hazard Identification and Risk Assessment

#### a) Purpose

The purpose of the procedure is to determine the process for identifying all inherent hazards and associated risks involved in our operations with a view to determine appropriate control measures to eliminate/reduce risks to as low as reasonably practicable.

#### b) Scope

The procedure is applicable to all operations, projects and activities within and without(outsourced/sub-contracted) the organization.

#### c) Authority and Responsibility

The HSE Manager has primary responsibility and the approval authority for this procedure.

#### d) Instructions

##### Hazard Identification

- ◆ Prior project commencement, the project team, Project Manager and the HSE Manager shall identify all identify all hazards peculiar to the project to be undertaken.
- ◆ Risk associated with each hazard shall also be identified, collated and documented inclusive of the hazards in the prior step
- ◆ All risks shall be evaluated in accordance with the risk assessment procedure

##### Risk Assessment

- ◆ Risks are to be assessed on the basis of severity and likelihood i.e., probability of occurrence
- ◆ The project team, project manager and HSE manager have shall have a session to assess the risk as per the prior step
- ◆ Severity determines the type and impact of injuries in a risk event while the likelihood speaks to how likely/frequently the hazard/risk would occur
- ◆ Based on these, the risk level is determined via the allocation of a risk rating.
- ◆ To create a broader spectrum for risk evaluation and to ensure as much as possible accuracy, a 5x5 matrix would be utilised.

S/N	Probability	Severity/Impact	
1	Rare	Insignificant	Little or no effect (No LTI)
2	Unlikely	Minor	First aid cases, bruises (LTI is possible)

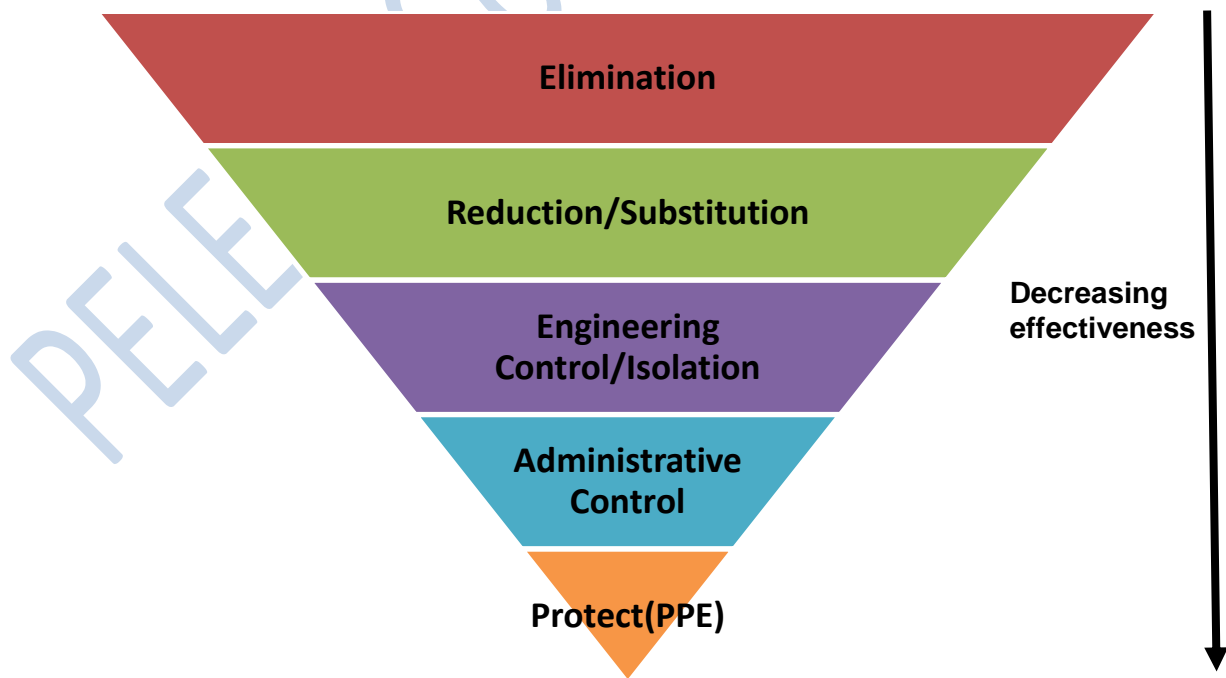
3	Possible	Significant	Medical Treatment Cases (LTI)
4	Likely	Major	Temporary disability, Medical Treatment Cases (LTI)
5	Certain	Catastrophic	Death, Permanent Total Disability (PTD), Property/Equipment loss (LTI)

**Risk Matrix**

Impact	Critical	5	5	10	15	20	25
	High	4	4	8	12	16	20
	Medium	3	3	6	9	12	15
	Low	2	2	4	6	8	10
	Insignificant	1	1	2	3	4	5
Probability			1	2	3	4	5
			Rare	Unlikely	Possible	Likely	Certain

**Method of Control**

- ◆ The hierarchy of controls is deployed when determining the appropriate for a risk that has been thoroughly evaluated and with a risk rating assigned.



Hierarchy of Controls

Risk Level	Treatment
Critical	Stop immediately, report, review and continue if approval is secured
High	Stop immediately, review and revise before continuing
Medium	Monitor closely and manage to mitigate
Low	Monitor
Insignificant	

*It is important to state the HSE Manager reserves the right to incorporate other control measures that may not have been explicitly stated herein following due consultation and participation of the project team.*

#### 4.0 Emergency Response Procedure

##### a) Purpose

The purpose of the procedure is to determine a systemic process to respond to all foreseeable emergencies and control measures to minimize resultant losses.

##### b) Scope

This procedure covers all emergency related situations that could occur as a result or during operations and projects undertaken by the organization. Emergency situations here could be fire, medical emergencies, security threat and structural collapse

##### c) Authority and Responsibility

The HSE Manager has primary responsibility and the approval authority for this procedure.

##### d) Instructions

- ◆ An emergency preparedness and response plan shall be developed and communicated to all stakeholders
- ◆ All stakeholders must be adequately trained on the emergency plans and assigned responsibilities as appropriate
- ◆ Emergency contacts and first responders must be made available to all stakeholders and pasted in conspicuous locations for immediate use.
- ◆ Emergency drills shall be conducted at regular intervals and report of same should be communicated to all stakeholders at all levels.
- ◆ The HSE Manager or any other assigned employee shall initiate the emergency plan in the event an emergency.
- ◆ The HSE Manager shall maintain up to date records of all emergency preparedness and response plan activities to foster evaluation of effectiveness for review and revision as



required.

## 5.0 Procedure for Incident Management (Reporting, Investigation and Corrective Action)

### a) Purpose

The purpose of this procedure is to ensure all incident are reported timely and adequately investigated to determine immediate and root causes with a view to recommend corrective and preventive measures to forestall a recurrence.

### b) Scope

This procedure coverall health, safety and environmental incidents that occur within or under the jurisdiction of the organization.

### c) Authority and Responsibility

The HSE Manager has primary responsibility and the approval authority for this procedure.

### d) Instructions

- ◆ An incident shall be reported to the HSE manager immediately it occurs
- ◆ The incident shall be logged in the Incident Log.
- ◆ The HSE manager shall appoint an investigation team to investigate the accident to outline sequence of events and determine immediate and root causes of the incident
- ◆ The investigation team shall propose corrective and preventive actions plans to prevent recurrence
- ◆ The report of the incident investigation shall be submitted to the HSE manager by the investigation team.
- ◆ HSE Manager shall evaluate the submissions of the investigation to ensure adequacy of the corrective and preventive actions, review where necessary and communicate final write up to management for implementation.
- ◆ The progress of implementation shall be monitored fortnightly and communicate same to management and other relevant parties.
- ◆ HSE Audits shall be performed at predetermined regular planned intervals.
- ◆ The HSE manager and process owners shall ensure all corrective action requests are implemented to close non-conformities and gaps in the management system.
- ◆ The overall effectiveness of the corrective and preventive action plans/requests shall be evaluated by quarterly, reviewed and revised if need be.

## 6.0 Procedure for Communication and Training

### a) Purpose

The purpose for this procedure is to establish the method, recipient and frequency of HSE communication and training.

### b) Scope

This procedure covers all internal and external HSE communication and training in the organization and areas under its jurisdiction.

### c) Authority and Responsibility

The MD/CEO is the final approval authority while the Human Resources and Admin Manager supported by the HSE Manager have primary responsibility.

### d) Instructions

- ◆ All employees on assumption of duty shall be undergo general HSE induction
- ◆ All employees and other stakeholders shall undergo project/function specific HSE training before the commencement of any project
- ◆ Frequency of re-trainings shall be determined by the risk level of specific job function or change in work methodology, technology or management system
- ◆ The Human Resources and Admin Manager shall develop, adopt and implement a training database for the organization
  - The training database shall consist of training needs assessment, training plan and training report summary
- ◆ The HSE manager shall determine relevant and useful HSE information to be communicated to all internal and external stakeholders
- ◆ The HSE manager shall ensure useful HSE information is communicated at regular intervals or as need arises to all internal and external stakeholders

## 7.0 Emergency Preparedness and Response Plan

The following should be in place to ensure the effectiveness of the plan

- ◆ Portable fire extinguishers at all project sites
- ◆ Fully equipped first aid boxes free of ingestible and expired items
- ◆ First responders and easily accessible emergency contacts
- ◆ Means of evacuation preferably a vehicle

- ◆ Risk Register/Risk Assessment Sheet
- ◆ Working on live/energized equipment and without due authorization from the client is STRICTLY prohibited.
- ◆ Physical and immediate supervision must be ensured at all times at the project sites
- ◆ Project schedules shall be strictly adhered to, in the event of a necessary change the client must be informed and approve of the change
- ◆ Toolbox talk must be performed daily, all equipment must be inspected before use alongside PPEs and IPEs
- ◆ A register shall be maintained for all stakeholders at site at all times and only authorized persons should have access to project sites
- ◆ Use of PPE and IPE is mandatory at all times
- ◆ All employees must be trained and retrained on first aid and emergency response
- ◆ Provide health surveillance where necessary

#### **Fire Emergency**

- ◆ Raise an alarm immediately a fire incident occurs
- ◆ If the fire is in its incipient phase, fight the fire with the appropriate fire extinguisher
- ◆ If the fire is beyond the incipient phase, evacuate the premises immediately, closing all doors and windows and converge at muster point
- ◆ Conduct the roll call to account for all on site and alert fire service immediately to put out the fire

#### **Medical Emergency**

- ◆ Rescue victim and administer first aid
- ◆ Alert emergency contact and rush the victim to the nearest medical facility
- ◆ Cordon off the incident area to avoid more casualty and prevent evidence tampering
- ◆ *Refer to Incident Management Procedure*

#### **Security Threat**

Peleah Company Ltd shall ensure utmost security of its internal and external stakeholders via adequate liaison with relevant authorities in all locations under its jurisdiction. Project Managers have the responsibility for the aforementioned in each project location. Project schedules shall be

developed in a manner that does not compromise or pose security threat to all workers at site. In the event of a security threat, observe the following;

- ◆ Alert everyone and move to the safest place
- ◆ Inform relevant authorities
- ◆ Never respond violently to threats
- ◆ Follow the directives of the authorities

### Structural Collapse

- ◆ Evacuate everyone from the area quickly
- ◆ Identify medical cases and ***refer to medical emergency***
- ◆ Alert relevant authorities and follow instructions as directed
- ◆ ***Refer to Incident Management Procedure***

### Alcohol, Drugs and Tobacco

Peleah Company Ltd operates a Smoke and Alcohol-Free policy across the site. The use of drugs (except under medical supervision) is prohibited at all times. The use of intoxicants is prohibited during working hours and no employee may undertake their duties if under the influence of alcohol or drugs, except under medical supervision.