



MONOMARK ENGINEERING (INDIA) LIMITED

HEALTH, SAFETY & ENVIRONMENT POLICY

Management Plan Contents:

Sr. No.	Description
1.0	Introduction
1.1	Purpose
1.2	Scope
1.3	References
1.4	Name of the company and address.
2.0	HSE System
2.1	HSE Policy
2.2	Targets
2.3	Objectives 2.3.1- Health 2.3.2- Safety 2.3.3- Environment
2.4	Duties & HSE Responsibilities of Key Staff 2.4.1- HSE Management 2.4.2- HSE Département's responsibility 2.4.3- Site manager (HSE Responsibility) 2.4.4 -HSE Head (Corporate) 2.4.5- HSE Officer 2.4.6- Responsibility of Site Manager 2.4.7 -Supervisor & Forman 2.4.8- Workmen
2.5	Company General Safety Rules and Safe Work Practice
2.6	Management Accountability
2.7	Orientation / Training 2.7.1-New Employee orientation 2.7.2- Employee Training 2.7.3 -Internal Communication 2.7.4- HSE Meeting
2.8	HSE Enforcement Guidelines
2.9	Hazard / Aspect Control
2.10	Risk Management

2.11	Work Permits
2.12	Personal Protection Equipment
2.13	Health & Welfare
2.14	House Keeping
2.15	Tools & Equipment 2.15.1-Tool (Hand Tools & Portable Tool) 2.15.2-Equipement
2.16	Transportation Management
2.17	Fire Protection
2.18	Inspection of Equipment
2.19	HSE, Inspections & Audit Program
2.20	Accident/ Incident - Reporting & Investigation
2.21	HSE Corrective Action
2.22	Near Miss/Property Damage Investigation and Reporting
2.23	Records Control
2.24	Emergency Evacuation Plan
2.25	LOTOTO (Lockout & Tag out & Try out) Procedure
2.26	Policy statement A) Anti Intoxication B) Biodiversity C) Climate Change D) Energy Management E) Waste Management F) Water Management G) PPE H) Training & Deployment

Monomark Engineering (India) Limited


Director

1. INTRODUCTION

1.1. Purpose

The purpose of this document is to describe how Health, Safety and Environmental issues are managed on Sites / projects by Monomark Engineering (India) Limited (*Formerly known as Monomark Engineering (India) Private Limited*) ("MEIL/Company"), in accordance with the HSE Requirements and HSE Specifications set forth by the Client, applicable international standards and applicable Client/Owner policies and procedures.

This document, MEIL Health, Safety and Environment Management Plan has been developed to ensure that everyone on the Site / project, whether an employee, subcontractor, customer's Representative or visitor has a reasonable level of understanding of his / her individual and collective responsibilities with respect to Health, Safety and Environmental performance. The aim is to ensure that a safe working environment is maintained at all times on project and people are not subjected to unnecessary risk to their health or safety.

Each member of MEIL Site / Project Management Team must ensure that Health, Safety and Environmental Management principles are achieved by:

- Working in accordance with the requirements of the HSE Management Plan and any additional instruction or guidance provided by competent authorities.
- Formally drawing to the attention of the Site / Project management and HSE management any deficiency in procedures, instructions, guidance or specification that could result in inadequate HSE considerations;
- Bringing to the attention of appropriate personnel any feature which could affect the safety of the installation or the protection of the environment, so that all reasonable precautions can be taken to eliminate or minimize its effect;
- Ensuring as a minimum, that the individual responsibilities under current legislation are understood and complied with.

1.2. Scope

This HSE Management Plan shall cover the HSE Management system activities under the supervision of MEIL.

1.3. References

- a. Local National HSE Rules and Regulations as Applicable.
- b. International HSE Standards as Applicable.

(In case of any conflict between this document and any of the above reference Client documents shall prevail).

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1.4. Title of the company

Name: Monomark Engineering (India) Ltd

Address - RIICO Industrial Area

Chittorgarh, Rajasthan, India

Tel : 01472- 255886

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2. SITE HSE SYSTEM

2.1. MEIL. Health, Safety, and Environmental Policy Statement

INTEGRATED HSE POLICY STATEMENT

The long-term business success of Monomark depends on our ability to continually improve the quality of our services and products while protecting people and the environment. Emphasis must be placed on ensuring human health, operational safety, environmental protection, quality enhancement, and community goodwill.

Monomark requires the active commitment and accountability for HSE from all employees. Top management has a leadership role in the communication and implementation of and ensuring compliance with HSE policies and standards. We are committed to:

- Educate, train and motivate employees to carry out task with respect to HSE manner.
- We require Management team and managers to demonstrate leadership in HSE matters in order to develop and maintain a positive HSE culture.
- Commit to the prevention of injury and ill health.
- Prevent pollution, reduce waste & minimize the consumption of natural resources.
- Commit to meeting customer quality requirement and strive to enhance customer satisfaction.
- Meeting all applicable legislation and other compliance obligations.
- Apply our technical skills to all HSE aspects in the design and engineering of our services and products.
- Commit to continual improvement of our HSE Management systems via regularly monitor to ensure its effectiveness.
- Establish effective arrangements for employer/employees consultations and participation.
- Measure, evaluate and certify our HSE performance, wherever applicable.
- We shall set HSE objectives annually, which reflect our commitment to continual improvement in HSE performance and the HSE system.

This policy statement will be made available to interested parties on request. It is also available to the public via our website; It is displayed in the office and other work areas. All employees are encouraged to read it and communicate any query to their line Manager.

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MEIL. has a Health, Safety, and Environmental Management Policy Statement signed by the Director. Refer to Appendix 1 for the detailed Policy Statement.

2.2 Target

MEIL.'s Main Target is to have with **Zero Harm**

Accident	Environmental Incident
0	0

2.3 Objectives

2.3.1 Health:

The immediate objectives are:

- To provide proper First Aid Treatment and the necessary equipment for its administration on site.
- To develop and encourage preventive medical care attitude through increasing Health & Hygiene Awareness.
- To conduct periodic medical inspections (PMIs) so as to ensure and maintain a good standard of health and hygiene.

2.3.2 Safety:

The immediate objectives are:

- To prevent all occupational accidents by implementing the necessary HSE procedures for such purposes.
- To ensure that there is an effective HSE Management System by establishing a comprehensive HSE Organization Chart that delegate's authority and responsibilities.
- To address critical HSE activities at workplace & present methods and procedures for preventing accidents by doing Job HSE analysis.
- To comply with MEIL safety standards or by Contract Document requirements where they are more stringent.
- To promote HSE awareness and consciousness in employees and ensure implementation of HSE procedures through a proper HSE awareness program.
- To establish audits for monitoring the implementation of the HSE Plan and HSE procedures at sites.

2.3.3 Environment:

The immediate objectives are:

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- To implement an environmental awareness program that aims at developing environmentally friendly attitudes and promotes understanding, and acceptance of environmental responsibilities among employees
- To reinstate work areas to environmentally acceptable levels.
- To minimize environmental impacts in accordance with Local Authority Requirements.

2.4 Duties & Responsibilities of key staff

2.4.1 HSE Management

1. The HSE Department of the Company functions under the direction of CEO/COO with sufficient number of HSE officers and HSE supervisor.
2. HSE department is responsible to organize, direct and guide the HSE efforts of the Company in all operational projects/ sites.
3. HSE Department assists the management in developing HSE Policy, and is responsible to give necessary support such as technical information, training compliance reviews and providing updated HSE procedures, in order to administer the HSE policy effectively.

2.4.2 HSE Department's Responsibilities include

- Maintenance of Accident records and analyzing the causes at all site.
- Develop plans & SOP for effective loss control.
- Organizing motivational programs.
- Organizing safety committees.
- Monitoring job site safety status.
- Establishing effective liaison between the client and any other professional society.
- Hazard identification & Preparation of safety plans for construction projects.

The HSE Officer is responsible for the overall HSE Management at site & he will directly report to the site Manager. However, the HSE Officer will keep in touch with the corporate HSE Head at Head office and will inform all HSE related issues. The HSE Officer will investigate and report all accidents and send weekly, monthly and many other relevant reports, Copies of inspection reports, safety reports etc to the site Manager and the HSE Head in order to ensure effective control and monitoring of the HSE policy implementation.

However, any accident/ incident takes place in site it will be reported to the client and investigation is carried out as per client's standard and requirement.

2.4.3 HSE Responsibilities of site Manager.

The Site Manager is responsible for the establishment and implementing of the Project HSE plan. Specially, the Site Manager shall set the pace for the Project HSE Plan & Company safety Program with the HSE Coordinator and shall act as follows.

- Assume full responsibility for HSE activities on the site and maintain liaison with the Client Management.
- Provide full support to the HSE program by enthusiastically advocating the program.
- Delegate responsibilities for HSE promotion.

- Ensure full safety compliance by all departments.
- Establish the job HSE rules with special attention to unusual operations and safety requirements of the client.
- Continuously monitor the projects HSE status and HSE morale.
- Include HSE in the agenda of every project review meeting and give priority for HSE related matters
- Set up HSE incentive programs to recognize and motivate employees.
- Initiate disciplinary actions necessary to develop a good functioning HSE program.
- Ensure that all accidents are reported as per Client's standard and requirement.
- Ensure that accidents receive prompt investigation & reporting and ensure that the necessary corrective action is taken.
- Reprimand any members of the staff failing to discharge satisfactorily the HSE responsibilities allocated.
- Set a personal example on site visits by wearing appropriate protective clothing any by following safe procedures, practices and rules.
- Participate in tool box meetings, orientations and HSE audits periodically.

2.4.4 HSE Head (Corporate)

The HSE Head shall assist the Site Manager with HSE matters, and direct the HSE Officer to promote HSE programs and to ensure all the HSE requirements are satisfied. The HSE Head is responsible for monitoring and administering a proactive overall HSE program designed to provide assistance in recognizing, evaluating, and subsequently eliminating or controlling hazardous acts or conditions. He works in conjunction with the site Manager and assist in the implementation of safety program.

His major roles and responsibilities are to:

a. HSE Strategy & Policy Implementation

- Develop and implement **corporate HSE strategy, policies, and procedures** across all business units and sites.
- Align HSE objectives with **organizational goals and international standards (ISO 45001, ISO 14001)**

b. Regulatory & Legal Compliance

- Ensure company-wide compliance with health, safety, and environmental regulations.
- Liaise with government authorities, regulatory bodies, and auditors.
- Maintain all corporate statutory HSE documentation and permits


c. Incident Management & Investigation

- Oversee incident reporting, investigation, and root cause analysis.
- Ensure corrective and preventive actions (**CAPA**) are implemented across all sites.
- Monitor and report corporate safety performance indicators (**LTIFR, TRIR**).

d. HSE Audits & Compliance Monitoring

- Plan and conduct corporate HSE audits and inspections.
- Ensure closure of audit observations and non-conformities.

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- Monitor compliance with internal standards and external certifications.

e. Training & Safety Culture Development

- Develop corporate HSE training programs for employees and contractors.
- Promote a strong safety culture and awareness throughout the organization.
- Ensure regular safety meetings, toolbox talks, and leadership engagement.

f. Reporting & Continuous Improvement

- Prepare corporate HSE reports, dashboards, and management reviews.
- Analyse safety trends and implement continuous improvement initiatives.
- Drive the organization toward Zero Harm / Zero Accident goals.
- Set up site environmental control measures to protect the environment and mitigate adverse environmental impact of the work.
- Oversee overall implementation of, and adherence to, all MEIL and Client HSE requirements
- Maintain direct communication with Client HSE Manager and site HSE Officer to ensure the safe and smooth running of the site / Project.

2.4.5 HSE Officer.

The HSE Officer is responsible for providing specialist advice and assistance on HSE matters for the Site / Project. He is authorized to temporarily stop any operation which he considers unsafe that poses danger to the lives and properties.

His major roles and responsibilities are to:

- Evaluate potential hazards in MEIL activities and advice on ways to prevent injury to personnel, fires, and damage to plant/equipment.
- Monitor MEIL site compliance with HSE standards, regulations and requirements through site visits and inspections and report and correct unsafe work methods or conditions.
- Co-ordinate accident/incident investigations including determining of causes, recommending corrective actions and follow up. Assess accident trends and review overall safety performance.
- Evaluate use and suitability of Personal Protective Equipment provided, ensure they meet required standards of National and International, and, where necessary make recommendations for improvement.
- Participate in all meeting where HSE is a subject in the agenda and co-ordinate with Supervisors in conducting daily tool box meetings for workforce.
- Prepare and submit the necessary reports relating to the HSE program and supervise the maintenance of all HSE related records.
- Participate in daily HSE briefing conducted during construction and convey information to Supervisors and workers in the tool box meetings.

Maintain HSE promotional activities such as displaying of positive attitude, safety posters, safety slogans, banners, and publication of safety letters or literature

2.4.6 Responsibilities of Site Manager.

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[Handwritten Signature]
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Site inspection to be carried out before the commencement of activities to ensure safety of personal and equipment are in place.

- Informing all Supervisors of their responsibility for safe working methods, in particular to ensure that they do not allow anyone to take unnecessary risk.
- Ensure that work area, machinery equipment, including power and hand tools are maintained in good and safe conditions.
- Ensure that all lifting equipment is in good safe condition, with test certificates.
- Ensure that the COMPANY safety manual, safety plan and accident reporting procedures are well understood by the personnel under him.
- Ensure that procedures and safety instruction shall be strictly obeyed.
- Ensure that safety-warning signs shall be strictly observed.
- Ensure that fooling/horse play is strictly forbidden.
- Ensure cleaning of all work places during and after completion.
- Ensure that pathways are not obstructed by any materials.
- Ensure that no persons leave his location of work without the permission of his supervisor.
- Ensure that employees are issued with appropriate Personal Protective Equipment as required by regulation and site conditions.
- Ensure the correct usage of Personnel Protective Equipment.
- Ensure that Sub contractors comply with the approved safety management plan.
- Ensure that visitors wear suitable protective equipment.

2.4.7 Safety Responsibilities of Supervisor/Foreman.

- familiar with Company HSE program and HSE procedures.
- Be Organize site activities in such a manner that work is carried out with minimum risk to employees, equipment and environment.
- Deliver precise and clear job instructions and correct work methods.
- Execute good housekeeping plan and monitor implementation.
- Make sure that suitable personal protective equipment are available and being used as required.
- Coordinate with site HSE Officer for any Safety Training. Schedule employees to undergo the training.
- Coordinate with site HSE Officer by acting on their recommendations.
- Set personal example by adhering to HSE directives at all times.
- Ensure that site equipment is in good operating condition and necessary HSE measures are observed prior to start its operations.

Be familiar with Client HSE plan and work procedures.

2.4.8 Safety Responsibility of Workmen

- Use right tools and equipment for the job; wear safety equipment and protective clothing supplied e.g. safety belts, helmet, glass etc.
- Regularly attend safety tool box meetings.
- Learn and follow safe work practices- comply with the regulation of the site.
- Keep out from all overhead loads and openings, use proper walkways,

- stairways etc instead of short cuts,
- Avoid throwing tools or materials from height.
- Keep tools and equipment in good condition.
- Report defective or damaged tools and equipment including safety gears.
- Report unsafe situations.
- Be familiar with the locations of firefighting equipment and their operation procedure.
- Report all accidents and near miss incidents immediately to Supervisor.
- Get prompt treatments for injuries.
- Help new employees to learn safe work practices.
- Keep work area clean.
- Refrain from carrying out any action that would endanger him, other workers, equipment or the environment.

2.5 Company General HSE Rules and Safe Work Practices

- Rule # 1 Report unsafe conditions to your supervisor so that necessary corrective action will be initiated immediately.
- Rule # 2 Properly care for and be responsible for all personal protective equipment.
- Rule # 3 Wear hard hat on the job site and where applicable.
- Rule # 4 Use eye and face protection where there is a danger from flying objects or particle, such as when grinding, chipping, burning and welding, etc.
- Rule # 5 Dress properly. Wear appropriate work clothes and shoes. Loose clothing and jewelry should not be worn.
- Rule # 7 Use suitable gloves whenever necessary.
- Rule # 8 Do not operate machinery or equipment if you are not authorized to do so.
- Rule # 9 Never operate any machine unless all guards and safety devices are in place and in proper operating condition.
- Rule # 10 Do not stand or sit in the side of any moving equipment
- Rule # 11 Be alert and keep out from all overhead loads.
- Rule # 12 Keep all tools in safe working condition. , Never use defective tools or equipment. Report any defective tools or equipment to your immediate supervisor promptly.
- Rule # 13 Do not throw tools or materials from height. Never leave them where they may accidentally drop on persons below or in any path where free movement is obstructed.
- Rule # 14 Practice good housekeeping at all times. Keep your tools and surroundings clean and the equipment in its proper place.
- Rule # 15 Use proper aisles, walkways, stairways, roads or other point of egress instead of short cuts.
- Rule # 16 Smoking is restricted in many work areas. Smoke only in the designated areas.
- Rule # 17 Never start new work that is strange to you without proper instruction from the supervisor. Clarify all job-related doubts from him.
- Rule # 18 Comply with all known Government HSE laws as well as employer regulations and policies.
- Rule # 19 All posted HSE rules and warning signs must be obeyed. They must not be removed without authorization.
- Rule # 20 Horseplay causes accidents, so will not be tolerated.
- Rule # 21 All of the Electrical devices or equipment's should be connected with 30mA ELCB
- Rule # 22 Lock out Tag out procedure should be followed as per requirement.

2.6 Management Accountability

- MEIL management is responsible and will be held accountable jointly with the client

for the Safety and Health of all employees and environment on the site / project. Management's objective is an efficient, productive effort that incorporates all elements of Health, Safety & Environment through the participation of management, construction team, employees.

- The HSE coordinator of MEIL is responsible for Health, safety & Environmental compliance for their employees.
- All employees, vendors, suppliers, visitors and MEIL, shall comply with all Site / Project Health, Safety & Environmental policies and procedures.

2.7 Orientation / Training

2.7.1 New Employee Orientation

The following subjects, as applicable, will be covered with all employees prior to starting work assignments. Visitors and vendors will be given a short orientation before being allowed into any construction area, shop or hazardous area.

- a) HSE Policy
 - b) Site safety rules
 - c) Disciplinary Action Program
 - d) Permit system where applicable
 - e) Emergency Evacuation Procedures and Alarms
 - f) Personal Protective Equipment
 - g) Housekeeping.
- Supervisors shall receive in addition to the above the following.
 - Supervisors Responsibility.
 - Tool Box Meetings.
 - Disciplinary Action.
 - Job specific follow-up training will be conducted by the individual's supervisor.

2.7.2 Employee Training

- Required training shall be completed prior to a job task being started, but is not limited to, the following:
 - a) Personal protective equipment
 - b) Emergency alarms and evacuation procedure.
 - c) Working at Heights.
 - d) Job specific training
1. Training materials and method used
 - a) Verbal presentation.
 - b) Written materials, including reference manuals, etc.
 - c) Weekly safety meeting - minutes can be used.

2.7.3 Internal Communication

In order to ensure a timely effective communication of the HSE related issues to all workers on the

site, the following to be complied with:

- All HSE related instructions/issues shall be communicated to workers at site in the common languages Hindi and English.
- Communication shall be performed through the tool box meetings, HSE bulletin boards etc.

2.7.4 HSE Meetings

1. Tool box, HSE Meetings will be held daily and conducted by each supervisor, the HSE representative may support as deemed necessary:

Topics will include, previous period's accident/incidents/investigation results, and specific HSE topics issued by the respective HSE Department.

Employee attendance is mandatory, and discussion is encouraged.

2. Supervisors' HSE Meetings will be held with all supervisors on a monthly basis and conducted by the Site Manager.

Topics will include general areas of concern, HSE program direction, status and topics.

3. Documentation, including employee signatures and HSE topics, etc. will be maintained by HSE Department.

2.8 HSE Enforcement Guidelines.

1. Employee conduct or behavior that does not conform to the HSE policies and procedures is a very serious matter. All infractions will result in action being taken. Due to the diversity of regulations and situations, each case will be handled individually with due consideration for:

- a) Potential for imminent danger to personnel and/or equipment;
- b) Injuries or equipment damage incurred;
- c) The contribution of improper behavior (such as horseplay) to the incident;
- d) Supervisors' prior knowledge of nonconformance.

2. HSE enforcement action for violations that are deemed minor must be progressive, with the intent to alter behavior with proper instruction and counseling. Therefore, the progressive actions below are for minor violations only:

- a) Verbal warning with counseling for first offense;
- b) Written reprimand for second offense. The reprimand will become part of the employee's personnel record. It will specify the consequences of the third offense. The action shall be the suspension/termination of the employee or supervisor for the repeated violation or severity of violation.

3. Supervision/Management shall be responsible for administering disciplinary action. Meanwhile, and to ensure that the positive performance and demonstrated commitment towards HSE on the project / site is encouraged and awarded, the following shall be complied with:

On monthly basis, persons shall be selected as being the employees of the month for their commitment and outstanding performance towards the HSE at site, following employees shall be selected from the following categories:

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- a. Drivers / Operators
- b. Worker Workforce
- c. Site staff /Supervisors

2.9 Hazard / Aspect

Control

Hazard/Aspect

Analysis

Job HSE Analysis (JHSEA)

At the time of task assignment, the task will be analyzed for hazards by the supervisor and the personnel performing the task. Work activities will not commence until all parties are satisfied that hazards/aspects have been identified, and that appropriate measures have been taken to protect the task performer(s), property & environment from the hazards/aspects

2.10 Risk Management

Hazard Identification & Risk Assessment

Risk assessment is a continuous operation and hence central HSE committee shall finalize the risk assessments for all the activities in MEIL and to monitor/ review the appropriate Ness adequacy of the same periodically.

The committee shall consist of senior persons from Mechanical, Process, Civil, HSE and any other specialization found appropriate. All the committee members shall have technical qualification and more than ten years' experience in their respective field. They shall also undergo training about the techniques needed to identify the hazards, assessment procedures and the control measures to be considered.

After the risk assessments are completed and approved by the site management, it shall be circulated to all the employees/ supervisors concerned through the toolbox talks and their feedback shall be communicated to Management Representative for necessary updating, if found appropriate.

All site engineers will refer to the risk assessment sheets before taking up any new activity. If the said activity is not covered under any of the existing risk assessment sheets, they will refer the matter immediately HSE committee, which will refer it to one of the Company members, who is an expert in the field. On getting the risk assessment from the said member, opinion of the safety officer/ manager will be taken before circulating it to the site for obtaining feedback from the field. Meanwhile, if the said activity should be taken up immediately, the concerned engineer can carry out the risk assessment himself and proceed with the work after getting approval from client.

While identifying the hazards, following shall be considered:

- Electrical hazards
- Work equipment hazards
- Pressurized system hazards
- Harmful substance hazards

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- Noise/ Vibration
- Mechanical and manual handling hazards
- Storage hazards
- Environmental hazards
- Access at the place of work
- Fire hazards
- Working at height
- Hazard to non-employees
- Lifting & Shifting
- Confined Space Hazards
- Chemical Hazards
- Others

Risk assessment is based on two factor and, viz. the severity and the frequency of the hazard occurring.

Severity

(Severity of the hazard will be quantified based on the following scale.)

Likelihood

(Likelihood of the hazard will be evaluated based on the following scale.)

Multiplying the severity and the frequency of the said hazard will give us the net risk rating for the particular hazard. These ratings are arrived at first with an assumption that there is no control measure in place.

The residual risk will be arrived at by multiplying the revised (reduced) severity and probability after considering the control measures arrived at in the risk assessment sheets. Risk rating shall be minimized by:

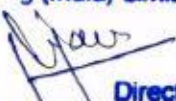
- Reducing the number of persons affected by the hazard
- Reducing the severity of the injury likely to be caused by the hazard and
- Reducing the likelihood of the injury occurring.

The hierarchical process of implementing control measures would be:

- Eliminate the risk by removing the hazard
- Substitute the process with one that is less risky
- Control the risk at source
- Devise safe systems of work
- Provide adequate instruction and training
- Ensure adequate supervision
- Provide suitable personal protective appliances

The residual risk after implementing the control measures shall not exceed (7). In other words, it shall be restricted within the "low" range.

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The risk assessments shall be reviewed based on the lessons learnt from accident / near miss, complaints/suggestions and / or safety audit. Management Representative shall regularize this

review based on the above. Whenever new materials are introduced, new machinery is being purchased for carrying out an existing activity or a new activity the said risk assessment shall be reviewed or new assessment shall be made. Purchase department will inform Management Representative regarding such occasions and Management Representative will take necessary action.

Whenever the severity rating of an activity remains 5 or 6, even after the control measures are put in place, (i.e. the residual risk) the said activity will be categorized as "Critical activity." Such activities will be taken up either with a "permit to work" or with the presence of a responsible supervisor.

Similarly, if the control measures prescribed in the risk assessment form is only the usage of PPE (to reduce the risk rating be make it "acceptable") it will be classified as a critical activity since non- use of the said PPE or failure of it will directly expose the technicians to an unacceptable level of risk.

Risk assessment will be reviewed in site HSE committee meeting at least once a year to review the overall management of this important aspect of our HSE Management System.

2.11 Work Permits

1. A work permit system is identified and in place for the following if required:

(Client permit system shall be used as applicable if any).

- Hot work
 - Confined Space Entry
 - Work at height
 - Electrical Work
 - Excavation Work
 - LOTO permit
 - Others as per job requirement
2. The work permit systems will assess specific potential hazards/aspects on a task-by-task basis. The information acquired from this assessment will be used to determine appropriate work practices and personal protective equipment for the task. Permits shall be used where applicable.

2.12 Personal Protective Equipment

The HSE Manager will specify the PPE requirements for each category of work.

- MEIL shall provide their employees with necessary and well-maintained or new PPE.
- Employees working at site shall properly wear and use safety harnesses, safety shoes, goggles, earmuffs, and other PPE according to the job requirements.
- All PPE shall be regularly maintained and kept in good condition.
- Worn-out or damaged PPE shall be returned for repair, or for replacement.
- Training will be given to the users of PPE either where required by regulations or when a specific skill is required to use the PPE.
- Training for use of ordinary PPE is given during the Induction Training for new entrants, and specific PPE training, such as for using respirators, is given by HSE department or competent as designated by the HSE Officer.

- Basic PPE required by all MEIL employees, visitors, suppliers and vendors shall be hard hat, safety glasses, steel/fiber toed footwear and proper dress.
- Hazard/aspect assessments to determine appropriate personal protection equipment are conducted by the front-line supervisors prior to each work assignment during the Risk Assessment process.
- Hearing protection shall consist of: Ear plugs and/or ear muffs where applicable.

2.13 Health & Welfare

An integral part of our HSE plan is to ensure facilities are in place to ensure the health and wellbeing of our workmen. These include but are not limited to providing adequate toilet facilities, adequate drinking water, shaded rest areas, first aid facilities as well as training and safety information.

These procedures and arrangements are based on both legal requirements and a desire to not only ensure people's Health and Welfare but to ensure people feel confident that these issues are paramount within our HSE plan.

The welfare begins by ensuring that all staff receives all necessary information to reduce risks that they may be exposed to during their time spent at site. This information is given in several different methods which include the following:

- **Safety Induction on arrival.**
- **Regular Tool Box Talks.**
- **Daily HSE Briefings, these will include discussion of all method statements and their attached risk assessment and control measures.**
- **Posted Safety Notices.**
- **Regular Safety Meetings.**

The staff is going to be faced with tasks that present specific risks, each of these risks will be identified at the time of generating the method statement. Attached to the method statement/SOP/WI will be a risk assessment highlighting both the risks and the control measures to be used.

A summary of the identified tasks with potential risks can be found in section 2.10 titled Hazard / Aspect Control. Each of these risks will be addressed in full within the method statement.

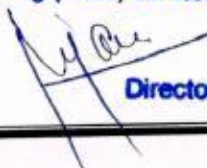
2.14 House Keeping

The work area has to be kept neat, it encourages safe work habits. Major orderliness and housekeeping aspects are:

Tools and working materials in proper storage.

1. Trash and scrap in the correct containers.
2. Materials stored safely.
3. Small items in boxes or bins.
4. Floor clear of tools, rod ends, scrap and metal scrap.
5. Walkways clear.
6. Work tables occupied only by work at hand and tools required for work being done.
7. Materials stored or contained so that fire has no place to start.
8. Maintain 5S at workplace.

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2.15 Tools & Equipment

2.15.1. Tools

a. Hand Tools.

- Every tool is designed to do a certain job; the tool to be used only for its intended purpose.
- Hand tools must be kept in peak condition, sharp, clean, oiled, dressed, and not abused.

b. Portable Power Tools/Cords

1. Power tools must only used by trained persons.
2. Electrical connections and extensions must be properly made.
3. Proper eye and hand protection must be used and people working around must be warned as flying objects can result almost from operating any power tool.

2.15.2. Equipment

Only safe equipment can be used. It is the responsibility of the Supervisor & Operator to inspect the equipment before using it, in case of doubt over safety of the equipment advice should be sought from the HSE officer. If the equipment becomes defective in any way, placing a "DEFECTIVE DO NOT USE" tag on it and taking it out of service is required.

Regular inspection or Third party inspection(As per requirement) for the equipment must be performed to ensure suitability & capability. (e.g. safety harness, Lifting tools and tacklees ladders, scaffolding, barricades, hole covers, signs, welding & burning equipment, compressors, power equipment & motor vehicles. etc.)

2.16 Transportation Management.

- All drivers have to be competent, must have valid Driving License.
- All drivers must comply with **Client** and Indian Traffic regulations.
- Drivers shall utilize the identified routs.

2.17 Fire Protection

- Fire extinguisher and related fire protection equipment shall be maintained and inspected by the HSE Section.
- Employees shall receive initial training in the use of fire extinguishers prior to assignments during HSE orientation where applicable.

2.18 Inspections of Equipment

1. All equipment/vehicles/trucks/, etc. shall be inspected periodically by HSE officer and authorized to be satisfactory for operation, including the availability of safety related items (horns, lights, screens, lock-up alarms, guards, etc.). (This includes any and all pieces of equipment that has a motor, gas or diesel driven)
2. Inspection of shops, fabrication areas, storage areas, construction area, warehouse, etc. are the responsibility of the direct supervisor and HSE officer to ensure Safe, Healthy & Environment friendly

conditions and activities in these areas are adhered to.

3. Inspection of all areas will be conducted daily by the supervisor / site manager / Site Incharge .
4. Inspections conducted as specified above will be documented with all unsafe acts and conditions correct immediately or action taken to guard the hazard with corrective action and date for each discrepancy noted.

2.19 HSE Inspection/ Auditing: Program

A "HSE Inspection Program" will be tailored for each site needs during mobilization. The following points will be addressed in more detail in the HSE Inspection Program prior to start the actual work:

- Hierarchy of inspections and audits.
- Joint Client/ Contractor audits.
- Internal audits.
- Program of HSE inspections by HSE Coordinator.
- Program of HSE inspections by line supervisors.
- Inspection timetable.

Supervisors and the HSE Representative shall conduct weekly site inspections in each work area. The Project / Site Manager who will ensure that remedial advice is implemented will review the results of the inspections and the remedial actions to rectify unsafe conditions or practices found

during the inspections. HSE Coordinator shall be copied on all reports relating to these inspections and HSE staff shall attend these meetings.

2.20 Accident/ Incident Reporting & Investigation

- Accident/ Incident investigation involves the methodical examination of an undesired event that did, or could, result in physical harm to people; or damage to property and the Environment.
- Investigation activities are directed toward defining the: facts and circumstances related to the event, determining the causes and developing remedial actions to control the risks.
- A procedure is in place to ensure that all personnel are aware of what is to be reported and investigated, and when. The data to be provided by following the procedure requirements will enable a thorough analysis to be performed, which will determine the basic or underlying causes.

The benefits of effective reporting of accidents/incidents include:

- Assurance that all accidents/ incidents will be investigated.
- Discovery of the causes.
- Reduction of recurrences.
- Identification of program needs.
- Provision of information in case of litigation.
- Overall program improvement.
- Increase of production time and reduction of operating costs.

2.21 HSE Corrective Action

- The Accident / incident investigation and analysis is ineffective if remedial action is not carried out.

A written procedure is in place to delegate responsibilities and time frame to ensure that Non-Compliance Reports are closed as per the corrective actions recommended.

- All accidents / incidents shall be reported to the Site Manager and HSE Head within 24 hours of occurrence.

2.22 Near Miss and Property Damage Investigation and Reporting

- Near Miss: An incident that, under different circumstances, could have resulted in harm to people, property and/or to the Environment .
- All near misses shall be reported within 24 hours or within the next working day. A preliminary report detailing the description of the near miss or property damage is to be recorded.
- A final report describing the facts of the near miss or the property damage is to be prepared along with the lessons learnt.
- The above reports must be documented and kept on file.
- A Verbal report of the incident must be made immediately to the Client by supervisor/HSE officer / Site manager within 1hr.
- A Preliminary written report must be submitted within 24hrs to the client.

2.24 Record Control

- Client -required Documentation
- All Clients required documentation and reporting will be complied with.
- **MEIL**. shall maintain all required Project/Plant Health, Safety & Environmental Documentation.
- All subcontractors shall maintain and submit to **MEIL**. required documents and reports as requested.

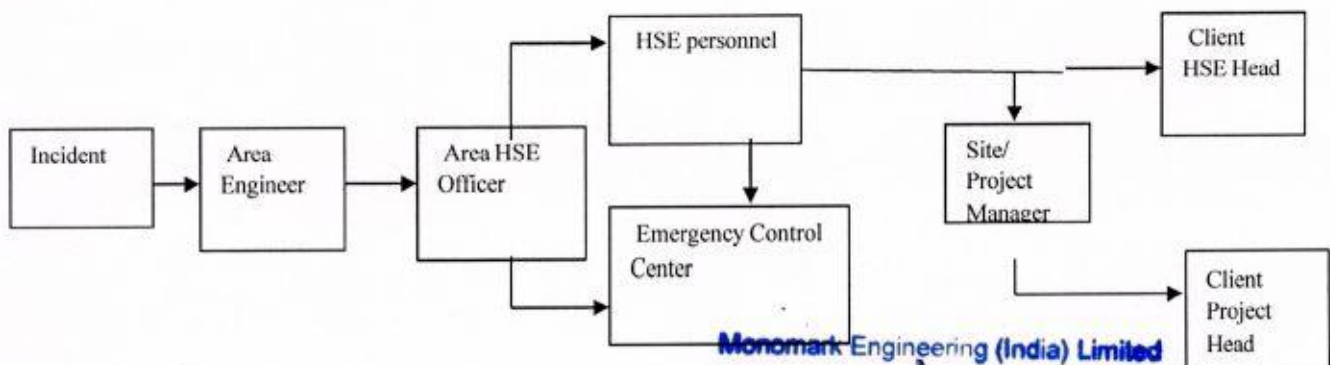
2.25 Emergency Response Plan

Emergency

An emergency means a situation arising out of or as a result of any type of hazards like fire, explosion, uncontrolled gas release, or chemical spill which is likely to adversely affect the person or population working on or near the site, or residing in the adjacent or nearby areas around the work site.

The List of emergency facilities available at site are as follows:

1. First Aid facility.
2. Rescue Vehicle.
3. Trained first Aid personnel from the working group & supervisor.
4. Fire Extinguisher Placed at different locations (both DCP & CO2 type).
5. Emergency Assembly Points.



General Evacuation Procedures

[Signature]
Director

1. When the alarm is sounded, all personnel within their working area stop work, switch off running plant and equipment.
Proceed to the nearest and safest identified assembly point swiftly (Don't run), while leaving the workplace.

2. Section In charge

- Do a quick count by asking all about their colleagues.
- Report all missing employee and someone gone for other work, to Timekeeper.

Head Counting System - Overall responsibility is of Time Keeper to do head count at earliest with the help of Section In charge everybody whose colleagues is missing to provide information.

Section In charge at each assembly point, will co-ordinate the head count.

The final count is then reported to Site Manager who would inform the emergency services of any missing personnel.

Visitors, Sub contractor and site workers are to be accounted for leading them to nearest assembly point.

Duties of HSE Officer:

1. On discovering the emergency, ensure the alarm is sounded, and then inform the site Manager.
2. On hearing a fire alarm, ensure that the site is completely evacuated (including checking toilets, storerooms or any other special areas) and that employees and visitor proceed in an orderly manner to the assembly point.
3. Once at the assembly point, remind the timekeeper not to allow the workers to reenter the affected area. Contact the Site/Project Manager to advise that all occupants have been evacuated and give any further relevant information on the status of emergency.
4. Obey all instruction given by site Manager.

2.26 Lockout & Tag out (LOTOTO) Procedure

Scope

This procedure defines the minimum requirements for locking, tagging, and trying, systems of energy sources, including stored energy, or placing electrical equipment in an electrically safe work condition to allow work without injuring employees or damaging equipment. Electrical and non-electrical lockouts differ significantly in purpose:

-Electrical lockouts control exposure to electrical hazards, by protecting an employee from exposure to potential electrical energy or by restricting an employee's contact with an existing electrical hazard. A qualified person shall be involved in the planning and implementation of electrical lockouts.

- Non-electrical lockouts control potentially hazardous energy, by completely eliminating hazardous energy from the system where personnel will be working. An authorized person shall be involved in the planning and implementation of nonelectrical

Lockouts

General

Use lockout locks with danger tags only to prohibit operation of process and electrical equipment when personal injury or property damage could result from operation. Danger tags and lockout locks shall be used for no other purpose. Tag out procedures involving danger tags only are generally not permitted.

Discipline

Devices with lockout locks and/or danger tags must NOT be operated. Any person who willfully violates this procedure or operates a switch or other device that has a lockout lock and danger tag attached will be subject to removal from the site.

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Preparation for Lockout/Tag out

Review appropriate current drawings (or other equally effective means), tags, labels, and signs to identify and locate all energy isolating devices. Make a lockout list of energy isolating devices to be locked/tagged. Review energy isolating devices to determine adequacy of their isolating or interrupting ability. Review other work activity in the area that may be impacted by the lockout to determine if other personnel may be exposed to energy sources or electrical energy hazards. If any exposure is identified apply the appropriate energy control methods.

Removing Lockout and Danger Tags of Absent Personnel

No person shall remove another employee's lockout lock and danger tag except when all of the following conditions are met:

- 1 The owner is off the site
- 2 The owner cannot be contacted or cannot return to remove his/her lockout lock and danger tag
- 3 The removal is approved by the site manager
- 4 The system is visually inspected to verify that the system is safe to unlock when the site manager is not on site, he/she may designate a person to be responsible to remove the lockout locks and danger tags of absent site personnel according to this section.

If a lockout lock and danger tag are removed during the absence of the owner (the person who signed the danger tag), the owner must be notified before he/she resumes work. The owner must verify that his/her lockout lock and danger tag are in place at the beginning of his or her next shift. Dismantling equipment with a lockout lock and danger tag attached is considered the same as removing a lockout lock and danger tag without authorization.

Training

Each site must establish a program for training each site employee on this procedure. The training must include information about the types and degrees of hazards the employee will be exposed to at work.

2.27 Policy statement

a) Anti Intoxication

For the purposes of this policy, the following are strictly prohibited:

- ❖ Being impaired by or indulged in taking or distributing Alcohol/Drugs /Tobacco /Bidi /Cigarette smoking or any other intoxicant while at work.
 - ❖ The possession or use of any intoxicating substance on Company premises, at Company worksites, or in Company vehicles.
 - ❖ The presence in the body of any intoxicating substance (or their metabolites) while at work.
- b
- ❖ Refusal to submit to drug/alcohol testing, failure to report at a Company-designated facility for a drug / alcohol test, or tampering or attempting to tamper with a test sample.
 - ❖ Any staff (including managers & supervisors) having knowledge of such prohibited conduct, who ignores & fails to correct it and comply with this policy, will be subjected to disciplinary action, including dismissal from the company in accordance with respective labour laws.

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b) Biodiversity

The Company shall strive to:

- ❖ Prevent, minimise and mitigate biodiversity risks throughout its businesses.
- ❖ Manage and use natural resources in a manner that allows biodiversity conservation needs to be integrated with business needs;
- ❖ Comply with the local, regional and national legislative requirements on biodiversity conservation wherever applicable in there as where it operates;
- ❖ Identify and assess biodiversity status and value before the start of a project and monitor impacts over the project lifecycle;
- ❖ Work towards the conservation of threatened/rare and endemic species and high priority conservation areas, and support local& national conservation initiatives.
- ❖ Commit to providing information and raise awareness among our employees and other stakeholders to enhance knowledge and understanding of biodiversity and conservation issues, where applicable.
- ❖ Work towards achieving "No Loss of biodiversity" in all operations and at places where critical habitat is present.

Achieve Net Positive Gain (NPG) of biodiversity for a healthy ecosystem

c) Climate Change

For achieving the objectives of this policy our company is committed to:

- ❖ Establish strategies and programs to reduce the carbon footprint of our operations, supply chain and products by improving energy and water efficiency, addressing commodity-driven deforestation, and increasing our use of renewable energy;
- ❖ Set both short and long-term science-based goals for Green House Gas (GHG) emission reductions, and work towards powering our operations with renewable energy;
- ❖ Engage our suppliers and associates to improve transparency and collaboration, and minimize the environmental impact—including the carbon footprint of our purchased goods and our products and services;
- ❖ Work towards responsibly handling and abating climate change and environmental degradation;
- ❖ Improve the assessment of our business risks associated with a changing climate and integrate them into our risk mitigation programs, business continuity, and capital planning programs to ensure that we can continue to meet our client's needs sustainably;
- ❖ Ensure compliance with all relevant legislation and regulations while advocating for a sound climate policy intended to achieve a low-carbon economy, and abate climate and human health risks; and work with partners to advance efforts that improve climate health and related human health outcomes.

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d) Energy Management Policy

Company's objectives as related to this policy are as follows:


- ❖ Company shall work towards continuously improving energy performance.
- ❖ We will establish specific implementation plans and will make significant achievements in this area.
- ❖ Provide the best possible environment for occupants of our facilities, while simultaneously taking care of energy performance.
- ❖ Reduce operating expenses and increase asset values by actively and responsibly managing energy consumption.
- ❖ Demonstrate commitment to our community and leadership in the Engineering industry, by reducing pollution associated with energy use.
- ❖ Reduce energy consumption in existing processes.
- ❖ Design and implement all new energy savings initiatives.
- ❖ Reduce carbon emissions associated with energy consumption.
- ❖ Our efforts to reduce energy use and prevent pollution will also support our commitment to our employees, the environment, and the communities in which we are a part

e) Waste Management Policy

Company's objectives for this policy are as follows:

- ❖ To ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects.
- ❖ To minimise waste generation at source and facilitate reduce, reuse and recycling over the disposal of wastes in a cost-effective manner.
- ❖ To provide clearly defined roles and responsibilities to identify and co-ordinate each activity of the waste management.
- ❖ To promote environmental awareness in order to increase and encourage waste minimisation.
- ❖ To invest into the expansion for the transformation of waste wherever possible, into value added products leading to optimal utilization of resources.
- ❖ To ensure the safe handling and storage of wastes at respective sites.
- ❖ To provide appropriate training to the Employees and other stakeholders on waste management issues.
- ❖ To promote holistic approach of waste management in the company.

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f) Water Management Policy

In order to achieve this, the Company will:

- ❖ Monitor and measure water usage across the working sites & units in order to identify the most significant areas of use and prioritize these areas for reduction measures.
- ❖ Monitor for leakage and repair leaks quickly.
- ❖ Set water consumption limits.
- ❖ Communicate this policy to employees and motivate them in achieving set targets for Water conservation.
- ❖ Install water saving devices for employee washing and toilet facilities.
- ❖ Investigate new developments in technology and plant, which may help to increase the efficiency of water use.
- ❖ Continue to operate closed water systems within our operations and workings in order to reuse as much water as possible.

g) Personal Protective Equipment (PPE) Policy

Objective of the Policy:

- ❖ All People shall wear Personal Protective Equipment at site except inside covered vehicles, designated rest areas and site offices.
- ❖ We will provide all required Personal Protective Equipment (PPE) free of charge, to our employees.
- ❖ In normal conditions any person entering inside site premises shall wear safety helmet, safety Jacket, Safety spectacles, and safety shoes.
- ❖ All PPE are according to BIS/DGMS/CE specification and maintained in good condition.
- ❖ All Personal Protective Equipment such as safety spectacles, hardhats, rubber boots and respirators are sterilized prior to reissue.
- ❖ All employees are properly trained on the use, care and limitations of the equipment prior to start of the job.
- ❖ All employees engaged for their job have to wear safety helmet with chin strap.

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h) Training & Development Policy

This Includes:

- ❖ High standards of work performance, for which training and appraisal system has been placed in the company.
- ❖ Training programs related to safe working practices, First Aid, hazard identifications, Emergency procedures etc.
- ❖ To conduct SAFETY CHAUPALS for refreshment purpose and building cultural change for awareness.
- ❖ Broad understanding and appreciation off actors affecting work performance, so all our employees are deployed to job only after they meet our expectation regarding JSA requirement of onsite job.
- ❖ Sharing ideas and knowledge base of good practices.
- ❖ Effective management and implementation of change, since change is inevitable and constant, so our employees are educated to get acquainted and adopt themselves to change.
- ❖ Building strong and effective teams to include healthy competition at workplace.
- ❖ Increase motivation by participation in cliental induction, competitions, debate for individual's overall professional development.

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