

	HEALTH, ENVIRONMENT and SAFETY MANAGEMENT SYSTEM (HESMS)	HES Dept.
	<i>Document Title</i>	<i>Document Owner</i>

HEALTH, ENVIRONMENT and SAFETY MANAGEMENT SYSTEM (HESMS)

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1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	(signed) S Carangalan	(signed)	(signed) A Meakin	First issuance
1	05 Jan 2015	(signed) H Nuñez	(signed) K Richardson	(signed) A Meakin	Frequency of training added
2	01 Dec 2018	(signed) M Caceres	(signed) K Richardson	(signed) A Meakin	Revised the evaluation period from 1 year to 3 years.
3	30 May 2021	 M Caceres	 K Richardson	 A Meakin	Renamed from HESPP (Policy and Program) to HESMS (Management System)

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2. PURPOSE

ELITE Construcciones S. L. Health, Safety and Environment Policy & Procedures have been developed to establish minimum requirements and guidelines to ensure that every work performed and completed by Elite's team of dedicated personnel are safe and ensures protection of its people, the community and the environment.

The HES Policy & Procedures provides practical information and guidance on how managers, supervisors, and employees can work together to achieve a safe and healthy work environment. The Policy & Procedures herein will assist to attain compliance with:

- Relevant statutory legislation and codes of practice
- Company policies and workplace standards
- Common law duty of care
- Recognised HES best practices

The processes outlined in the HES Policy & Procedures are designed for use as integral component in operating the business to its maximum potential. An organised approach to HES management is an essential contributor to ensuring the staff, contractors and clients can do business safely.

The primary responsibility for ensuring HES standards are implemented within ELITE Construcciones SL is with the Company Directors, and the Management Team. However, all employees and contractors have responsibilities in creating a safe work environment.

ELITE Construcciones SL places an emphasis on pro-active hazard and risk management to eliminate or minimise workplace incidents and injuries. Effective hazard and risk management leads to measurable improvements in workplace safety with subsequent increases in productivity and profitability.

The HES Policy & Procedures should be used as the basis for establishing a workplace hazard and risk management program. It is essential that managers and employees consult together to develop HES plans that meet the standards contained in this manual.

2.1 Policy Review

This health and safety policy will be reviewed every three years to ensure that the policies are up to date.

2.2 Dissemination of Policy

This policy shall be reviewed or discussed to the crew based on the minimum orientation requirements as stipulated in this manual.

Copy of the policy will be stored at the HES office and can be reviewed by the crew any time.

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3. HES AIMS

ELITE Construcciones SL aims to:

- Continuously improve the management and standard of HES systems in the workplace for all employees, Temporary staff, contractors, visitors and clients to ELITE Construcciones SL to comply with the most recent regulations, industry best practices and
- Provides a safe and healthy workplace for employees, temporary staff, contractors and clients to our workplace.
- Increase employee, temporary staff, contractor, visitors and client awareness and understanding of their personal responsibility and accountability in regards to HES.
- Reinforce a culture of safe working practices in the workplace.
- Reduce or eliminate the workplace incidents and injuries.
- Return injured employees to the workforce at the earliest opportunity
- Reduce the cost of accidents and injuries to the business.
- Promote welfare of employees.
- Consult with employees on HES issues.

3. HES POLICY AND PROGRAM FRAMEWORK



3.1. ELITE Developed Policy

- 3.1.1 Health and Safety Orientation Policy - Please see HES - 001 policy
- 3.1.2 Drug and Alcohol Policy – Please see HES – 003 policy
- 3.1.3 Incident Investigation and Reporting Policy – Please see HES – 007 policy

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- 3.1.4 Emergency Notification Plan – Please see HES – 012
- 3.1.5 Safety Management System Audit – Please see HES 015
- 3.1.7 Job Safety analysis – Please see HES – 017
- 3.1.8 Workplace First Aid and CPR Program – Please see HES – 020
- 3.1.9 Safe Work Permit System – Please see HES – 026
- 3.1.10 Respiratory Protection Program – Please see HES – 027
- 3.1.11 Security Policy - Please see HES – 010
- 3.1.12 Malaria Control Program - Please see HES - 031

3.2. ELITE Developed PLAN

- Form a team, for the purposed of this standard the team described here as the workers and the management.
- Analyse company’s compliance with the HES legislation and regulation
- Review Company accident history
- Develop health and safety goals
- Obtain Senior management commitment
- Obtain necessary resources
- Develop rules, practices and procedures
- Get a professional review & evaluation

3.3. ELITE Developed PROGRAM

- HES Policy Statement
- Roles and Responsibilities
- Hazard Assessment, Analysis & Control
- Safe Work Practices / Safe Job Procedures
- Company Health and Safety Rules
- Personal Protective Equipment
- Tools & Equipment Maintenance
- Training, Orientation & Communication
- Workplace Inspections
- Accident Investigation & Reporting
- Emergency Preparedness
- Statistics & Records
- First Aid
- Return to Work

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3.4. ELITE IMPLEMENTED the program

- Announce program & distribute copies
- Instruct employees in their responsibilities
- Provide guidance, training and follow-up
- Develop accidental reporting/investigation system
- Establish corporate & jobsite committees

3.5. ELITE EVALUATED the program

- Review key elements frequently
- Identify weakness in the program
- Ensure deficiencies corrected promptly
- Compare Statistics from previous years
- Involve supervisors and HES representatives

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4. HES POLICY AND PROGRAM DEVELOPED

4.1. ELITE HES POLICY STATEMENT

HSE POLICY STATEMENT

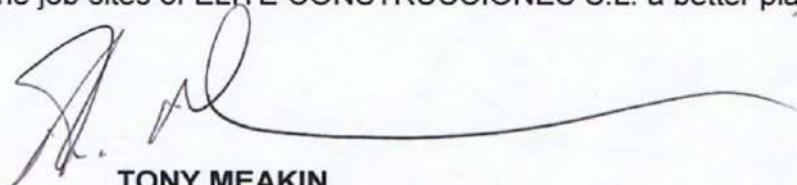
The Management of ELITE CONSTRUCCIONES S.L. is committed to the health and safety of its employees and for all who are involved in our projects. Protection of employees from injury or occupational disease is a major continuing objective. We are committed to continuing improvement toward an accident-free workplace through effective administration, education and training. All supervisors and workers must be dedicated to the continuing objectives of eliminating the "near misses" which will greatly reduce the risk of injuries.

Our philosophy is that the well-being of our company and clients is dependent on the health and safety of our workforce. The Management of this company promises that every precaution reasonable in all circumstances will be taken for the protection of all workers. No job is to be regarded so urgent that time cannot be taken to do it in a safe manner. The welfare of the individual is our greatest concern.

In fulfilling this commitment, management will provide and maintain a safe and healthy work environment, in accordance with industry standards and in compliance with legislative requirements, and will strive to eliminate any foreseeable hazards which may result in property damage, accidents, or personal injury/illness.

We recognize that the responsibility for health and safety are shared. All employees will be equally responsible for minimizing accidents within our facilities and on our work sites. All employees will perform their jobs properly in accordance with established procedures and safe work practices.

Your attitude and cooperation in the promotion of accident prevention will assist in achieving our goal to make the job sites of ELITE CONSTRUCCIONES S.L. a better place to work.



TONY MEAKIN
 MANAGER
 ELITE CONSTRUCCIONES S.L.

Date: 16th MARCH 2012

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4.2 ROLES AND RESPONSIBILITIES

4.2.1 Overview

ELITE Construcciones SL has obligations placed upon it to provide a safe and healthy workplace and environment for all employees and others. Due to the legal, moral and business implications of non-compliance with HES legislation, codes of practice and company standards, all ELITE Construcciones SL managers, supervisors and employees have a significant role to play in the provision of a safe and healthy work environment.

4.2.2 Benefits

Assigning specific roles and responsibilities to those involved at the workplace will help ensure that ELITE Construcciones SL aims are realised. Flow on benefits will include a reduction in Workplace hazards and risks, leading to the minimisation of injury.

4.2.3 Employer Obligations

An employer must ensure the health, safety and welfare at work of all the employees of the employer. ELITE Construcciones SL believes that employers have 2 broad duties. Those broad duties are:

4.2.3.1. Employers have a duty to ensure the health, safety & welfare of all employees at their workplace. This includes looking after such matters as:

The place of work controlled by the employer where the employees work (and the means of access to or exit from the premises) are safe without risks to health

- Ensuring that any plant or substance provided for use by the employees is safe and without risks to health when properly used
- Workplace systems and workplace environment
- Providing information, instruction and training to existing and new staff
- Providing adequate facilities for employees

4.2.3.2. Employers also have a general duty to make sure that other persons ordinarily at their workplace, such as patients and their families in the case of medical practices are not exposed to health & safety risks.

Specific Duties:

Employers must identify any foreseeable hazards that could affect their staff, or any other person at their practice.

Once a hazard is *identified* you must assess the risk of harm to the health and safety of yourself, and any other person legally present at your practice, which arises from the hazard.

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You must *eliminate* risk identified and if it isn't reasonably practical to eliminate the risk, you must control it. In order to eliminate the risk, you must take the following steps, in order, until the stage where the risk is effectively controlled:

- a. Substitute the hazard
- b. Isolate the hazard
- c. Minimize the risk of hazard by engineering means (protective guards, handrails etc)
- d. Minimize the risk of hazard by administrative means (training, instruction, warning signs etc)
- e. Supplying personal protective equipment

4.2.4 General Manager Responsibilities

General Manager is responsible for safety across the whole business.

The General Manager will take reasonable steps to ensure compliance is achieved, by ensuring every manager and employee has a Safety Objective to achieve, there is adequately trained resources to address and deal with HES matters and that funds are available to correct any potential hazards in the business.

4.2.5 Senior Management responsibilities

Management will work with employees in pursuing the following courses of action:

1. Observing statutory and ELITE Construcciones SL standards
2. Providing and maintaining a safe and healthy working environment
3. Providing suitable means of access and egress to workplaces
4. Developing, implementing and improving safe work systems
5. Monitoring factors that may affect employees' occupational health, safety and welfare
6. Providing safe facilities and equipment and ensuring it is maintained in a safe condition
7. Recording and investigating accidents and incidents and implement appropriate corrective actions
8. Promptly and effectively dealing with occupational injury and ill health by managing occupational rehabilitation programs
9. Providing adequate welfare facilities for employees

4.2.6 HES Department Head responsibilities

Provide professional HES advice to ELITE Construcciones SL management and employees in such matters as:

- Comply with HES legislation
- Applying sophisticated hazard and risk management techniques to eliminate / reduce risk
- Maintaining a records of workplace incidents and injuries

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- Making recommendations aimed at eliminating workplace injuries
- Identifying HES related training needs

The HES Department Head is the subject matter expert and is responsible for:

- Developing HES strategies, planned and management systems to meet or exceed OSHA legislative requirements
- Providing expert advice and guidance to leadership in all HES matters relevant to ELITE Construcciones SL.
- Developing, implementing and monitoring HES policies and procedures in accordance with relevant OSHA legislation
- Promoting and facilitating the integration of HES into all areas of operation
- Providing leadership with appropriate direction and framework to support its HES goals and objectives
- Ensuring there is appropriate planning, development, implementation and monitoring of HES programs across the wider ELITE Construcciones SL business operation.

4.2.7 Supervisors / Team Leaders responsibilities

- Ensure employees are provided with proper information, instruction, training and supervision to enable them to perform their work in a safe manner.
- Communicate and consult with employees and/or, health and safety representatives and HES committee.
- Identify, assess and control workplace hazards and risks.
- Report, record and investigate incidents and injuries.
- Supervise and monitor the rehabilitation of injured employees
- Undertake workplace inspections using “General Workplace Hazard Identification Checklist”
- Actively participate in HES issue resolution with employees
- Report to Management Team on HES performance and procedure improvements
- Cooperate in HES audits and correct notes deficiencies

4.2.8 Employees Role and responsibilities

4.2.8.1 Employees Duties

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4.2.8.1.1. An employee must, while at work take reasonable care for the health and safety of people who are at the employee's place of work and whom may be affected by the employee's acts or omissions at work.

4.2.8.1.2. An employee must, while at work, co-operate with his or her employer or other person as far as is necessary to enable compliance with any requirement under this Act or the regulations that is imposed in the interests of health, safety and welfare on the employer or any other person.

Employee not to interfere with or misuse things provided for health, safety and welfare.

An employee must not, intentionally or recklessly, interfere with or misuse anything provided in the interest of health, safety and welfare under occupational health & safety legislation.

4.2.8.2 Employees Responsibilities

- Read, understand and comply with HES policies, procedures, rules and guidelines
- Do not place at risk their own health and safety, or that of any other person in the workplace
- Promptly report workplace hazards to their leaders
- Report and record workplace incidents and injuries
- Cooperate with leaders when consulted on HES issues
- Participate in reviewing successful outcomes to HES initiatives
- Undertake training as required in safe work practices and safe use of facilities and equipment
- Participate fully in rehabilitation programs

4.3 HAZARD ASSESSMENT, ANALYSIS AND CONTROL

4.3.1 Hazard and risk management plan is clearly discussed and elaborated in ELITE standard HES – 014 but for the purpose of this manual the four stages hazard management process is described below:

4.3.1.1 Stage 1: Hazard Identification

There are a number of quite simple methods used to identify workplace hazards. For example:

- Workplace inspections, using a formal checklist or spot checks
- Referring to information recorded in incident/injury report of previous occurrences
- Communication with employees and through HES consultation
- Observing work areas, work tasks, work processes or work methods

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- Sharing information with other internal workgroups
- Information supplied by the Safety Department Head or General Manager Operations, Work Cover
- Authority or other safety organisations

An analysis of the HES performance of the workplace can be undertaken to identify injury trends and causes of injury. The information gained can be used to develop workplace hazard management programs aimed at eliminating those causes. The Safety Department Head can provide an HES performance analysis.

4.3.1.2 Stage 2: Risk Assessment

When a workplace hazard is identified there is a need to assess its risk of causing injury or damage. Risk assessment is simply a further analysis of the hazard by breaking it down into more specific component parts to evaluate the nature of the hazard. Assessing the risk associated with the hazard by specifically defining its nature will assist in determining its:

- Probability or likelihood of causing injury or damage
- Exposure levels of employee/s i.e. number of employees exposed, time exposed, frequency of exposure
- Consequence/s or severity of outcome

4.3.1.3 Stage 3: Risk Control

The rated value of the risk (high, medium or low) will determine the most suitable and practicable method of risk control. The most suitable method of risk control must be selected in relation to the work environment following the hierarchy of control process described below.

4.3.1.3.1 Elimination/Substitution

Is there a need to use the equipment, process, substance that created the risk?
Is there an equally good and safer item of equipment, process or substance available that will remove the risk? If there is then use it!

4.3.1.3.2 Engineering Controls/Isolation

Can the risk be removed or reduced by isolating, enclosing or redesigning the equipment, process or substance? E.g. safety devices, mechanical lifting aids, automatic doors, trolleys, workstations.

4.3.1.3.3 Administrative Controls

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Examples are: task variation, limit number of people exposed to risk, job training and storage arrangements for heavy and frequently used items.

4.3.1.3.4 Personal Protective Equipment (PPE)

The least desirable method which should only be used in combination with other controls or if other controls are not suitable. Employees issued with PPE should have it fitted correctly and be trained in its use and maintenance. Please see HES – 002

Note: Other than elimination/substitution, a risk may not be appropriately managed by only one of the risk control options. Consideration should be given to the appropriate combination of measures which will most effectively manage the risk.

4.3.1.4 Stage 4: Monitor and Review

The method of risk control selected and implemented will need to be subject to periodical monitoring and review to ensure that its effectiveness for control is maintained. Managers/team leaders will ensure controls are suitable and make recommendations to the Safety Department Head or General Manager Operations for improvements to the control method, if necessary.

4.3.2 Identified Hazards

Below are the primary identified hazards the employee may encounter while working in ELITE Construcciones;

- 4.3.2.1 Workspace - Ensure that sufficient space is provided for safe work. Floors & surfaces must minimize slips & trips, and people must be able to move safely around the workplace.
- 4.3.2.2 Hazardous Chemical – Please see ELITE procedure HES – 004
- 4.3.2.3 Confined Space Entry – Please see ELITE procedure HES – 005
- 4.3.2.4 Vehicle Incident/Accident – Please see HES – 006 procedure.
- 4.3.2.5 Excavation and Trenching – Please see HES – 008 procedure
- 4.3.2.6 Scaffolding – Please see ELITE procedure HES – 009
- 4.3.2.7 Asbestos Exposure – Please see ELITE procedure HES – 018
- 4.3.2.8 Hazardous Energy – Please see ELITE procedure HES – 019
- 4.3.2.9 Crane Operation – Please see ELITE procedure HES – 021
- 4.3.2.10 Falling – Please see HES 022 procedure

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4.3.2.11 Excessive Noise – Please see HES – 025 procedures

4.3.2.12 Fire and Explosion – Please see HES - 023

5. TRAINING PROGRAM

5.1 Health and Safety Orientation

This program ensures that new employees, visitors and contractors to get familiar with ELITE workplaces health and safety program and helps reduce risk of potential injuries and accidents. Similarly, this program will also discuss Drug and Alcohol Policy, Security Procedure, Vehicle Safety Procedure, Incident Investigation and Reporting, and, Industrial Hygiene Program, Emergency Notification Plan, Malaria Control Program and Environmental & Construction Waste Management System.

This Health and safety orientation program is applied to ALL new ELITE employee and ELITE employees who are returning from their vacation. This health and safety orientation training program is conducted annually.

5.2 Safe Work Practices and Safe Work Procedure Training Program

ALL ELITE employees shall undergo training of the safe work procedure established by ELITE Construcciones SL stated below:

- 5.2.1 Personal Protective Equipment (HES – 002)
- 5.2.2 Hazard Communication (HES – 004)
- 5.2.3 Confined Space Entry (HES – 005)
- 5.2.4 Excavation and Trenching (HES – 008)
- 5.2.5 Scaffolding Safety Procedure (HES – 009)
- 5.2.6 Job Safety Analysis (HES – 010)
- 5.2.7 Asbestos Exposure Control Awareness (HES – 018)
- 5.2.8 Control of Hazardous Energy (HES – 019)
- 5.2.9 Mobile Crane Operation Safety Procedure (HES – 021)
- 5.2.10 Fall Protection (HES – 022)
- 5.2.11 Incipient Fire Training (HES – 023)
- 5.2.12 Forklift Operation (HES – 024)
- 5.2.13 Safe Work Permit System (HES – 026)

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5.2.14 Respiratory Protection Awareness (HES – 027)


5.2.15 Hydrogen Sulfide (H₂S) Safety Program (HES – 028)

5.2.16 Manual Handling Safety Procedure (HES – 029)

6. REVIEW AND EVALUATION

ELITE Construcciones SL HES policy and program manual review and evaluation are necessary to determine whether HES policy and program has been properly implemented and maintained. This evaluation will also help improve the HES policy and program thru identification of gaps and evaluation of incident reports, HES observation reports, regulatory updates and cooperation of company personnel and management.

HES Policy and Program review and evaluation shall be conducted every three (3) years.

	HES OBJECTIVES & TARGETS	HES 01- D
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HSE OBJECTIVES

- Protect employees from risk of injuries and health hazards by setting key performance indicators, leading and lagging indicators
- Reduce environmental impacts and improve performance regularly

Leading Indicators (Proactive KPIs)



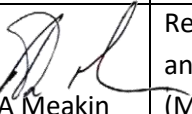
Objectives		Annual Target
A	Health	
1	Provision of Malaria Prophylaxis Medicine	100%
2	Pre-employment Medical Exam	100%
B	Safety	
3	HES Induction	100%
4	Nearmiss Reporting and Investigation	100%
5	Fire Extinguisher Inspection	12
6	First Aid Inspection	4
7	Heavy Equipment Inspection Verification	12
8	Eye wash Inspection	4
9	Noise Monitoring	2
10	Third Party Lifting Equipment Inspection	1
11	Third Party Inspection of Lifting Gears	2
C	Environment	
11	Spill Kit Inspection	1

Lagging Indicators (Reactive KPIs)

Objectives		Annual Target
A	Health	
	MI (Malaria Incidents)	≤ 30 cases
B	Safety	
	Fatality	0
	LTIR (Lost Time Injury Rate)	≤ 0.1
	Restricted Work Case	≤ 4
	Medical Treatment Case	≤ 6
	VI (Vehicle Incidents)	≤ 12
	First Aid Case	≤ 5
	NMI (Near Miss Incidents)	≤ 10
	FI (Fire Incidents)	≤ 1
C	Environment	
	OS (Oil Spill)	0

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1. Approval and Revision Record

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i>	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	01 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years.
3	30 May 2021	 M Caceres	 K Richardson	 A Meakin	Renamed from HESPP (Policy and Program) to HESMS (Management System)

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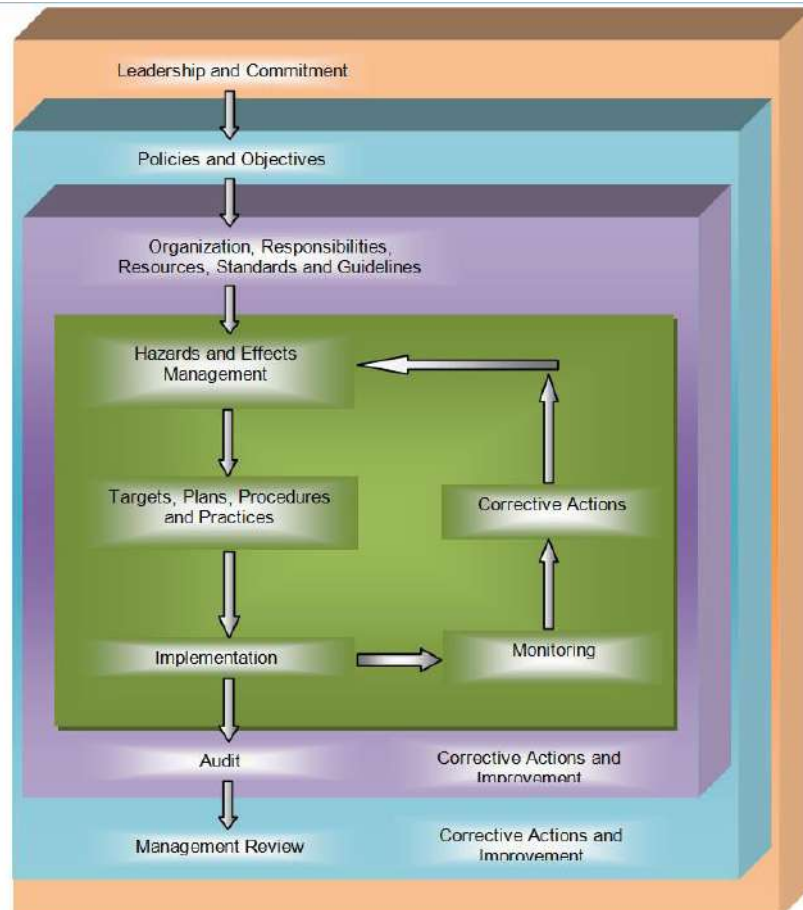
2. Purpose

The purpose of this HSE Management Plan is to:

- Provide guidelines for the provision and management of Manpower Supply at Malabo, Equatorial Guinea;
- Identify potential health, environmental, safety and security issues associated with the management of fully integrated physical plant, facility operations & maintenance services, including but not limited to the maintenance, Contracts, Service Facilities and Vehicle Maintenance;
- Describe the measures that have been – or will be – taken to resolve identified health, environmental, safety and security issues and manage potential risks,
- Describe the allocation of responsibilities at all levels of the services including contractors; and
- Facilitate coordination regarding health, environmental, safety and security issues.
- Continuously improve HSE performance on policies, procedures, implementation and best practice.

3. HSE Management Framework

ELITE CONSTRUCCIONES SL Health, Safety and Environment management system provides the framework for managing all aspects of the development



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Figure 3-1: HSE Management Framework

The management system is a systematic approach, which is designed to:

- ensure compliance of the law
- demonstrate that all hazards are adequately managed
- achieved continuous improvement in HSE performance

This framework facilitates the structured management of HSE hazards and effects associated with the business, and ensure that mitigative methods are in place for properly controlling the hazards.

The management system is structured around the ISO standard framework of:

- PLAN
- DO
- CHECK
- PROVIDE FEEDBACK

4. SCOPE

4.1 This Plan applies to the undertakings associated with the provision of Manpower Supply to manage:

- Civil Works, Mechanical and Electrical Works;
- Maintenance Supply, Engineering Works; and
- Physical plant, facility operations & maintenance services, including but not limited to the maintenance of MEGPL & EG LNG other Clients Facilities and Vehicle Maintenance.

4.2 The application of this safety management plan is the direct responsibility of CLIENT Representatives involved in the services, (HSE Department), ELITE Construcciones Management and all ELITE Construcciones personnel assigned to supervise, oversee and work in the rendering of services. An HSE plan will be developed as the development progresses. The plan will include all activities are within the context of the HSE management system.

4.3 Where Elite Construcciones S. L. HES Management System and the clients Management System differ in certain provisions, the more stringent HES Management shall be used unless otherwise stated in the contract or in a documented agreement.

5. HSE LEADERSHIP AND COMMITMENT

ELITE Construcciones has the responsibility to ensure high safety performance, to protect the health and safety of persons and environment, to not damage equipment or other facilities, to work in compliance with Client HES requirements.

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ELITE Construcciones overall target is “ZERO accident, No harm to people, and No damage to property and the environment.”

ELITE Construcciones believes that strong and visible management leadership is critical for promoting a culture conducive to reducing risk. ELITE Construcciones SL requires that senior management provide a leading role towards constant HSE improvement through:

- visible leadership
- communicating the importance of HSE considerations in all business decisions
- communications with stakeholders

ELITE Construcciones is expected to foster the active involvement of employees and contractors in improving HSE performance by encouraging a positive HSE culture through the following key beliefs in safety:

- The health and safety of people has first priority in achieving ELITE Construcciones excellence goals.
- All injuries and occupational illnesses can be prevented.
- Top management must be committed to safety excellence through visible personal involvement.
- Safety is an integral part of every job and every employee has a responsibility for safety.

A solidly implemented HSE management system is an essential foundation for HSE performance. Continuous improvement will only be achieved when management fosters a culture in which business is conducted safely.

6. POLICIES AND OBJECTIVES

The daily objectives and targets on the contract are established by the ELITE Construcciones Contracts Administrator and the ELITE Construcciones Safety Representative, reflecting HSE accomplishment and any other work anticipated for that day. The top priority of the HSE targets is having “ZERO” accident, No harm to people, and No damage to the property and environment for the entire construction period.

6.1 Policies

Management uses policies to communicate its intention and expectations to employees, contractors and stakeholders. Policies and commitments to the policies are mandatory for all ELITE Construcciones business. Following are the policies that will be used:

- Business Principles and Code of Ethics
- Commitment to Sustainable Development and HSE Policy
- Drug and Alcohol Policy
- Respectful Workplace Policy

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6.2 Objectives

Elite Construcciones establishes and maintains documents HSE objectives to reflect the company's short and long-term aspirations. These objectives provide direction for setting targets and are articulated each year in the annual sustainable development report. HSE objectives that will be used for the Elite Construcciones SL included:

- protecting soil and groundwater through programs to reduce the potential for spills or leaks
- demonstrating the capability of responding effectively to all emergencies
- avoiding adverse HSE impact on communities through careful management

7. ROLES AND RESPONSIBILITIES

7.1 ELITE Construcciones Company and Clients are both responsible and accountable for protecting all personnel involved in the project, the environment and all assets utilized.

- Tony Meakin (ELITE Construcciones General Manager) - 222 259622
- Kevin Richardson (ELITE Construcciones Operations Manager) - 222 245472
- Sam Carangalan (ELITE Construcciones HSE Department Head) - 222 022071

7.2 ELITE Construcciones Company is responsible in assuring quality of the company's HSE Management Plan, supply and assigned appropriate and competent personnel to the Contract Services, and assured adequate resources and time in the schedule to manage the contract in accordance with the agreed Implementation and Execution Plan. The ELITE Construcciones General Manager and the ELITE Construcciones Contracts Administrator are also responsible in providing resources to implement remedial actions following audits in an expeditious manner.

7.3 Client HSE Manager is responsible for advising Company and Contracts Services Management Team of any HSE-related issues associated with the services which require action. Primary HSE support for the project will be provided by Client Equatorial Guinea HSE professionals. Ensure all aspects of the company Safety Program have been implemented as required.

7.4 ELITE Construcciones Supervisory Personnel is responsible in ensuring that the work under his/her supervision is carried out effectively and safely, in an environmentally sound manner, and meets schedule and quality requirements. He/she is also accountable for the actions of his/her subordinates and will always reinforce safe work behaviours.

7.5 Employees and Workers - are responsible to be aware that safety is everyone's responsibility. It is also their responsibility to strictly follow instructions and directions

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given by the Contract Services Management Team, ELITE Construcciones Contracts Administrator, Supervisors, Lead man and HSE Personnel. Everyone have the authority and are responsible for stopping unsafe acts, conditions change, alerting their direct Supervisor of unsafe work areas, participating in Clients HSE Induction Training Course prior to starting their field of work, and any specific training course according to the requirements.

7.6 Contractor / Subcontractor - All contractors/subcontractors shall be made aware of company Health, Safety and Environment Program rules and regulation. The Contractor Supervisor and/or Foreman shall be responsible for the direct supervision and safety of their crew. They are accountable to the Project Superintendent for the Performance of personnel through the work safe practices and procedures as well as any other Acts and Regulations. It is the contractor/subcontractor responsibility to perform the job in compliance with our safety standards or other applicable legislation.

Any infractions not immediately corrected as directed by Elite Construcciones SL will result in the contractor/subcontractor being advised of the breach of contract and the action that will be taken as a result of the breach according to company policy. It must be firmly established that our safety program protects all workers on the job, including contractor's / subcontractor's employees.

7.7 Visitors Responsibilities – Each visitor is responsible for safeguarding /his/her own health and safety. All visitor must:

- Report to the project office and obtain permission for entry onto the project site.
- Wear approved personal equipment.
- Report any unsafe acts or conditions to the Project Superintendent.
- Report any injuries sustained on the site to the Project Superintendent.

8. CONTRACTOR MANAGEMENT

8.1 One key to ELITE Construcciones success in HSE management is the performance of contractors, suppliers and other who work on the development and support the operations. ELITE Construcciones checked and review contractor HSE management system to ensure a high quality of HSE qualification, selection and management. The key steps of the process are:

- Pre – Qualification / selection
- Pre-job activities
- Work management
- Post job evaluation
- System review

8.1.1 Pre – Qualification / Selection process

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Part of the pre - qualification step ELITE Construcciones SL utilizes criteria to select the most qualified vendor and contracting firms based on demonstrated competence and qualification. Elite Construcciones SL may include other criteria such as:

- Experience in the past performance of the firm
- Experience and past performance of assigned individuals
- Capacity to perform work
- Financial Strength and bonding capability
- Management plan, subcontractor relationships and technical capabilities
- **Safety Plan and record**
- Quality assurance plan

Physical or written evidence should be forwarded to ELITE Construcciones to verify the correctness of all documents submitted.

8.1.2 Pre – job activities

Successful contractor will not commence any work without conducting a “Kick-off Meeting”. Safety Orientation, Risk Assessment and the expectation of the management should be clearly discussed and defined on this meeting to all employees including contractor and sub-contractors.

9. COMPLIANCE WITH HSE RULES AND REGULATIONS

All ELITE Construcciones employees shall comply with all the applicable Company, Clients, local, national and international Safety Standards, Rules and Regulation.

ELITE Construcciones General Manager and/or his designee have the right to remove any employee from the “Location” when they seriously or repeatedly violate the rules and regulations.

10. TRAINING PROCEDURE

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10.1 It is a requirement for all ELITE Construcciones employees to comply and attend to all training requirements of the Company & Clients and completes Safety Induction briefing on facilities specific to their job specifications prior to starting work in any field performance.

10.2 Contracts Services Management Team and Clients EHS Representative are responsible for ensuring that all ELITE Construcciones personnel attend and complete required safety trainings and briefings to commencing field works on site.

10.3 TRAINING SYSTEM

10.3.1 ALL EMPLOYEES and contractors’ employee(s) working under ELITE Construcciones SL, must undergo basic orientation and general orientation with examination at the end of the course to ensure that employees understand thoroughly the company policy, standard and procedure. Employee(s) who will not pass the examination will be given a second chance, in the event that employee(s) still could not pass the second examination. Employee(s) will not be allowed to work in any company premises, in adherence to company policy of keeping everybody safe. The employee(s) will be allowed to take again another orientation and examination until 6 months off period.

10.3.2 Employee(s) who are working with the Oil & Gas industry (O&G), shall undergo a PSM Process Hazard Overview course with examination. Core training course is also mandatory for the employee(s) working with the Oil & Gas industry clients. Core Training have eight(subjects) which are Safe work permitting, Hot & Electrical Safety, Confined Spaces Entry, Job Safety Analysis, Lockout/Tagout (LOTO), Fall Protection/Working at Heights, Lifting Standard and Excavation. Employee(s) must pass the PSM Hazard overview and core training course for employee(s) to be allowed to work with the Oil & Gas Industry. Employee(s) who will not pass the PSM Process Hazard Overview and core training will be given a second chance, in the event that employee(s) could not pass the second examination. He is not allowed to work in any Oil & Gas Industry client. The employee(s) will be allowed to take again the said course and examination until 6 months off period.

10.3.3 Supplementary safety trainings are given to employee(s) as the work requires.

10.3.4 Skill development program is developed to keep ELITE Construcciones skilled employee(s) competent to the job/work they are performing. Elite Construcciones SL contract recognized and reputable external parties to enhance, upgrade and evaluate the skills of the employee(s).

10.4 TRAINING RECORDS

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Safety Management is generally responsible to keep records accurately, well organised, and up to date for all safety trainings. All safety records must be accessible to all concerned parties until the time of their destruction. Disposal of inactive records are permitted only with the written disposal authority notified by the Safety Department head and approved by the General Manager.

11. HSE COMMUNICATION

11.1 Tool Box Meetings

A Tool Box Meeting is one of the most effective means of eliminating accidents/incidents and enhancing the safety awareness of all personnel. It is held prior to starting the work or a specific task or at a specified interval. The ELITE Construcciones Contracts Administrator or his/her designee takes the initiative of conducting the Tool Box Meeting and all the work crew including Clients Representatives shall actively participate.

11.2 Physical Source of Communication

- Bulletin Boards
- Warning signs (i.e. road signs, smoking areas, etc.)

11.3 The working plan and procedures for the day are explained, discussed and confirmed including the following:

- Discussing applicable JSA prior to commencing work (if an activity needs one),
- Anticipation of potential hazards and suitable countermeasures (including fire prevention),
- Inspection of equipment, tools and facilities,
- Confirmation that any Safe Work Permits (if needed) required for the work have been obtained,
- Use of proper personal protective equipment and safety devices,
- Information on other work to be conducted in the same location or area, and
- Visual inspection of the health and condition and proper allocation of workers according to the requirements.

12. OPERATIONAL CONTROLS

12.1 HSE Practices and Procedures

The activities and services will be conducted in accordance with Clients established HSE procedures.

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12.2 Work Practices

Horseplay is not tolerated. Smoking is allowed in designated areas only.

ELITE Construcciones personnel are not allowed to report to work under the influence of any drugs, alcohol or other intoxicating substances, or carry weapons or firearms while at work site or at any Group site.

All safety equipment, safety showers, eye wash fountains, fire extinguishers, emergency exits, and walkways must be kept clear at all times.

All work areas shall be kept clean and free of debris and rubbish in order to prevent accidents and fires.

Tools and equipment shall be kept in such a location that they do not represent a tripping hazard and cannot fall or be knocked from structures.

All equipment shall be kept in good working conditions at all times and shall be repaired or replaced when defective.

ELITE Construcciones personnel will not enter other installations or locations aside from their designated work areas unless written consent from Clients has been obtained.

All materials and substances used in the provision of services will always be labelled and information on the characteristics and toxicity of such materials (such as MSDS) will be made available at the work site and communicated to those persons who may come in contact with such materials and substances.

Hearing protection shall be used in designated areas or where noise levels exceed 85 dBA.

12.3 Safe Work Permits

All activities and services requiring work permit will be conducted under Clients established Safe Work Permit System. Copies of the approved Safe Work Permits will be maintained at designated locations or site and at the Clients permit board.

12.4 Personal Protective Equipment

ELITE Construcciones will provide its employees with necessary and well-maintained or new PPE free of charge. All employees, when applicable, shall wear safety hard hats, safety glasses with side shields, appropriate protective clothing and steel toed shoes. All ELITE Construcciones employees on the "Location" shall properly wear additional PPE according to job requirements as stated in the Safe Work Permit and/or Safety Procedures for specific work activities.

When preparing PPE requirements, Clients Personal Protective Equipment Procedure shall be used for reference.

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12.5 Short Service Employee (SSE)

ELITE Construcciones SL recognise that new employees or experienced employees new to the company or new in their position requires more assistance concerning to safety matters.

To ensure their occupancy health and safety, Safety management developed the following system:

- Identify physically the new employees or experienced employees new to the company or new in their position by wearing different colour hard hat not identical to old employees.
- Probationary of 2 months period shall be given to new employees or experienced employees new to the company or new in their position to observed and absorbed company safety culture.
- HSE Training department to give evaluation to new employees or experienced employees new to the company or new in their position at the end of their probationary period.

12.6 Equipment Inspection

ELITE Construcciones Contracts Administrator is responsible for ensuring that all heavy equipment are inspected and tested by a third party prior to mobilisation on site.

13. RISK ASSESSMENT AND WORK EXECUTION

13.1 The identification and analysis of loss potential (Risk Assessment) and the establishment of measures to prevent accidents/incidents and/or property damage are essential for executing the work properly and safely. Competent personnel shall systematically analyse all work activities to identify serious loss potential anticipated during the execution of works and services.

13.2 The work analysis and identification of hazards will be used to support the development of effective and safe work execution methods, and should include to:

- Examine how the work is to be performed and write down the work steps and procedures,
- Identify potential risks for each work step,
- Analyse and evaluate risks according to severity and probability, and evaluate whether risk control or risk education measures are required,

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- Examine and establish risk control or risk reduction measures (Elimination of hazards or reduction of risk)

The risk control or reduction measures shall be practicable to execute.

13.3 The Risk Assessment for the Contracts Services should be jointly identified and analysed by representatives from ELITE Construcciones Management, Contractor's Representatives and HSE Representative. The Risk Assessment should be conducted in accordance with the JSA Program to identify the tasks required to complete an activity, assess the hazards associated with each task, and implement controls or actions to eliminate or minimize the identified risks.

13.4 Works that require a JSA shall not be conducted without an approved Job Safety Analysis. A JSA is an effective tool for analysing a job, identifying the potential hazards and implementing necessary controls to perform the job safely.

13.5 When performing a JSA, the ELITE Construcciones Contracts Administrator should:

- Ensure all persons are trained and competent in the work they conduct,
- Define the task or scope of work,
- Clearly define individual sequential step to be done,
- List the workers and equipment to be used in the job,
- Identify and list potential hazards and employees' exposure for each step, and
- Specify recommended actions to safely perform the job

13.6 ELITE Construcciones Contracts Administrator is responsible for ensuring that all workers are familiar with applicable JSA prior to commencing work, for works requiring JSA.

14. EMERGENCY PREPAREDNESS / RESPONSE PLAN

14.1 The ELITE Construcciones SL Emergency Management Plan is the framework for emergency response and preparedness on ELITE Construcciones company facilities and work areas. The primary design of the plan is to protect life of the employees or workers, secondly to minimize impact to environment or property damage.

14.2 Emergency management scope

The *Emergency Management Plan* applies to all emergencies that could impact the ELITE Construcciones SL, including any incident that may occur exclusively within facilities work places and/or property.

14.3 Emergency Contact Information

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Whoever discovers an emergency shall immediately inform the ELITE Construcciones Contracts Administrator or his/her designated personnel through a given mobile phone number below:

- Tony Meakin (ELITE Construcciones General Manager) - 222 259622
- Kevin Richardson (ELITE Construcciones Operations Manager) - 222 245472
- Sam Carangalan (ELITE Construcciones HSE Department Head) - 222 022071

For all work related medical issues, ELITE CONSTRUCCIONES Contracts Administrator or designated personnel at the “Location” shall be contacted, who in turn will be responsible to contact the Clients Medical Clinic and the Clients EHS Manager or the designated EHS Representative, through a given mobile phone number or Radio Channel by the Client.

14.4 Emergency Preparedness / Response Procedures

Emergency response procedures will be reviewed during safety stand-down prior to the start of the Contracts Services.

14.4.1 Emergency Planning/Preparedness

Emergency planning is a critical component of the ELITE Construcciones Emergency Response efforts. Emergency preparedness requires close coordination and collaboration of all departmental units to achieve an effective overall response. The entire management, from the General Manager through the entire organizational structure, including the workers and visitors, may potentially be impacted by an emergency and therefore should continually assess their ability to effectively respond in such a way as to minimize if not eliminate loss of life, serious injury, environmental impact and property damage. Department personnel should be familiar with their respective areas of responsibility and develop plans to not only provide for personal safety, but achieve operational objectives that will serve to fulfill these emergency responsibilities.

In order to prepare for emergencies that the management has the potential to encounter, ELITE Construcciones SL has conducted a Hazard Assessment in every work places identifying and rating the different type of hazards that should be considered through emergency planning. To maintain a state of readiness and test critical response components, monthly fire drill will be conducted and quarterly Cardiopulmonary Resuscitation (CPR) training. This drills provided opportunity to ensure that adequate preparations are in place to effectively respond emergencies on company facilities or work areas and response team personnel are ready to perform their assigned duties.

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ELITE Construcciones Contracts Administrator shall ensure that all ELITE Construcciones personnel have attended and completed the relevant Location Emergency Safety Training.

14.4.2 Emergency Response Procedure

14.4.2.1 Emergency Response Team

HSE Department Head is the principal group responsible for the development of ELITE Construcciones Emergency management plan. Specifically, HSE will be responsible for:

- Overseeing the Emergency Management Plan and its continued development
- Reviewing Emergency plans as submitted by departments and divisions, ensuring they complement other plans and fit into the framework of the Emergency Management Plan
- Scheduling and developing table top exercises and drills
- Initiating budgetary requests necessary to fund initiatives related to EMP preparations
- Providing staff to serve as the Emergency Management Team

Medical staff responds the emergency calls to provide immediate care to critically ill and injured, and to transport the patient/victim to a medical facility.

Trained Incipient Fire Fighter to respond alarms, inform and call proper authority in the event of emergency or fire. Management have a mutual aid agreement with MEGPL in the event advance stage of fire in the company facility and/or work places. Fire extinguishers are visibly available in every fire hazard areas.

14.4.2.2 Communication

Whoever discovers an emergency shall immediately inform and notify ELITE Construcciones Supervisors or his/her designated personnel. Use mobile phone if allowed or radio transmission if working inside the process area as way of communication.

ALL employee/worker shall report calmly to the assigned “Muster Point Station” of the client or if working in ELITE facilities report in front of the main gate as designated “Muster Point Station”.

14.4.2.3 Accounting of Personnel

Personnel on “Location” will be accounted through the daily attendance sheet maintained by the ELITE Construcciones Contracts

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Administrator. Further accounting of personnel can be done through the Clients Badging scan system and Personnel Registers.

14.5 Evacuation

All ELITE Construcciones personnel on “Location” should familiarize their assignments in an emergency and participate in all drills conducted at Clients Facilities.

15. HSE PERFORMANCE MEASUREMENT

15.1 The Contracts Services Management Team is responsible in monitoring and measuring HSE performance through periodic HSE inspections of work activities to provide relevant information for further improvement on specific HSE issues.

15.2 ELITE HSE Management Plan implementation will be reported weekly to evaluate the status of achievement towards set objectives and targets, as well as compliance with HSE policies/procedures including applicable JSA and Safe Work Permit conditions. An annual review and report on Health, Safety and Environment to be conducted by the management team to assess HSE performance against target and objectives.

15.3 Clients and ELITE Construcciones Company will agree on a Performance Based Compensation package to outline specific Key Performance Metrics (KPM). Clients will conduct evaluation of ELITE Construcciones performance on a quarterly basis.

15.4 Clients and ELITE Construcciones HSE Representatives will attend toolbox talks, review work activities, and audit permits/JSAs as appropriate. The purpose of these activities is two-fold – (1) to alert and provide advice/guidance to Contracts Services Management Team/Representatives regarding potential HES issues and (2) to ensure the effective HSE leadership by Contracts Services Management Team/Representatives.

15.5 KEY PERFORMANCE INDICATOR

This procedure help ELITE Construcciones SL understand how well is the company safety performance in relation to company strategic goals and objectives. This procedure also provides the most important safety performance information that enables ELITE Construcciones SL to understand whether the organisation is on track or not. The three (3) main reasons for measuring performance are:

- Learn and improve safety performance
- Report externally and demonstrate compliance to safety standards and regulation
- control and monitor people

15.5.1 Measuring to Learn and Improve Performance

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The aim is to equip ELITE Construcciones SL employees with the information they need to make better informed decisions that lead to improvements. ELITE Construcciones SL used Lost Time Incident (LTI), Vehicle Incident (VI), and OSHA recordable injury as key indicators of company safety performance.

15.5.2 Measuring to Report externally and Demonstrate Compliance

Purpose of this is to comply with external reporting regulations and information requests. Any reports and associated indicators either have to be produced on a compulsory basis such as annual performance reports for regulators; or can be on a voluntary basis such as environmental impact reports.

15.5.3 Measuring to control and monitor people

Performance indicator used in a top-down command and control trends to guide and control people's behaviours and actions. These measures are used to set goals or rules, to objectively assess the achievement of these goals, and to provide feedback on any unwanted variance between achievements and goals. Here, the aim of measurement is to eliminate variance and improve conformity. In this context, measures are often tightly linked to reward and recognition structures.

16. HSE ANNUAL IMPROVEMENT PLAN

16.1 This "HSE Annual Improvement Plan" is aimed at engaging and sustaining of management support of:

- effective communication of established core safety values, principles, and expectations;
- safety awareness and improvement opportunities for Elite Construcciones workers and staff; and
- expected outcomes for HSE improvement plan

16.1.1 Effective Communication of Established Core Safety Values, Principles and Expectations

ELITE Construcciones SL embraces the philosophy that all accidents are preventable and has consistently communicated this philosophy to EC SL General Manager, key personnel and Staff. The following actions are being, or will be, implemented. These actions are directed at communicating consistent safety values, principles, and expectations.

- Establish "Safety Leadership" as a core performance expectation for all ELITE Construcciones SL managers and key personnel.
- Improve the effectiveness of "management observation" activities performed by Directorate and Division level managers.

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- Improve the effectiveness of the ELITE Construcciones SL management assessment process.
- Continue to implement behaviour-based programs, such as the Field Observation and Reporting Card® (FORC), where appropriate (e.g., key personnel, supervisors, etc.).
- Incorporate “human performance” improvement concepts into EC SL work process.
- Develop and deploy safety culture surveys.

16.1.2 Increase Safety Awareness and Provide Safety Improvement Opportunities

Safety awareness and training are crucial to enhance the receptiveness of ELITE Construcciones SL staff to behaviour changes and their understanding of management’s increased expectations in safety performance. The following actions will be implemented to improve safety training and awareness for managers, supervisors, and staff.

- Incorporate safety leadership principles and the belief that “all accidents are preventable” into Group Leader training.
- Incorporate safety leadership principles and “human performance” concepts into LSM training.
- Provide training on “human performance” principles to ELITE Construcciones SL staff, varying the levels of detail as appropriate for various staff positions.
- Provide support to the “Distinguished Lecture Series” coordinator in finding speakers to reinforce behavior-based safety and “human performance” principles.
- Develop a comprehensive communication plan, which includes communication avenues.

16.1.3 Expected Outcomes

The actions and activities identified in this “*Safety Leadership Improvement Plan*” will assist ELITE Construcciones SL management and staff in achieving a strong safety culture and world leadership in safety performance. While traditional performance indicators may show rapid improvement, a true culture change takes time (e.g., embracing the belief that all accidents are preventable). ELITE Construcciones SL expects the following long-term outcomes through continued management leadership and successful implementation of the “*Safety Leadership Improvement Plan*.”

- **Continued reductions in the number and severity of injuries.** We expect performance to vary from month to month, understand that variations will occur, and realize that it is the sustained reduction of both severity and number incidents over time that is important. However we will continue to address safety and place a high priority on improved safety performance.

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- **Continued improvement in the ratio of issues identified through observations and assessments versus those identified via event self-disclosure.** At some point in a very mature organization, the overall numbers of issues that trigger reporting requirements should decline. This is not a near-term objective at ELITE Construcciones SL while we are strongly encouraging self-disclosure of issues and challenges relating to safety.
- **Improved indicators from employee safety culture surveys.** We plan to document the baseline survey results and track future survey results to identify trends, as well as improvement issues so that we can realign our planned actions to provide continuous improvement in ELITE Construcciones SL's safety culture.
- **Continued Reduction of volume for Solid & Liquid waste.** Minimizing and reducing solid and liquid waste every year and reduction of oil spill incident.
- **A reduction in errors and mistakes and their impact that result in injuries and occurrences.** These expectations will be considered in the development of the performance indicators that will be used to monitor our overall progress.

16.2 Departmental Objectives Improvement

16.2.1 Administrative and Human Resource Department objectives are to:

- Continue review and develop administrative policy and procedure to comply and conform new best practices in the industry.
- offer the best services to client and employee
- ensure that only fit, competent and qualified individuals are recruited and hired.

16.2.2 HSE Department objectives are to:

- reduce the number and severity of the injuries
- review and developed HSE standards and procedure and conduct more training programs to improve management safety cultures
- Response Business plans and safety needs
- make safety knowledge, information, and tools prominent and easy to access use features at ELITE Construcciones SL.

16.2.3 Construction & Operation Department objectives are to:

- accomplish projects timely, safely and within the allocated fund thru acceptable quality
- provide services that will satisfy the needs and expectation of the client

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- ensure that employee understand and comply safety standards of the company and the client.

16.3 Improved Methods of Safety Communication

Objective is improving safety communication from the Safety Team to ELITE workers and contractor and back again. In fulfilment of this objective, management developed methods in improving safety communication as follows:

16.3.1 Safety Meetings / In service Training Programs

These Meetings should be held on a regular periodic basis for company employee and/or contractor. If adverse accident trends develop, however, schedules should be changed so meetings can take place as possible to address these issues. Training of all company employees and contractor in regard to safety is paramount to the success of company Safety target and objectives.

16.3.2 Written Communication

Written safety communication should be reviewed periodically. It should be distributed regularly to all employees, pointing out achievements of company safety program, current accident frequency or severity trends, safety tips, and so forth.

16.3.3 Bulletin Boards

Safety Bulletin Boards should be maintained throughout the company's facilities and work areas. The boards should be used exclusively for safety materials and placed in areas frequented by employees, contractors and visitors. Materials posted should be updated or changed pursuant to a predetermined schedule.

17. ACCIDENTS, INCIDENTS and NEAR MISSES

- 17.1 Incidents will be reported and investigated regardless of severity in accordance with ELITE Construcciones HSE007 Incident Investigation and Reporting procedure and the ELITE Construcciones Safety Documentation No. 007 form "Incident Investigation Report Form" and will be accounted for in ELITE Construcciones incident/accident statistics.
- 17.2 Results of each incident investigation, especially the outline, basic and direct causes of the accident and the measures taken to prevent reoccurrence of similar accidents will be appropriately disseminated in Safety meetings, Tool Box Meeting or via other communication tools within the Clients and ELITE Construcciones HSE Program.

18. ACTION PLAN

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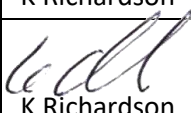
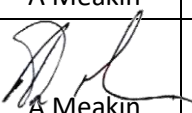
No.	Outstanding Action	Responsibility	Complete By
1	Provide accident/incident rates	ELITE Construcciones	Before commencement of work activities.
2	Provide safety training information	ELITE Construcciones	Before commencement of work activities.
3	Provide information on safety programs	ELITE Construcciones	Before commencement of work activities.
4	Provide other HSE information	ELITE Construcciones	Before commencement of work activities.

19. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.


	HSE ORIENTATION	HES 01- C
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	01 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years.
3	30 Dec 2022	 M Caceres	 K Richardson	 A Meakin	Complete revision of the Orientation policy

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	HSE ORIENTATION	HES 01- C
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE OF THE HSE ORIENTATION POLICY & PROCEDURES

The purpose of this Health and Safety Orientation is to ensure that new employees, visitors and contractors to get familiar with to ELITE workplaces health and safety program and helps reduce risk of potential injuries and accidents. The purpose of this orientation also is to identify hazard a worker, visitor, or contractor may be exposed at the workplace.

3. SCOPE

This Health and Safety Orientation policy applies to:

- New Hires
- Temporary employees
- Fulltime employees returning from leave of absence
- Outside Contractors, and;
- Visitors to the workplace.

4. RESPONSIBILITIES AND ACCOUNTABILITY FOR SAFETY

4.1. EMPLOYEE

All employees shall comply, cooperate and successfully pass the assessment given on this orientation. This basic responsibility includes but is not limited to the following:

- 4.1.1 Use all devices and wear all articles of clothing and personal protective equipment designed and provided for protection, by employer or as required by the safety and health regulations.
- 4.1.2 Know and comply with all safety rules and regulations.
- 4.1.3 Maintain good housekeeping within the area.
- 4.1.4 Promptly report all accidents and injuries and obtain proper medical attention.
- 4.1.5 Report any unsafe work conditions or unsafe practices to the supervisor or any representative of the Safety Department.
- 4.1.6 Know and comply with any specific safe work practices.
- 4.1.7 Cooperate with the Safety Department and Safety Officers.

4.2. DEPARTMENT HEADS, AREA SUPERVISORS, PROJECT SUPERVISORS

The Department Head, Area or Project Supervisor is responsible for promoting safety awareness and demonstrating that safe job performance is of prime importance in the company. This basic responsibility includes, but is not limited to the following:

- 4.2.1 Attend and be familiar with all health and safety training programs required by employees under their supervision.
- 4.2.2 Monitor employee's performance to ensure the skills and knowledge are put into practice and advice HSE Department for modifying training as needed.

	HSE ORIENTATION	HES 01- C
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- 4.2.3 Before the start of each new project, discuss any specific hazardous conditions and advice of any precautions to be taken.
- 4.2.4 Provide personal protective equipment and any other safety equipment required to perform the work safely.
- 4.2.5 Conduct regular inspections, with the safety officer, for unsafe practices and conditions and ensure prompt corrective action is taken to eliminate causes of accidents.
- 4.2.6 Aid in the investigation of accidents, determine the cause and take corrective action where necessary.
- 4.2.7 Enforce all company safety rules and take disciplinary action as necessary to ensure compliance with the rules.
- 4.2.8 Provide a good example for employees by always directing and performing work in a safe manner.
- 4.2.9 Provide safe working conditions for all workers under his supervision.

4.3. SAFETY DEPARTMENT, SAFETY OFFICERS

- 4.3.1 Provide input for the development and updating of both health and safety orientation and job-specific health and safety training programs.
- 4.3.2 Maintain current lists of training records and make it available to anyone who requires information.
- 4.3.3 Review and make recommendations on the health and safety orientation and job-specific health and safety training programs.

4.4. PROJECT MANAGER

- 4.4.1 Ensure that every ELITE CONSTRUCCION SL employee complies with the applicable requirements of this Procedure
- 4.4.2 Provide the resources needed in the implementation of this Procedure

5. COMPONENTS OF THE HEALTH & SAFETY ORIENTATION


5.1. Health and Safety Orientation shall include:

5.1.1 Introduction

- 5.1.1.1 Objectives
- 5.1.1.2 Emergency Evacuation / Response
- 5.1.1.3 Health and Safety Policy
- 5.1.1.4 Management and HES Personnel

5.1.2 Employee Responsibilities and Accountability

- 5.1.2.1 Personal Conduct
- 5.1.2.2 Work Time / Work Schedule
- 5.1.2.3 Housekeeping

	HSE ORIENTATION	HES 01- C
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5.1.2.4 Passport Control (Expatriate Employees)

5.1.3 HES Standards and Procedures for:

- 5.1.3.1 HES 02 PPE Standard
- 5.1.3.2 HES 03 Drug and Alcohol Policy
- 5.1.3.3. HES 04 Hazard Communication
- 5.1.3.4. HES 06 Vehicle Safety
- 5.1.3.5. HES 07 Incident Investigation and Reporting
- 5.1.3.6. HES 13 Waste Management Standard
- 5.1.3.7. HES 26 Safety Work Permit
- 5.1.3.8. Smoking Policy
- 5.1.3.9. Safety and Security Reminders
- 5.1.3.10. Stop Work Authority and Reporting Hazards

5.1.4 Working in Equatorial Guinea

- 5.1.4.1. Biological Hazard Awareness
- 5.1.4.2. Malaria Awareness and Prevention

6. ORIENTATION TECHNIQUE

6.1 Classroom and visual presentation are the method use to share the information.

6.2 Assessment are given at the end of the orientation to ensure that employee fully understand with ELITE workplaces and health & safety programs. No employees are allowed to work in any ELITE facilities or worksite areas without passing the assessment.

6.3 The orientation discussion will be conducted by the HSE Department and discuss the familiarization with ELITE CONSTRUCCION SL company and the work assignments. Discussion should consider the new employees may be facing for the first time the situation of living in a foreign country and coming to terms with a different housing situation and foreign culture.

6.4 English and Spanish Languages are used in visual presentations to ensure that all ELITE employees and contractors (Expats and Nationals) understand this presentation.

7. ORIENTATION VALIDITY AND REFRESHER SCHEDULE

Annual training/refresher will be conducted and evaluated to ensure employees are knowledgeable with regards to ELITE Health and Safety Orientation.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	PERSONAL PROTECTIVE EQUIPMENT STANDARD	HES 002
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

Its purpose is to ensure that all site personnel on the project are provided with appropriate personal protection Equipment, designed to protect themselves from potential hazards that may endanger their health and safety.

When a hazardous situation is recognizes, steps should be taken to eliminate the hazard by engineering controls. Should it prove impractical to eliminate the hazard, then personal protective Equipment must be used that meets the requirements of ANSI or equivalent standards. When it has been decided that personal protective equipment is required, steps must be taken to select the proper.

Type of equipment and ensure that the supervisor instructs his employees in the use and care of that equipment, in accordance with the instructions provided by the manufacturer.

3. SCOPE

This procedure applies to all personnel employed by ELITE CONSTRUCCIONES SL.

1. Face Shield- secondary eye and face protectors utilized in conjunction with primary protectors, i.e. safety glasses, to protect the wearer's face and eyes from flying objects or chemical hazards.
2. Gloves – hand protection designed to protect the hands and forearms from various hazards. The specific hazard anticipated will determine which gloves to utilize.
3. Goggles- protective devices worn over safety to protect against certain hazards i.e., chemical splashes.
4. Hard Hat- headgear also known as a protective helmet. Hard Hats that are rigid headgear of varying material designed to protect the wearer head from falling objects, other impact hazards or electric hazards.
5. Personal Protective Equipment (PPE) - Devices worm by the workers to protect against hazards in the environment. These devices include but are not limited to the following: protective helmets, spectacles, face shields, gloves, and safety shoes.
6. Safety Glasses- a protective eye wear, also known as spectacles, worn to shield the wearer's eyes from the variety of hazards.
7. Safety Shoes- protective footwear designed to protect the foot from the external forces.
8. Welding Helmet- a protective shield from the eyes and face of the wearer to guard against optical radiation and impact. Welding helmet are secondary protection and shall be used only in conjunction with primary protectors by the factors of electrode size, arc current, or plate thickness.

4. ROLES AND RESPONSIBILITIES

MANAGER

	PERSONAL PROTECTIVE EQUIPMENT STANDARD	HES 002
	<i>Document Title</i>	<i>Document No.:</i>

1. The manager is responsible for assuring that all personnel on the project *comply* with these requirements.
2. The Manager is responsible for the compliance with this procedure.

HEALTH, ENVIRONMENT AND SAFETY DREPARTMENT AND HES OFFICER

1. The HES Department shall maintain the written program.
2. The HES Department shall approved the PPE equipment on behalf of Elite Construcciones
3. SL.
4. The HES Department shall periodically perform an assessment of the various project site and work sites owned and maintained by the company.
5. The HES officer shall be responsible in monitoring and strict enforcement for the compliance of this procedure.

SUPERVISOR

1. The Supervisor shall ensure that the proper personal protective equipment (PPE) is used based on the specific hazard of the operation or activity being conducted.
2. The Supervisor shall exercise prudent judgment to determine if additional protective equipment is necessary and ensure that appropriate equipment is worn.
3. The Supervisor shall ensure that PPE is properly maintained or replace as required.

STOREKEEPER

1. The Storekeeper shall ensure that initial and periodic inventory of PPE is accomplished and adequate stock is maintained.

EMPLOYEES

1. Employees shall use the PPE only in accordance with instruction and training received.
2. Employees shall perform tasks requiring the use of PPE only when such equipment is available and in usable condition.
3. Employees shall only use PPE is clean and in good condition.
4. Employees shall report problems with PPE to their supervisor
5. Employees shall only use PPE issued and approved by ELITE CONSTRUCCIONES SL, or as advice by clients, for the specific job. When not in use, store PPE in a clean and sanitary condition.

CONTRACT EMPLOYEES

1. Contract employees, if predetermined in contract term and conditions, shall be permitted to be issued and use PPE by ELITE CONSTRUCCIONES SL, otherwise they must provide their own PPE.

5. POLICY

	PERSONAL PROTECTIVE EQUIPMENT STANDARD	HES 002
	<i>Document Title</i>	<i>Document No.:</i>

GENERAL REQUIREMENTS:

1. The risks in any particular work activity shall be evaluated , assessed and adequate PPE shall be selected in accordance with the following:
 - 1.1. It gives protection against risk / hazard leading to any form of exposure
 - 1.2. Comfort ability and suitability for the user
 - 1.3. Compatibility to the work activity
 - 1.4. Complies with the International Safety m and health Standards designed for the construction
2. All personnel working on project shall be provided *by their respective supervisor* with the necessary PPE for their particular work activity. Necessary training course shall be given to the person on the use and care of PPE.
3. PPE that has been worn to the point that it has reached the end of its useful life, or PPE that is defective or damaged, shall be immediately removed from service and disposed of properly. For example, gloves soaked with grease, oil or other chemicals.
4. All personnel shall be responsible for the proper care and use of any PPE issued and supplied to them. The *company* shall replace, free of charge, any PPE which becomes deficient and defective in any way through normal work usage or wear and tear so that all times the workers have adequate protection. Normal wear and tear shall include the period specified and in accordance with basic hygiene standards. The *company* shall back the charges of the PPE issued in case of negligence and the number of withdrawal had been abused.
5. All Personnel working in the project shall wear the appropriate PPE issued to them at all times while performing at their assigned work tasks.
6. *Supervisor is responsible in ensuring that all personnel on projects are properly using PPE'S required for the work activity*

PPE SELECTION

1. PPE shall be selected and used to provide for all personnel and visitors on the project against:
 - 1.1. Construction HES hazards
 - 1.2. Environmental hazards
 - 1.3. Mechanical and Electrical injury and hazards
 - 1.4. Respiratory and Inhalation hazards
 - 1.5. Skin Contact hazards
 - 1.6. Radiological hazards
2. PPE selection and procurement will be and discussed with the HES Manager in order to reach the safety and health standards, and budgets/ cost effective solution.

Head Protection:

	PERSONAL PROTECTIVE EQUIPMENT STANDARD	HES 002
	<i>Document Title</i>	<i>Document No.:</i>

1. All personnel working on the project are required to properly wear hard hat in all construction areas.
2. Hard hat specifications shall meet and comply in accordance with safety standards.
3. Hard hat are not required in offices except when construction is being perform
4. Hard hat shall not be modified or painted
5. Aluminum hats shall not be worm

Eye Protection:

1. It is mandatory requirement that eye protection is worn within the construction areas. The protection shall conform International Standards and Practices for Occupational Eye and Face protection.
2. 100% eye protection requirements on personnel shall be initiated for works areas where significant eye injuries may occur. Safety signs shall be posted at appropriate locations, informing and requiring wearing eye protection.

Hand Protection:

1. All personnel on the project shall be required to wear hand protection for task which exposes them to recognize potential hand injuries.
2. Hand glove shall not be worn when working near rotating machinery
3. Worn or torn gloves with loose tie string are not be used.

Foot Protection:

1. All personnel on the project shall be required to wear foot protection to protect against impact, chemical electric shock; flammable materials, radiological contamination. Foot protection shall comply with International Safety Standards.
2. Foot protections includes safety steel toe shoes, toe cap and must meet ANSI Z41.1

Respiratory Protection:

1. Where work requires respiratory protection, All employee must have an appropriate respiratory equipment to be used when needed.
2. Definitions and specific details for respiratory equipment are discussed on respiratory protection program (HES- 027).

BASIC PPE REPLACEMENT SCHEDULE

1. Hard Hatevery 2 year or when it is cracked ,dented, or has taken a heavy blow
2. Safety Glasses/Gogglesevery 4 month or when the frame are bent and lenses are scratched or pitted and impairs vision.
3. Safety Shoesevery 6 month or when visible damage is observed.
4. Cover-Allevery 6 month or when already damaged or worn

	PERSONAL PROTECTIVE EQUIPMENT STANDARD	HES 002
	<i>Document Title</i>	<i>Document No.:</i>

6. EMPLOYEES TRAINING:

All new employees must undertake PPE awareness. This awareness is included in the Health & Safety Orientation in English and Spanish Languages. Annual awareness/ refresher must be conducted and evaluated to ensure that employees are knowledgeable with regards to ELITE personal protective equipment policy.

7. REVIEW AND EVALUATION

This HES policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	DRUG AND ALCOHOL POLICY	HES 003
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this policy is to:

- Support our responsibility and commitment toward out employees to ensure a safe and healthy workplace.
- Ensure that all employees at ELITECONSTRUCCIONES SL. have a work environment which is free of alcohol and drug use / abuse
- Outline the company’s expectations and requirements for creating and maintaining an alcohol and drug free work environment, and for dealing with substance abuse in the workplace.

3. SCOPE

The Policy applies at all workplace maintained and operated by the company, and to all employees of ELITE CONSTRUCCIONES SL. And also includes visitors and sub-contractors inside and outside of normal scheduled working hours.

4. DEFINITIONS

1. PROHIBITED SUBSTANCEES- includes illegal, drugs, or alcohol or prescription drugs not taken in accordance with a prescription given to the employee.
2. INVOLVE IN AN ON-THE-JOB ACCIDENT OR INJURY—means not only the one who was or could have been injured, but also any employees who potentially contributed to the accident or injury event in any way.
3. SUBSTANCE MISUSE-the habitual or intermittent use of alcohol or any drug or other substance which causes detriment to an individual’s health, social functioning and work performance.

5. POLICY

1. All individuals working at **ELITE CONSTRUCCIONES SL.** are expected to report fit for duty for schedule work and be able to perform assigned duties safely and acceptably without any limitation due to the use or after –effects of alcohol, illicit drugs, non-prescription drugs, prescribe medications or any other substance.
2. Off the job and on the job involvements with alcohol or drugs can have adverse effect upon the work place. The integrity of our work, the safety of other employees, the well-being of our employee’s families, and the ability to accomplish the goal of an alcohol and drug free work environment. As such, the Company wants to impress upon all employees that it has zero tolerance for who arrive at work under the influence of alcohol or drugs, and / or whose ability to work is impaired in any way by reason of the consumption of alcohol or drugs, or who consume alcohol or drugs on company or on project s and . Or areas maintain and operated by **ELITE CONSTRUCCIONES SL.**
3. The Company explicitly prohibits:

	DRUG AND ALCOHOL POLICY	HES 003
	<i>Document Title</i>	<i>Document No.:</i>

- 3a. the use, possession, solicitation for, or sale of narcotics or other illegal drugs, alcohol, or prescription medication without a prescription, on company or client premises or while performing an assignment.
- 3b. Being impaired or under the influence of illegal or illegal drugs or alcohol away from the company or client premises, if such impairments or influence adversely affect the employees work performance, the safety of the employee or of others, or puts at risk the company's reputation.
- 3c. Possession, use, solicitation for or sale of illegal drugs or alcohol away from the company and client premises, if such activity or involvement adversely affect the employees work performance, the safety of the employee or of others, or puts at risk the company's reputation.
- 3d. The presence of any detectable amount of prohibited substance in the employee's system while at work, while on the premises of the company or its client, or while on company business.
- 4. The Company will conduct drug and / or alcohol testing under any of the following circumstances:
 - 4a. Random Testing: Employees may be selected at random for drug and / or alcohol testing at any interval determined by the company.
 - 4b. For-Cause Testing:- The Company may ask the employee to submit to a drug and / or alcohol test at any time it feels that the employee may be under the influence of drugs alcohol, including, but not limited to the following circumstances.
 - 4b.1. Evidence of drug or alcohol on or about the employee's person or in the employee's vicinity.
 - 4b.2. unusual conduct on the employee's part that suggest impairment or influence of drugs or alcohol
 - 4b.3. Negative performance patterns
 - 4b.4. Excessive and unexplained absenteeism or tardiness
 - 4c. Post –Accident Testing: Any employee involved in on –the- job accident or injury under circumstances that suggest possible use or influence of drugs or alcohol in the accident or injury event may be asked to submit to drug and/ or alcohol test.
- 5. If an employee in tested for drug or alcohol outside of the employment context and the result indicate a violation of this policy, or if an employee refuses a request to submit to testing under this policy, the employee may be subject to appropriate disciplinary action, up to and possibly including discharge from employment. In such a case the employee will be given an opportunity to explain the circumstances prior to any final employment action becoming effective.
- 6. The disciplinary procedure will follow a three step progression:

	DRUG AND ALCOHOL POLICY	HES 003
	<i>Document Title</i>	<i>Document No.:</i>

- 6a. Warning with one (1) week suspension
- 6b. Warning with two (2) weeks suspension
- 6c. Termination

6. ROLES AND RESPONSIBILITIES

1. It is the responsibilities of all supervisor to identify the situation in which they have concerns about an individual's immediate ability to perform their job, and take appropriate steps. Where necessary, they will remove any employee who is suspected of violating the provision of this policy from company premises, pending investigation and a decision on appropriate consequences including potential disciplinary action.
2. The following requirement it's meant to provide the supervisor with guidance on how to administer this policy; however, not every situation can be predicted.
 - 2.A** If an employee, visitor or contractor arrive at the work place,(on company property), company maintained or operated project site) and the supervisor have reasonable cause to suspect that the employee, visitor or contractor is under the influence of alcohol or drugs, the supervisor shall immediately remove him/ her from the work environment. In the event the supervisor has any doubt as to whether the team member is, or is not impaired, the supervisor should err on the side of the caution and remove him/ her from the work environment.
 - 2. B** Unexpected circumstances can arise when an off-duty employee is requested to work. It is the employee's responsibilities to refuse the request and ask that the request be directed to another person if the employee is unfit due to the influence of alcohol or other drugs.
 - 2. C** Employees who are prescribed medication are expected to consult with their personal physician or pharmacist to determine if medication use will have any potential negative effect on job performance. They are required to report to their supervisor if there is any potential risk, limitation or restriction for whatever reason that may require modification of duties or temporary reassignment, and provide appropriate medical verification on restriction in performance of duties.
 - 2. D** If an employee believes an individual holding a more senior position is in violation of this policy, they are encouraged to get a second opinion where possible. They are also expected to notify the Safety Department and the General Manager.
3. Safety Department should investigate accidents and incidents for signs of substance misuse and prepare the corresponding results.

	DRUG AND ALCOHOL POLICY	HES 003
	<i>Document Title</i>	<i>Document No.:</i>

4. Safety Department should contribute to the development and facilitation of awareness-raising programs.

5. General Manager should ensure that every ELITE CONSTRUCCIONES SL employee complies with the provision of the policy.

7. EMPLOYEES TRAINING




Drug and Alcohol policy awareness is included in the Health & Safety Orientation in English and Spanish Languages. Annual training/refresher to be conducted and evaluated to ensure that employees are knowledgeable with regards to ELITE Drug and Alcohol policy.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	HAZARD COMMUNICATION	HES 004
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 2 years to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	Revised the training awareness section

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	HAZARD COMMUNICATION	HES 004
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this Standard is to provide a safe working environment through hazard communication to ELITE CONSTRUCCIONES SL employees regarding chemicals. This program will also promote safety in the workplace through information and accountability by the respective supervisors and the affected employees.

3. SCOPE

This Standard applies to all work areas operated and maintained by ELITE CONSTRUCCIONES SL where hazardous chemicals are known to be present.

4. DEFINITIONS

1. HAZARD COMMUNICATION—comprehensively addressing the issue of evaluating and communicating chemical hazards to employees on container labeling, Material Safety Data Sheet and employee training.
2. HAZARDOUS MATERAILS—any purchased or produce material or chemical which is a physical or health hazard.
3. HEALTH HAZRD-- any materials or chemical for which there is statistically significant evidence base on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees.
4. PHYSICAL HAZARD—any material or chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, unstable 9reactive) or water reactive.
5. EMERGENCY—an occurrence such as but not limited to, equipment failure, rupture of containers, failure of control equipment, which may or does result in a release of a hazardous substance/chemical into the workplace.
6. MATERILS SAFETY DATA SHEET (MSDS)—A written or printed materials furnished by the chemical manufacturer or the distributor containing information about a chemical. MSDS must list the chemical product and company information; composition/ information on in gradients; hazard identification; first aid measures; firefighting measures; accidental release measures; handling and storage; exposure control/ personal protection; physical and chemical properties; stability and reactivity; toxicological information; ecological information; disposal consideration; transportation information; regulatory information; other information.
7. LABELS—written, printed or graphic material displayed on or affixed to containers of hazardous chemical. Label must contain appropriate hazard warning and identify the chemical as it appears on the MSDS.
8. CONTAINER-- anything that are holds hazardous chemical likes bags, barrels, bottles, boxes, cans, cylinder, drums, storage tanks, or the like. For the purposes of this standard, engines, fuel tanks, or other operating systems, in the vehicle, are not considered to be containers.

	HAZARD COMMUNICATION	HES 004
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9. NON-HAZARDOUS CHEMICAL

The following products are exempt from the hazard communication procedure;

- Tobacco and tobacco products
- Wood or products, including lumber which will not be processed, where only flammable or combustible hazards exist.
- Wood or wood products which have been treated with a hazardous chemical covered by the standard, and wood which may be subsequently sawed or cut Generating dust, are not exempted.
- Article which do not release or otherwise result in exposure to a hazardous chemical under normal use.
- Food, drugs, and cosmetics intended for personal consumption or use by employees in the work place.
- Consumer products which are used in the same manner as a consumer would use the product (Similar concentration, packages quantity duration and frequency of use)

5. PROCEDURE

1. ACCOUNTABILITY

Person with supervision oversight, including Department area and Project Supervisor, are required to ensure all hazardous chemicals in their department, area or project contain proper labelling, have MSDS available, and ensure employees and other personnel who come in contact with hazardous materials and chemical are trained in accordance with this procedure.

2. INVENTORY LIST

2.1 Each Department Head, area and project supervisor has the responsibility to maintain an inventory list of known chemicals in their respective area of command or authority. A second copy of this inventory list of hazardous chemicals should be forwarded and provided to the office of safety, with a copy of MSDS.

2.2 The chemical inventory list must be available to all employees in the area during their working hours and must be located in their work area.

2.3 employees who have questions about the chemical inventory list should contact immediate supervisor.

3. LABELLING

3.1 The purposed of container labeling is to provide employees with an immediate warning about hazard of a materials they may use and to direct the chemical handler to the appropriate MSDS.

	HAZARD COMMUNICATION	HES 004
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3.2 The Department Head, area or project supervisor have the responsibility to ensure all known hazardous chemical present at their area or project must display a precautionary label stating;

- Clear listing of the contents
- Any and all appropriate hazard warning
- The name and address of the manufacturer or importer

3.3 All labels on incoming chemical must not be defaced in any way. Observation or other detection or defaced labels must be immediately reported to the supervisor so appropriate label can be applies.

3.4 Portable or Secondary Container

All portable or secondary containers of hazardous chemical required labeling. Employees who have question about portable container labeling should contact their immediate supervisor.

3.5 The employees who uses the portable container is responsible for placing 5the labels on the containers, and the department head, area or project supervisor responsible to see that labeling is done.

3.6 At a minimum, these portable containers must have the name of the chemical and appropriate hazard warning.

4. MSDS / SDS

4.1 MSDS are the primary means of conveying information concerning Chemical hazard to the employers and employees.

4.2 Each person in charge of a department, area or project is required to have

- MSDS for each hazardous chemical present in their workplace
- MSDS readily available to employees
- A secondary copy of each MSDS furnished to the safety department

4.3 If MSDS are not available or new chemical in use do not have MSDS employees should contact their immediate supervisor.

5. EMPLOYEE TRAINING AND EDUCATION

5.1 Effective employee training and education is the most critical component of the hazard communication program. A properly conducted training program will ensure that employees are aware of hazard in the work place and appropriate control measures to protect them.

5.2 The Safety Department coordinate the employee training and education program for the company.

5.3 All employees who work in areas where hazardous chemical are use / or maintained and those who may be exposed in an emergency are involved in the employee training and education program. The training and education program is presented in two parts:

	HAZARD COMMUNICATION	HES 004
	<i>Document Title</i>	<i>Document No.:</i>

5.3a General Hazcom Awareness

5.3b Specific Chemical Awareness

5.4 General Hazcom Awareness

- Explanation of the Hazards Communication Standard
- Location of availability of written hazards communication program
- Areas and activities where hazards chemical are present
- General introduction of chemical hazards, labelling, and materials safety data sheets (MSDS).

5.5 Specific Chemical Awareness

- Review of the SDS/MSDS
- Location of hazardous chemical in the work area
- Discussion of methods and means of determining / detecting the presence / release of hazardous chemical in the work area.
- The chemical and physical health hazards in the work area.
- Review of appropriate work practices, personal and protective equipment and emergency procedures.
- Access to safety and health information
- List of hazardous chemical and materials safety data sheet
- How to obtain additional information.

5.6 New Employees

- a. Whenever a person is hired for employment, hazards communication training and education will be provided at the time of their initial assignment.
- b. New training will be provided by the safety department as part of the New Employees Orientation and prior to handling hazardous chemicals.

5.7 New Hazards

- a. There are three ways in which new hazards may be introduced:
 1. A new hazardous chemical may be brought into the workplace; or
 2. A current hazardous chemical in use may exposed additional employees in the work area; or
 3. A former non-hazardous chemical may begin to be used in a manner that is hazardous.
- b. Whenever anew hazards is introduced the immediate supervisor is responsible for ensuring that specific hazards training is provide to all affected employees prior to the introduction of the hazard.

5.8. Employees will be trained again whenever there is a change in potential hazards from chemical found in their work area or whenever a periodic inspection or audits reveals there are inadequacies in the employee's knowledge or use these procedures

5.9. Record keeping of Training

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Training records shall be maintained by the Safety Department for at least two (2) years.

6. NON ROUTINE WORK

6.1 Occasionally, employees will be asked to perform non routine work, which can be defined as work not normally performed by an employee during the normal course of job duties;

Example of non- routine work could be, but not limited:

- Confined Space Entry work
- Building and structural repair
- Using internal combustion engines in enclosed areas.

6.2 The Department Head, Area supervisor or project supervisor will determined the need for non-routine work and the hazards associated with the work. The safety department can provide assistance to determine the hazards involved.

6.3 The Department Head, Area supervisor or project supervisor will ensure that employees performing the non-routine work have been properly trained and informed on the hazards associated with the work and of the procedures/ permits to follow.

6.4 The safety Department will assist in the training of employees performing the non-routine work upon proper communication from their supervisor.

6.5 Employees share in the responsibility by ensuring that their immediate supervisor knows that non routine work will be performed.

6.6 Employees should contact their immediate supervisor with questions concerning non routine work.

7. HAZARDDOUS CHEMICAL EMERGENCIES

7.1 In the event of hazardous chemical spill, the immediate supervisor, safety department and project manager must be notified right away.

7.2 A hazardous chemical spill is not limited to, but may consist of the following;

- Chemical release into the environment above the manufacturer suggested level of safety. Examples may be including spilling ammonia on the floor in a closed environment.
- Unconsciousness of a person who may be around on the chemicals. This area should not be entered into until hazards have been fully determined and appropriate countermeasures have been made.
- Fume/vapour exposure may occurs and cause a sense of burning or irritations to the mouth, nose, throat, chest or eyes. Dizziness, nausea, or presence of strong odour may exist. Ventilate immediately.
- Skin/eye contact with a hazardous chemical is to be treated as suggested on the first aid section to the MSDS for the chemical/ material protective equipment by the manufacturer may result in injury or death.

7.3 At no times are employees, supervisors or other person allowed to knowingly work in an unsafe location or manner on any areas operated /or maintain by ELITE CONSTRUCCIONES SL. that may raise the level of exposure to a hazardous chemical.

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6. RESPONSIBILITIES

6.1. EMPLOYEE

- 1.1 Being familiar with and complying with the contents of this program
- 1.2 Knowing the hazards and protective measures for the hazardous materials/ chemical used in their work area.
- 1.3 Attending required training
- 1.4 Planning and under taking task in accordance with established procedure and good safety practices
- 1.5 Using personal protective equipment
- 1.6 And clothing in accordance with prescribed training.

6.2. DEPARTMENT HEADS, AREAS SUPERVISORS, PROJECT SUPERVISORS

- 2.1 Identifying hazardous materials/ chemicals present in their work area
- 2.2 Maintaining an inventory list of hazardous materials/chemicals present in the work area.
- 2.3 Ensuring hazardous materials / chemicals are appropriately labelled or posted.
- 2.4 Obtaining MSDS for hazardous materials/chemicals used in their work area
- 2.5 Ensuring MSDS are available to employees
- 2.6 Ensuring employees have been properly trained on physical hazards, health hazards, emergency procedures, and safe handling procedures for hazardous materials/chemicals used in their work area.
- 2.7 Ensuring that employees follow established safety procedures.
- 2.8 Maintaining a copy of this written program in their workplace.

6.3. SAFETY DEPARTMENT, SAFETY OFFICERS

- 3.1 Developing, implementing and evaluating the Hazard Communication Program.
- 3.2 Assisting Department Heads, Area supervisors and Project Supervisors in identifying hazardous materials/chemicals in a work area and evaluating potential hazards.
- 3.3 Providing Hazard Communication Training to all employees.
- 3.4 Recommending appropriate engineering controls, administrative controls and personal protective equipment.

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6.4. PROJECT MANAGER

- 4.1 Ensure that every ELITE CONSTRUCCIONES SL employee complies with the applicable requirements of this Procedure.
- 4.2 Provide the resources needed in the implementation of this Procedure.

7. EMPLOYEES TRAINING

- 7.1 Classroom and visual presentation are the method use to share the information.
- 7.2 Assessment is given at the end of the presentation to ensure that employee fully understands with ELITE Hazardous Communication programs.
- 7.3 Annual training/refresher will be conducted and evaluated to ensure employees are knowledgeable with regards to ELITE Hazardous Communication program.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	CONFINED SPACE ENTRY	HES 005
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

This procedure applies to all personnel involved in confined space entry that work at locations operated by ELITE CONSTRUCCIONES SL where confined space activities are to be performed at Client's area, then their confined space procedure and permitting will apply.

A. PURPOSE

The purpose of this procedure is to identify confined space and outline the requirements for Entering/working in confined space for any reason, including inspection, maintenance, cleaning and emergency response or rescue.

C. DEFINITIONS:

ASPHYXITION—Suffocation from insufficient oxygen in the air, airway obstruction or loss of the pulmonary function

ATMOSPHERE—refers to the gases, vapours, mists, fumes, and dust within or outside a confined space

ATTENDANTS—an individual stationed outside the confined space who trained and required by this standards, verifies –safety entry conditions, maintains constant communication with those inside the space, and whose primary duty is to summon help should there be any indication of endangerment to those inside the space.

AUTHORIZED ENTRANT—an employee who is authorized by the employer to enter a confined space and has received appropriate training to perform his or her assigned duties

BLANKING OR BLINDING—The absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakages beyond the plate.

CONFINED SPACE—an enclosed space (e.g. tank, vessel, piping, storage bin, silo, vault, pit, open-topped space more than four feet deep) having all of the following characteristics:

- a. Large enough and so configured that an employee can bodily enter and perform assigned work;
- b. Has limited or restricted means for entry or exit; and
- c. It is not designed for continuous human occupancy.

DOUBL BLANK AND BLAEEED—the closure of a line, duct, or pipe by closing and locking or tagging two inline valves by opening and locking or tagging a drain or vent valve, which is open to the atmosphere, in the line between the two closed valves.

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EMERGENCY—any occurrence (including any failure of hazard control or monitoring equipment) or events internal or external to the confined space, which could endanger entrants.

EMERGENCY RESPONSE TEAM—the group of the individual trained to perform emergency rescue operations that are designated by the company. When working inside clients premises, their approved emergency response team will designated as such.

ENGULFMENT—the surrounding and effective capture of a person by a liquid or finely divided solid substance that can be aspirated to cause death by filling and plugging the respiratory system or that can exert enough force on the body to cause by strangulation, constriction, or crushing.

ENTRY—when any part of the body intentionally passes through the opening of the confined space, including when any part of the body break the plane of an opening into the space.

Note: To come under the provision of this standard, the space and the opening must be large enough for people to bodily enter the space. Utilizing opening on vessels where only part of body extremities (hand/arms) can be exposed are not considered confined space entries.

HAZARDOUS ATMOSPHERE—an atmosphere which exposes employees to the risk of injury, acute illness, and incapacitation, impairments of ability to self-rescue, or death from one or more of the following causes:

- a) A flammable gas, vapors or mist in excess of 10 percent its lower explosive limit(LEL)
- b) An airborne combustible dust at a concentration that obscure vision at a distance of five feet (1.52m) or less
- c) An atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
- d) An atmospheric concentration of any substance for which a permissible exposure limit is published in subpart Z of 29 CFR part 1910 and contaminant for which OSHA HAS NTO DETERMINED PERMISSIBLE EXPOSURE LIMT MAY BE PRESENT IN THE PERMIT SPACE atmosphere, OSHA recommends employer consult other sources of information such as material safety data sheet, which comply with the hazards communication standard 1910.1200, for guidance in establishing the acceptable environment condition for entry by their employees or and;
- e) Any atmospheric condition recognized as immediately dangerous to life or health

IMMEDIATELY DANGEROUS TO LIFE OR HEALTH (IDLH)—any condition that poses an immediate threat to life, or that would cause irreversible or immediate adverse health effects or may result in eye damages, irritation or other conditions that would interfere with an individual ability to escape unaided from a permit space

ISOLATION—the separation of the confined space from un wanted forms of energy which could introduce serious hazards to confined space entrants, isolation is accomplished by such means as blanking or blinding ;removal or misalignments of pipe sections or spool pieces; double block and bleed; or lockout/tag out of all energy sources.

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LOWER EXPLOSIVE LIMIT (LEL)—minimum concentration of a combustible gas, vapour or dust in the air which ignites in the presence of an ignition source.

NON- PERMIT CONFINED SPACE—a confined space with which no inherent hazards is associated

OXYGEN- DEFICIENT ATMOSPHERE—an atmosphere containing less than 19.5% oxygen by volume

OXYGEN ENRICHED ATMOSPHERE—an atmosphere containing more than 23.5% oxygen by volume

PERMIT REQUIRED CONFINED SPACE-- a confined space that has one or more of the following characteristics:

- a) Contains a known or potentially hazardous atmosphere;
- b) Contains a materials that can engulf an entrant;
- c) Configured such that or by a floor that slopes downward and tapers to a smaller cross section ; or
- d) Contains any other recognized serious safety or health hazards

RETRIEVAL SYSTEM—the equipment use for non-entry recue of person from permits spaces (include the retrieval line, chest or full body harness, wristlets if appropriate , and lifting device or anchor)

RESCUE SERVICE—the personnel designated by the company to rescue employees from confined spaces

D. ROLES AND RESPONSIBILITIES

1. Employees (confined space entrant and attendants) shall be responsible for;
 - Understanding the requirements of this confined space entry procedures
 - Annually attending confined space entry training provided by safety department or equivalent ;
 - Person who enter confined space , and those assigned to the require attendants position, must attend confined space entrants and attendants training
 - Person who will be assigned the position of entry supervisor must attend confined space entry supervisor training
 - Performing assigned duties according to the procedure listed in this procedure ;
 - Immediately notifying his or her supervisor of any problem or questioned regarding confined space work
2. Confined space attendants Shall be responsible for;
 - Checking personnel in and out of the confined space
 - Being alert to all situations which may adversely affect those inside including the danger of leaving his or her post while personnel are still within the confined space ;
 - Established and maintaining continuous contact (visually, verbally, tagline, whistle or any approved means of communication)
 - Giving agreed/approved signal for evacuating the confine space personnel working within the confined space during emergency situations
 - Ensuring awareness that under no circumstances is he/she to attempt to enter the confined space before additional help has arrived

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- Wearing an orange / luminous reflective vest
3. Supervisor shall be responsible for;
 - Being familiar with the task to be performed
 - Together with the safety officer, checking that the vessel / tank has been emptied, cleaned and purged and is safe to enter.
 - Ensuring that all personnel working in the confined space are properly trained and informed of the hazards associated with confined space entry
 - Ensuring the all personnel working inside know what to do in an emergency and have been issued the correct protective clothing and equipment
 - Assuring that all safety equipment and job tools necessary to safety complete the assigned work in the confined space are present and in good working condition
 - Understanding the entire confined space entry procedure and all emergency plans and procedures.

 4. Safety Officer / HES Office personnel shall be responsible for:
 - Providing confined space training for entrant, attendants and entry supervisor
 - Checking the contents of the vessel or tank and its hazardous/ harmful effect and cooperation with the supervisor
 - Checking all precautions are taken and are adequate
 - Ensuring that personnel on standby duty are conversant with the evacuation procedure and breath apparatus (B.A)sets

 5. Project Manager shall be responsible for;
 - Ensuring that all employees of ELITE CONSTRUCCIONES SL. Shall comply with all the provision of this procedure, and;
 - Ensuring the provision of all the needed resources in the implementation of this program

E. PROCEDURE

E.1 The supervisor together with the safety officer shall check the specified work instructions to determine who is responsible in preparing the confined space, including traces of all of its content. If it is specified that the contractor (ELITE CONSTRUCCIONES SL) will do the preparation (emptying, cleaning and purging), approved procedures of the clients will be followed and implemented.

E.1 the supervisor shall be thoroughly inspect that all lines leading to the confined space are physically locked. The confined space will be emptied, regardless of its contents, to the extents as practicable as possible. Cleaning shall be performed from the outside of the confined Space where practicable.

E.3 Supervisor shall conduct Pre Job tool box talk to discuss the scope of work to all affected employees.

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E.4 Proper selection of protective clothing, respiratory equipment, and emergency stand-by equipment as well as fire precaution shall be taken prior to entering the confined space.

E.5 All confined space where hazardous atmosphere may occur will initially be tested of oxygen, flammable gases and toxic substances at intervals agreed by the supervisor and safety officer. Test will be conducted in such manner that will ensure all areas of the confined space are free of harmful gases and are not oxygen deficient or enriched.

E.6 Personnel will not be permitted to enter any confined space where the oxygen Content is below 19.5% or above 23.5% by volume.

E.7 A stand-by attendant (hole watch) should be stationed outside the confined space.

E.8 If conditions change after the authorization to start work activities begins, then a retest and evaluation of the area must be done to confirm that no hazard exists.

E.9 Only authorized personnel shall be allowed to enter the vessel. Anyone entering the confined space should wear a harness attached to a life line leading out of the confined Space opening.

E.10 Adequate safe staging area erected work platform should be maintained with clear and easy access to the confined space opening.

E.11 All possible ignition sources shall be removed from the immediate area where the installation or application of flammable or combustible substances is required within the confined space. Under no circumstances will any gas cylinder be place inside a confined space.

E.12 Temporary lighting to be use and installed inside the confined space should be suitable and certified intrinsically safe. All cables should be run through alternate opening or be tied or padded or insulated through the entry point to prevent contact and damage to cables. Light should be protected with guards to prevent breakage.

E.13 Ventilation where necessary will be provided by either natural or mechanical means. Ventilation equipment and confined space shall be bonded to an approved grounding conductor to prevent the build-up of a static electrical charge.

E.14 When hot work is to be carried out inside the confined space, all combustible materials shall be removed from the area

During hot work there will be sufficient artificial air movements installed at entrance/exit points to ensure fumed are force out of the confined space and fresh air is continuously introduced.

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E.15 All hot works activities taking place in close proximity of the entrance to the confined space where there may be a possibility of contaminating the confined space will be suspended until work within the confined space is completed.

E.16 Prior to the use of any solvents or chemicals inside a Confine Space, all requirements stated on the Materials Safety Data Sheet (MSDS) will be met.

E.17 All portable hand tools shall be fitted with a dead man (safety) control switch. Portable tools where the power can be locked is the “ON” position shall not be used.

E.18 Adequate access to an egress from all confined spaces will be provided using ladders, scaffolding or purpose made platforms.

E.19 Whenever a Confined Space is left unattended and unoccupied the Confined Space shall be adequately signposted and access ways secured to prevent unauthorized entry.

E.20 In the event of an emergency, Company Personnel trained in advanced rescue, will be utilized to assist in directing the rescue effort pending the arrival of the Company designated rescue service.

F. EMPLOYEES TRAINING

F.1 Classroom and visual presentation are the method use to share the information.

F.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Confined Space standard.

F.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

F.4 Annual training/refresher will be conducted and evaluated to maintain employee’s knowledge and awareness with regards to ELITE Confined Space standard.

F.5 English and Spanish Languages are used in visual presentations to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Confined Space standard presentation

G. CONFINED SPACE STANDARD REVIEW

G.1 This program shall be reviewed every two years and revised as necessary to protect employees from confined space hazards.

G.2 The program shall be reviewed anytime that there is;

- An unauthorized entry of a confined space;
- A hazard discovered that was not addressed previously;
- the occurrences of an injury or near miss; and

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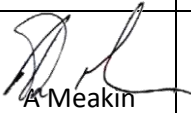
- Personal complaints

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	VEHICLE SAFETY	HES 006
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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	VEHICLE SAFETY	HES 006
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this procedure is promote a heightened level of safety awareness and the safe operation of ELITE CONSTRUCCIONES SL owned, rented or leased motor vehicles, to encouraged the safety of drivers passengers and the public, and to minimize losses, damages, and claims against the company.

3. SCOPE

This procedure applies to all vehicle use performed in support of all ELITE CONSTRUCCIONES SL projects and operations.

4. RESPONSIBILITIES

1. Drivers shall be responsible to:

- comply withal instructions included in this procedure
- own, maintain and carry appropriate driving license and identifications
- secure Supervisor’s authorization to operate the vehicle of concern
- drive defensively at all time and make every effort to operate all vehicle safety
- report immediately all incidents to their supervisor.

2. Supervisor shall be responsible to:

- ensure that the drivers or operators of vehicles are qualified and in a healthy and in a non-intoxicated condition prior to operating any vehicle
- Ensure that all employees familiar with the vehicle safety policies and procedures, Accident/incident reporting requirements and the accident review process

3. Safety officer shall be responsible to:

- ensure that all light and heavy vehicle operators are given proper orientation and training in Accordance with the requirements of this procedure
- Determine additional trainings needed or other positive actions required dealing with driver error
- Insist that all vehicles are maintained for safe operation and ensure that only authorized personnel are allowed to operate company vehicles
- Evaluate the existing vehicle safety procedure and determine if any changes should be recommended in light of the facts surrounding an incident / accident in an effort to prevent the occurrence of similar events in the future.

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4. Mechanic Supervisor / Mechanic shall be responsible to:

-ensure that all vehicles are in a safe mechanical condition for operation

5. Safety supervisor shall be responsible for:

- supervise the assessment and evaluation of drivers/operators

6. Project Manager shall be responsible to:

- participate in the assessment and evaluation of drivers and operators

- ensuring that all employees of ELITE CONSTRUCCIONES SL shall comply with all the provision of this procedure and providing

- ensuring the provision of all the needed resources in the implementation of this program

- reviewing personally each accident and take all steps necessary to prevent future incidents and accidents.

5. PROCEDURE

D.1 GENERAL INSTRUCTION AND REGULATIONS

D.1.1 Never drink alcohol or be impaired by drugs and drive.

D.1.2 Respect and obey all road signs and speed limitations at all time

D.1.3 all company drivers have to adhere to the traffic rules and regulations of Equatorial Guinea.

D.1.4 Make sure all documentations and licenses are valid and copies are kept in the vehicle

D.1.5 Never use communication device (two way radio, mobile phone) when driving. Vehicle must be stopped in a safe way before utilizing any communication device.

D.1.6 Eating and drinking while operating a vehicle is strictly forbidden at all time.

D.1.7 Never smoke when operating a vehicle. Smoking inside any company vehicle is also forbidden.

D.1.8 Seat belts (where fitted by the manufacturer) must be worn by all occupants of the vehicle (drivers and passenger/s).

D.1.9 all vehicles must be reverse-parked at designated parking areas. Where parking areas are not marked, vehicles should be reverse-parked.

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D.1.10 all reversing heavy equipment, trucks and buses should be assisted by a banks man reversing will not commence without a designated banks man.

D.1.11 Drivers are fully responsible for their vehicle, passengers and loads.

D.1.12 Drivers are responsible to inspect their vehicle daily and defects found must be reported and repaired as soon as possible.

D.1.13 Drivers shall ensure that, before starting the vehicle, the area near and under the vehicle is free from persons.

D.1.14 Drivers must cooperate with periodic spot checks carried out on their vehicle.

D.1.15 Drivers shall remove ignition keys from the vehicle when it is not in use.

D.1.16 any driver involved in an accident will be required to go to the ELITE CONSTRUCCIONES SL Clinic to have an alcohol test as soon as possible. All motor vehicle incidents/accidents involving ELITE CONSTRUCCIONES SL vehicle shall be reported in accordance with the provisions of HSE 007 incident investigation and reporting procedure.

D.1.17 if there is reasonable suspicion that a driver has consumed alcohol, the driver will be asked to submit to an alcohol test.

D.1.18 Disciplinary action will be taken against violators of this procedure, and this may include termination.

D.2 REQUIREMENTS WHEN TRANSPORTING PERSONNEL

D.2.1 personnel shall not be transported in the rear of pickups and truck beds.

D.2.2 Driver should not transport more passengers than the number of seatbelts provided in the vehicle

D.2.3 Unauthorized persons shall not be transported in Company vehicles.

D.2.4 Passengers who refuses to use seatbelts shall be asked to go down from the vehicle.

D.2.5 Passengers have the responsibility to make sure that the driver uses his seatbelt.

D.3 REQUIREMENTS WHEN TRANSPORTING MATERIALS

D.3.1 It is the responsibility of the driver to transport materials properly.

D.3.2 the driver should ensure that the load is properly secured and tied down if necessary.

D.3.3 the driver should ensure that the load does not extend over the sides of the vehicle warning flags should be installed for loads extending beyond the front or rear of the vehicle and under no circumstances will extended loads be over than two (2) meters.

D.3.4 passengers who refuse to use seatbelts shall be asked to go down from the vehicle.

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D.3.5 Passengers have the responsibility to make sure that the driver uses his seatbelt.

D.4 VEHICLE REQUIREMENTS

D.4.1 ELITE CONSTRUCCIONES SL shall provide vehicle which are of adequate capacity for their

Required duty and designed for the operation to be performed.

D.4.2 ELITE CONSTRUCCIONES SL shall maintain all the vehicles to a high standard by periodic Service checks.

D.4.3 all tired on a vehicle shall be of the same type, tires which have exposed tread wear indicators, breaks, cracks, or have fabric showing shall not be used.

D.4.4 ELITE CONSTRUCCIONES SL vehicles shall be equipped with a spare tire and tools required to change a wheel and a hazard sign (a red triangle).

D.4.5 ELITE CONSTRUCCIONES SL vehicles shall be equipped with a fire extinguisher.

D.4.6 ELITE CONSTRUCCIONES SL vehicles shall be equipped with an audible reversing alarm.

D.4.7 ELITE CONSTRUCCIONES SL vehicles must be taken for service on or before the specified odometer reading or the date shown preventive maintenance service sticker.

6. EMPLOYEES TRAINING

F.1 Classroom and visual presentation are the method use to share the information.

F.2 Assessment is given at the end of the presentation to ensure that employee fully understands with ELITE Vehicle Safety policy.

F.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

F.4 Annual training/refresher will be conducted and evaluated to maintain employee's knowledge and awareness with regards to ELITE Vehicle Safety Policy.

F.5 English and Spanish Languages are used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Vehicle safety Policy presentation.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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APPENDIX A

PREVENTABILITY / NON – PREVENTABILITY GUIDE LINES

All vehicle accidents should be considered preventable if any of the following basic safe driving and parking habits were not followed:

1. Complying with existing Equatorial Guinea traffic laws, signals and complying with ELITE CONSTRUCCIONES Company and its clients' premises driving rules.
2. Conceding the right of way.
3. Driving defensively, anticipating hazardous situations, and taking appropriate action to prevent an accident.
4. Concentrating on the driving job
5. Giving enough consideration to others.
6. Having control of the vehicle at all time.
7. Parking properly in designated parking areas where exist, when parking areas are not designated, parking where other vehicles are not likely to strike the parked vehicle.

SPECIFIC GUIDELINES FOR DETERMINING PREVENTABILITY

1. **Inter sections** – it is the responsibility of all driver to approach, enter and cross intersections prepared to avoid vehicles (even those improperly driven) the failure of the driver to do so must be considered in determining accident preventability. Accidents at intersections are preventable unless over whelming evidence to the contrary is given.
2. **Reversing** – all reversing accidents are preventable, whether or not a guide was involved in the maneuver.
3. **Front – end collisions** – a driver must maintain a safe following distance for an accident to be considered non – preventable.
4. **Rear – end collisions** rear end collisions preceded by a roll – back, an abrupt stop at a grade crossing or traffic signal, or failure to signal intentions are preventable.
5. **Overtaking**- as overtaking is a voluntary action, all overtaking accidents are preventable.
6. **Being Overtaken** – sideswipes and cut – offs involving ELITE CONSTRUCCIONES SL driver while he is being overtaken are preventable when he fails to yield to the overtaking vehicle by slowing down or moving to the right, where possible.
7. **Lane Encroachment** – any accident involving merging or lane encroachment may often be avoided through yielding to the other vehicle. Failure to take such action makes any resultant accident preventable.
8. **Opposing Vehicles** – even when an opposing vehicle enter the driver's traffic lane, it may be possible to avoid collision. For example, if the opposing vehicle is overtaking and the ELITE CONSTRUCCIONES SL driver does not slow down, stop or move to the right, he has failed to take reasonable action to prevent an accident.
9. **Turning** – accidents involving a failure to signal, properly position the vehicle for a turn, check mirrors and blind spots, or check pedestrian lanes, should be considered preventable.
10. **Hazardous Situation** – keeping within posted limits is not sufficient precaution when unusual or hazardous conditions (heavy rain, Harmattan) call for further reduction of speed. Accidents resulting from driving too fast for conditions are preventable.

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11. **Fixed Objects** – generally all collisions with fixed objects are preventable.
12. **Parking** – preventable accidents include those resulting from
 - a. Failure to park in locations clearly designated for parking (where they exist)
 - b. Failure to park completely within parking spaces defined by stripes, chains, upright posts, and barriers laid on the parking area (where they exist)
 - c. Parking on roads, streets, highways or their shoulder area where a parking zone is not clearly marked, and
 - d. Parking in the wrong direction. A disabled vehicle is not considered properly parked unless it is off main travelled portion of the road and displays proper warnings as required.
13. **Non – Collision, non-collision** accidents should be ruled preventable when they are the result of incorrect emergency action taken by the driver to avoid a collision, as this is an indication that the driver is driving too fast for condition or is not paying attention, incorrect response to emergency conditions may also contribute to the accident, and must be considered in determining preventability.
14. **Traffic Circles/Roundabout** - vehicles in a traffic circle have the right of way, but any accident which could have been avoided by the driver (e.g. yielding the right of way) should be ruled preventable.

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APPENDIX B

DRIVER EVALUATION FORM

Onboard / Road test Observation

Driver: _____

Vehicle type/Description: _____

Evaluator: _____

Date Observed: _____

Note: Onboard/road test Observation measures the driver's proficiency in specific areas of Operation and defensive driving. All of the skills tested are important to help prevent accident.

Pre-trip inspection	Yes	No	Comments
General condition of vehicle			
Completes appropriate brake test			
Condition of tires (tread and pressure)			
Checks Rear view and side view mirror adjustments			
Checks fuel, oil and water levels			
Carries the appropriate license/vehicle documents			
Starts vehicle properly			
Adjust driver's seat			

Placing Vehicle in Operation	Yes	No	Comments
Pre-checks gauges before departure			
Uses seatbelt			
Scans mirrors before moving			

Basic Driving Skills	Yes	No	Comments
Steers Smoothly, checks in all direction			
Maintains proper speed for conditions, and within speed limit			
Accelerates and slows smoothly, avoids severe braking			
Makes complete stops at all stop signs and signals			
Stays in the center of the lane of traffic			
Maintains proper following distance			

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Uses appropriate passing procedures, avoids swerving			
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Approaches intersections with caution			
Correctly anticipates moves of other drivers			
Grants right of way to pedestrians			
Monitors gauges while driving			
Uses appropriate gears – does not over rev engine			
Uses cell phone only when safety stopped off street or highway			

Backing and Parking	Yes	No	Comments
Stops in correct position			
Uses mirrors properly			
Comes to complete stop before changing gear to reverse			
Performs inside/outside post trip inspection			
Always applies hand brake when stopped			
Sets transmission in 1 st or reverse gear			

Summary and Recommendation(s):

- Passed: Approve to drive:** _____ pick – up
_____ Van
- _____ Bus
- _____ Truck (Concrete Mixer, Flat bed, Dump Truck)
- Failed: Re – test in _____ Months**
-

Comments:

Signature of Driver

Signature of Evaluator

	INCIDENT INVESTIGATION AND REPORTING	HES 007
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this procedure is to establish uniform approach in investigation, reporting and recording of all occupational incidents. This program also intends to:

- Highlight the aim of the investigation process, which is to recommend feasible and cost effective ways to avoid the recurrence of similar incidents.
- Establish a follow up procedure to ensure implementation of recommended actions.
- Communicate the lessons learned from the incident.

3. DEFINITIONS

1. Environmental Release- an accidental discharge of a physical, biological or chemical substance into the work place and/ or community
2. Fatality- an injury that results in loss of life
3. Fire / Explosion –an event where undesired combustions occurs
4. First Aid- when an employee, as a result of an accidents in the workplace receives on site first aid assistance (includes cleaning minor cuts, scrapes or scratches; treating a minor burn ;applying bandages, and /or dressing , cold compress, ice bag, and splints) without any days lost
5. Lost Time Injury (LTI)-any work related injury that prevent a worker from coming to work on the day following the day of injury
6. Occupational Illness- a condition that result from exposure in a workplace to a physical, chemical or biological agent that normal physiological mechanism are affected and the health of the health of the worker is impaired
7. Property Damage- when there is significant property damage

4. RESPONSIBILITIES

1. Employees shall be responsible to:
 - Report incidents to their immediate supervisor by the most direct means available
 - Cooperate with their supervisor and the investigation team in provision of all valid information required to complete the investigation report
 - Report all injuries to the ELITE CONSTRUCCIONES SL clinic
2. **Contractors shall be responsible to:**
 - Notify the ELITE CONSTRUCCIONES SL supervisor in-charge of the incidents

	INCIDENT INVESTIGATION AND REPORTING	HES 007
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- Initiate investigation and complete their personal report
- Report all injuries to ELITE CONSTRUCCIONES SL Clinic
- Provide all information required to complete investigation, reporting and recording

3. Supervisor shall be responsible to:

- Respond to the incident scenes as soon as they become aware of the incident
- Investigate the incident and fill out essential information at the Incident Report Form
- Communicate the incident to the other personnel in the company

4. Company Nurse shall be responsible to:

- Secure copies of the medical report after treatment (including first aid cases) and provide a copy to the safety department

5. Safety Officer shall be responsible to:

- Classify the injury in accordance with accepted standards (OSHA STANDARDS)
- Assist supervisor on completion of investigation and reporting of the incident
- Maintain record of incident and update the safety statistic board
- Assure completeness and adequacy of investigation report
- Prepare a status report of corrective action items for management review
- Coordinates follow-up on corrective actions.

6. Project Manager shall be responsible to:

- ensure that all employees comply with all the provisions of this Procedure
- ensure the provision of all the needed resources in the implementation of this Procedure
- review personally each incident/accident and take all steps necessary to prevent future recurrences

5. PROCEDURE

E.1. All incidents shall be reported and investigated as per the following classification:

- E.1.1 Fatality
- E.1.2 Lost time injuries (those requiring hospitalization)
- E.1.3 Medical Treatment injuries (recordable cases other than first aid)
- E.1.4 First Aid cases
- E.1.5 Environmental Release (Incident Impacting Environment)
- E.1.6 Property damage or loss of product
- E.1.7 Unplanned equipment outage/trips (pumps, compressors, generators, etc.)
- E.1.8 Fire

	INCIDENT INVESTIGATION AND REPORTING	HES 007
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E.1.9 Vehicular Incident

E.1.10 Near Miss

E.2. All incidents have to be reported immediately as soon as possible to the area supervisor and the Safety Department. Initial Investigation must be conducted not later than 24 hours from the time of incident.

E.3. Trained employees should administer first aid as required.

E.4. Arrange for transportation for injured employee(s) to medical treatment if required. A Safety Representative should be notified.

E.5. Hazard(s) at the incident scene should be eliminated if possible or guard the incident Scene if worker is critically injured.

E.6. The supervisor in the area where incident happened should conduct initial investigation and fill-out the relevant information in the Incident Report Form.

E.7. In Conducting the Incident Investigation and completing the Incident Report form, the investigating team must ensure the following have been completed:

E.7.1 Assessment of the scene

E.7.1.1 Inspection of site, equipment and/or material that were involved in the incident

E.7.1.2 Site must be secured especially in the case of a critical injury

E.7.1.3 Use of photographs, sketches and/or drawings of the incident indicating the sizes, distances and weights of objects appropriate

E.7.2 Interviewing

E.7.2.1 Interview employee(s) involved

E.7.2.2 Interview eyewitness (es)

E.7.2.3 Interview must be documented

E.7.2.4 Interview should be conducted as soon as possible not later than 24 hours

E.7.3 Identify the contributing factors

E.7.3.1 People

E.7.3.2 Equipment

E.7.3.3 Task

E.7.3.4 Process

E.7.3.5 Material

E.7.3.6 Work environment

E.7.4 Report writing – Record all findings of the incident investigation on the Incident Report Form ensuring that all requirements of the written procedure are covered.

E.7.5 Make recommendations for corrective actions

E.7.5.1 Responsibilities must be assigned for completion of the action plan.

E.7.5.2 Recommendations must focus on the corrective action(s) to all the contributing factors identified.

E.7.5.3 Recommendations should specify “What”, “Why” and “How” the corrective actions will be completed.

E.7.6 Ensure recommendations are acted upon

E.7.6.1 Responsibilities must be assigned for the follow-up of the corrective actions.

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E.7.6.2 Detail what has been done, who was completed the actions and when the actions were completed.

E.7.7 Ensure the recommendations are communicated to employees.

6. EMPLOYEES TRAINING


F.1 Visual presentation with examination is the method use for this training.

F.2 Annual training/refresher will be conducted and evaluated to maintain employee's awareness with regards to ELITE Incident Investigation and Reporting program.

F.3 Separate training for English and Spanish Language are conducted in this program.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	EXCAVATION AND TRENCHING	HES 008
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this procedure is to establish guidelines for the prevention of hazards associated with excavations.

3. SCOPE

This procedure applies to all excavations carried out by **ELITE CONSTRUCCIONES SL** personnel.

4. DEFINITIONS

3.1 BENCHING- a method of protecting employees from cave-ins by excavating the sides of an excavation to form one or a series of horizontal steps, usually with vertical near surfaces between levels.

3.2 EXCAVATION- any manmade cut cavity, trench or depression in the earth's surfaces, formed by earth removal.

3.3 HAND/MANUAL EXCAVATION- any excavation that uses only hands tools that breaking and removing earth surfaces. A typical tool used for hand excavation is a shovel.

3.4 MACHINE EXCAVATION- any excavation which uses machines for breaking hard surfaces like concrete or asphalt areas(e.g. jack hammer, concrete cutters, hydraulic or pneumatic tools, etc.) or removing earth surfaces (e.g. back-hoe, grader, loader, etc.).

3.5 SIDE, WALLS, and OR FACES- the vertical or inclined earth's surfaces formed as result of excavation work.

3.6 SHORING- a system of braces, upright and walls to protect people and the adjacent structures foundations in an excavation or trench form the collapse of the adjacent unstable soil.


3.7 TRENCH- a narrow excavation below the surface of the ground, where the depth greater than the width.

5. RESPONSIBILITIES

1. Employees shall be responsible to:

- Work safely and use all provides personal protective equipment.
- Be familiar with this procedure

2. Supervisor shall be responsible to:

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- Ensure that all personnel in his charge are familiar with this excavation and trenching procedure and that all safe working practices are adhered to
- Ensure that all know hazards or potential dangers areas are identified and necessary precaution have been taken
- Ensure that only qualified operators are allowed to use the machineries used in excavation

3. Safety officer shall be responsible to:

- Ensure that all safety precautions taken are adequate
- Monitor safety practices as the job progresses and that the supervisor have a copy of this procedure
- Ensure that personnel use appropriate personal protective equipment

4. Project Manager shall be responsible to:


- Ensure that all employees comply with all the provision of this procedure
- Ensure the provision of all needed resources of the implementations of this procedure.

6. PROCEDURE

- 5.1 Inspect the work site where the excavation will be carried out to identify obvious hazards like overhead power lines and water courses, so that preparations, planning and work excavation will be performed accordingly.
- 5.2 Determine the presence and location of underground electrical, telephone, instrument wires or cables and chemical, fuel or utility pipes with reference to up to date underground services drawing of area to be excavated.
- 5.3 Use a cable locator or other techniques such as exploratory to identify location of underground services.
- 5.4 Identify the location of underground services by erecting indicators, markers or locators.
- 5.5 Whenever possible, de-energize and / or isolate underground services within or for the excavation. if the underground utilities cannot be de- energized or the location and / or depth are not definite, then the method of excavation shall be established to minimize hazards by such means as:
 - Trial pit by hand excavation along the area to be excavated
 - Use of hand tools of the area of underground services
 - Insulate men and equipment from possible electrical contact
 - Use tools or equipment that will reduce possibility of damage to underground services and hazards to workers.
- 5.6 Prepare or mark available drawing and sketches, highlighting clearly the area and depth of excavation.
- 5.7 Define the method of excavation, manual and/ or machine excavation.
- 5.8 Determine whether gas test are necessary and at what stage of excavations they will be necessary.
- 5.9 Clearly define the scope of excavation and perform an inspection of the work area with the supervisor.

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- 5.10 Notify all concerned if the excavation will obstruct any roadway or access either partially or totally.
- 5.11 Mark on the ground the exact location and area of excavation using paint marking. Do not use pegs or pins.
- 5.12 Communicate to the work crew on the proper procedure and the hazards involved in the excavations.
- 5.13 Personnel shall not enter or perform work in an excavation which required their head to be below to the surface of the ground until;
 - 5.13.1 Satisfactory gas and oxygen test have been secured
 - 5.13.2 A ladder or stairway has been provided for safe entrance and exit.
 - 5.13.3 Adequate shoring and sloping of the trench wall has been provided if the depth exceed 1.2 meters
 - 5.13.4 Adequate provision to dewater the ground water is made.
- 5.14 Excavation more than 1.2 meters deep shall be treated as permit required confined space.
- 5.15 Excavation work shall be suspended if there is any change in the initial condition or when unexpected pipe, cable, concrete or other obstruction are uncovered
- 5.16 Excavation shall be inspected daily by the person responsible for the excavation. If evidence of possible cave-ins or slide is apparent, all work in the excavations shall cease until the necessary precaution have been taken to safeguard the employees.
- 5.17 Excavation shall be inspected periodically for presence of groundwater, change in soil condition and effect of weather such as rain or wind. Safe means of continuing the works shall be established as any condition changes.
- 5.18 Adequate means of dewatering excavation shall be provided as required.
- 5.19 If gas, toxic or flammable materials encountered, appropriate test shall be made to established the need of respiratory equipment, ventilations or other measures required to continue the excavation safely.
- 5.20 If the presence of any underground services is indicated, the underground services shall be exposed and exactly located by manual excavation (using hand tools).
- 5.21 All exposed cable and pipe should be adequately supported.
- 5.22 All trench (vertical sides) excavation greater than 1.2 meters in depth shall be shored or sloped to avoid collapse.
- 5.23 No mechanical excavation shall be made within the 1 meter of any underground services.

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- 5.24 Any excavation more than 1 meter shall be gas tested prior to start of each day work.
- 5.25 Excavated materials or mechanical equipment should not be place within 1 meter of the edges of any excavation. For excavation up to 1.2 meters deep, equipment and other heavy objects must be kept at least 2 meters from the edges of the excavation. For excavation of 1.2 meters or when it is necessary to operate heavy equipment from nearer than 2 meters from the edge, sheep piling, shoring and bracing shall be provided.
- 5.26 Appropriate permissions shall be obtained for entry of motors- driven excavation equipment into hazardous area.
- 5.27 Red concrete shall not be cut as the red colour concrete is used to mark underground electrical systems.
- 5.28 Barricades shall be place around the excavation and flashing light shall be installed at night if the excavations are not in a well-lit area.
- 5.29 Excavation, regardless of their depth, shall not be left unattended without steps being taken to prevent someone from inadvertently tripping, falling or driving in it.
- 5.30 Walkways or bridges shall be provided with standards handrails where employees and equipment are required or permitted to cross over excavations.
- 5.31 When personnel need to entry a machine excavated trench that is more than 1.2 meters, shoring shall be installed prior to entry.
- 5.32 Backfilled excavations shall be compacted to substantiate the load bearing capability of the surrounding area before the barricade is removed.
- 5.33 All newly entered items below the grade shall be entered into appropriate drawings.
- 5.34 At conclusion of the excavation, all hand tools, equipment and temporary shoring materials shall be removed.

7. EMPLOYEES TRAINING

F.1 Classroom and visual presentation are the method use to share the information.

F.2 Assessment is given at the end of the presentation to ensure that employee fully understand with ELITE Excavation and Trenching standard.

F.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

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F.4 Annual training/refreshers will be conducted and evaluated to maintain employee's knowledge and awareness with regards to ELITE Excavation and Trenching standard.



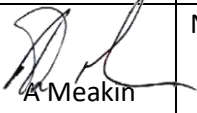
F.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Excavation and Trenching standard presentation.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	SCAFFOLDING SAFETY PROCEDURE	HES 009
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	13 Mar 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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	SCAFFOLDING SAFETY PROCEDURE	HES 009
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this standard is to define the minimum requirements for the safe design, erection, supervision, inspection, use, alteration, and dismantling of stationary and mobile scaffolds at all ELITE CONSTRUCCIONES SL facilities and project sites.

3. SCOPE

This Standard applies to all scaffolds erected and used by company employees and contractors at work areas operated and maintained by ELITE CONSTRUCCIONES SL.

4. DEFINITIONS

1. **BASE PLATE**- a metal base (with a central spigot) for distributing the load from a post/ leg of the scaffold.
2. **BEARER**- a horizontal member of scaffolding upon which the platform rest and which may be supported by ledgers.
3. **BRCE**- a tie that holds one scaffolding member in a fixed position with respect to another member.
4. **COUPLER**- a device for locking together the component parts of tubular metal scaffolding. The materials used for the couplers shall be of a structural type, such as a drop-forged steel, malleable iron, or structural grade aluminum.
5. **GUARDRAILS**- top rail and mid rails secured to uprights and erected along the sides and ends of platforms, to prevent workers from falling off an elevated work area.
6. **HEAVY DUTY SCAFFOLDING**- scaffolding designed and constructed to carry a working load not to exceed 75 pounds per square foot.
7. **LEDGER (STRINGER)** - a horizontal scaffolding member that extends from post to post and which support the putlo9gs or bearer forming a tie between the posts.

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8. **LIGHT DUTY SCAFFOLDING**- A scaffolding designed and constructed to carry a working load not exceeds 25 pounds per square foot.

9. **MAXIMUM INTENDED LOAD**- the total of all loads including the working load, the weight of the scaffolding, and such other loads as may be reasonably anticipated.

10. **MEDIUM DUTY SCAFFOLDING**-scaffolding designed and constructed to carry a working load not to exceed 50 pounds per square foot.

11. **MIDRAIL**- a rail approximately between the guard rails and the platform, used when required, and secured to the uprights erected along the exposed sides and ends of platform.

12. **MOBILE SCAFFOLD**- a rigid scaffold assembly supported by casters and manually moved horizontally.

13. **RUNNER**- the lengthwise horizontal bracing or bearing member or both.

14. **SCAFFOLDINGS**- any temporary structure (base-supported or under hung) used for supporting workmen and/ or materials at any height.

15. **SCAFFOLDING CRAFTSMEN (SCAFFOLDERS)** - employees who work under the direct supervision of the scaffold supervisor and who erect, alter, or dismantle scaffolds.

16. **SCAFFOLD FIELD INSPECTIONS CHECKLIST**- checklist with minimum requirements for field inspection of various types of scaffolds.

17. **SCAFFOLD SUPERVISOR**- the immediate supervisor of craftsmen erecting, altering or dismantling scaffolds in the area for which he is responsible, and who has the authority, training and experience necessary to competently direct scaffolding work and verify compliance with applicable standards.

18. **SCAFFOLD TAG**- shows whether or not a scaffold meets ELITE CONSTRUCCIONES SL. Requirements scaffold tags are color coded as follows:
 - 18.1 **REDSCAFFOLD TAG**- indicates that the scaffold has not been inspected or is not safe for use (by anyone other than scaffold craftsmen).
 - 18.2 **GREEN SCAFFOLD TAG**- indicates that the scaffold is complete, has been inspected, and is safe for use at the time of inspection. A green scaffold tag is valid for a maximum of one (1) week.

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- 18.3 YELLOW SCAFFOLD TAG-** indicates that the scaffold has been inspected, and is safe for use *only* by workers wearing a proper anchored personal fall arrest system, including full body harness and lanyard. A yellow scaffold tag is required whenever all guardrails or planks cannot physically be installed (e.g. due to interferences) or must be temporarily removed. A yellow scaffold tag does not permit intentional erection of an incomplete scaffold. A yellow scaffold tag is valid for one (1) week.
- 19. SUSPENDED SCAFFOLDINGS-** scaffoldings erected in steel structures (e.g. pipe racks) that are suspended/ hung from the structural steelwork.
- 20. TOE BOARD-** a barrier secured along the sides and end of the platform, to guard against the falling of materials/ personnel.
- 21. TUBE AND COUPLER SCAFFOLDING-** an assembly consisting of tubing that serves as posts, bearer, braces, ties, and runners, a base supporting the post, special couplers which could serve to connect the upright and to join the various members.
- 22. WORKING LOAD-** load imposed by men, materials, and equipment's.

5. PROCEDURE REQUIREMENTS

1. Scaffolding shall not be erected without permission from owner of the area. The following should be considered prior to scaffold erection:
 - 1.1 Identify and resolve potentials hazards and safe guards that the scaffolding activity may present to the scaffold erecting crew, personnel using the scaffold, and operating unit personnel in the area.
 - 1.2 Identify and resolve temporary egress/access of normal work activity due to restrictions caused by the scaffolding.
2. "Do not use "tag shall be place at a conspicuous place on the scaffolding during construction of the scaffoldings.
3. Scaffolders shall use full body harness while erecting scaffoldings.
4. Trained and qualified employees shall inspect scaffolding s, after construction and after any modification to the existing scaffolding. After inspections tag shall be signed and installed on the access ladder of the scaffoldings.
5. Only those scaffolding that have a signed inspection tag indicating that it is safe and fit to be used, shall be used.
6. Unnecessary items should not be kept on the scaffolding platform.

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7. Ladders should not be used from the top of the scaffolding platform.
8. Inspection tag shall be removed, if any modification is to be carried out on the scaffolding. Permission for the use of modified scaffolding shall only be given after re inspection and installation of a new tag.
9. All tube and coupler scaffoldings shall be constructed and erected to support four times the maximum intended load.
10. Post shall be accurately spaced, erected on suitable bases, and maintained plumb at all times.
11. Scaffoldings shall not be moved or altered horizontally while in use or occupied.
12. Members and accessories for scaffoldings shall be maintained in good condition. Any broken, bent, excessive rusted, altered or otherwise damaged frames or accessories shall not be used. Locking devices shall be maintained in good working condition.
13. Scaffoldings members should be constructed of metal materials of known strength characteristics and shall be capable of supporting at least four (4) times the maximum intended load.
14. Scaffoldings shall be properly braced by cross and/ or diagonal bracing to square and align vertical members so that erected scaffolding retains plump, square and maintains rigid alignments. Where the height or length of the scaffolding exceed 7.5 meters, the scaffoldings shall be securely tied to a structure at intervals not greater than 7.5 meters.
15. Employees shall not work on the scaffolding during storm or high winds.
16. Foundation for scaffolding shall meet the following requirements:
 - 16.1 All scaffoldings shall be erected on a firm foundation. Scaffolding can normally be built directly on concrete. Scaffoldings built on asphalt require base plate, plywood or a plank to spread the load. All scaffoldings built on shell or firm soil shall have pads or planking under a supporting legs.
 - 16.2 screw jacks shall be used to level scaffoldings. Make shift shims of block of wood, bricks, or concrete shall not be permitted.

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The maximum intended load without settlement or displacements.

16.4 where scaffoldings is erected on solid bearing such as rock or concrete, small timbers pads(not scaffoldings planks) should be use in place of sole plate to prevent the base plates striking off.

16.5 concrete block, barrels and other base or unsuitable materials shall not be used for the construction of support of scaffolding.

17. Structural members for scaffoldings shall meet the following requirements:

17.1 Ordinary scaffolding tubing should be 2.3 cm in diameter and is referred to as two-inch tubing. It should be of mild steel. Tubes shall be free from cracks and surface flaws, laminations, excessive rust and other defects. The end shall be cut square and clearly.

17.2 Standards shall be pitched on 15 cm x 15 cm steel base plate. All standards shall be vertical.

17.3 Runners shall be erected along the length of the scaffolding at even heights. Runners shall be interlocked to form continuous lengths and coupled to each post. Runners shall be place not more than 2 m on centre.

17.4 Bearers shall be installed transversely between posts and shall be securely coupled to the post bearing on the runner coupler.

17.5 Cross and longitudinal bracing shall be provided.

18. Guardrails and Toe-boards shall meet the following requirements:

18.1 Guardrails should be between 0.9-1.0 meter high from the working platform and a mid-rail installed between the guardrails and working platform.

18.2 Toe-board 2.5 cm x 10 cm lumber shall be installed at all open sides on all scaffolding more than 3 meters above the ground or floor. Toe-boards shall be a minimum of 10cm in height.

19. Ties shall meet the following requirements:

	SCAFFOLDING SAFETY PROCEDURE	HES 009
	<i>Document Title</i>	<i>Document No.:</i>

19.1 It is essential that all scaffoldings (with the exception of certain tower and mobile scaffoldings), be securely tied to the building or structures throughout their length to prevent movements of the scaffolding either toward or away from the building or structure.

This should be done by connecting a tie tube to either ledgers or standards and coupling to a tie or column box tie assembly. Tube should be securely wedged between opposing surfaces on the building or structure by the used of reveal pins, and coupled to the tie tubes. Two way ties or column box ties shall be evenly distributed over the scaffolding area. To ensure the security of reveal ties, it is necessary to check frequently for tightness.

19.2 Ties shall occur at least every 4 meters vertically. All tie assembled connections shall be made with 90 degree load bearing couplers.

19.3 The scaffoldings shall be tied up and securely braced against the building or structure horizontally and vertically.

20. Planking and decking shall meet the following requirements:

20.1 All planking shall be scaffolding grade as recognized by grading of species of wood use.

20.2 All planking or platform shall be overlapped minimum 0.3 meters or secured from movement.

20.3 An access ladder or equivalent safe access shall be provided.

20.4 Scaffolding planks shall extend over their end support not less than 15 cm. And more than 46 cm. Scaffolding planking shall be cleated at each end. Nails or bolts used for cleating shall be sufficient and adequate size to provide secure bonding of the cleat. Nails shall not be subjected to a straight pull and shall be driven full length.

20.5 Planks shall not be painted or treated in any way what would conceal defects.

20.6 Planks that are split, decayed or warped shall not be use, but the parts affected should be cut off to produce shorter planks with the ends banded or bolted through.

20.7 Scaffolding planks shall not be used for shuttering for concrete, shoring for trenching, or as sole plates for scaffolding.

20.8 All decking shall be minimum of 2 cm construction grade plywood, clean and free of obvious defects such as cracks, knotholes, etc., and uncontaminated with chemicals, paints, concrete or other substances that may weaken the plywood.

20.9 Plywood decking should be used to span an opening up to maximum width of 0.6 meters.

20.10 The decking shall be nailed in place. Shall be driven full length.

20.11 Decking shall be kept free of unnecessary obstructions, materials, and projecting nails.

20.12 Decking which has become slippery with oil or any other substance shall be sanded, cleaned, or otherwise treated as soon as possible.

	SCAFFOLDING SAFETY PROCEDURE	HES 009
	<i>Document Title</i>	<i>Document No.:</i>

21. Access ladders shall meet the following requirements:

21.1 All scaffolding shall be equipped with access ladders of sufficient strength to meet the requirements.

21.2 Ladders shall be structurally sound with no sharp, burrs, etc. Aluminum ladders should not be used.

21.3. Access ladders shall not exceed 6 meters in length in minimum width between side rails 0.3 meters. Rungs shall be parallel and level when in position for use.

21.4 Rungs shall be able to withstand a working load of 200 pounds.

21.5 Ladders shall not be used for bracing, skid, guy pole or any use other than for which intended.

21.6 Access ladders shall be maintained in good condition at all times and inspected prior to each use. Ladders shall be kept clean of oil and grease. Ladders with bent rungs or side rails or excessive deflection shall be taken out of service.

22. Mobile scaffoldings shall meet the following requirements:

22.1 Tower scaffoldings shall be fitted with casters with enter locking mechanism to facilitate mobility. They shall be used on hard level surfaces and not on sand or gravel.

22.2 Castors are always locked when the scaffolding is in use. Wheels or casters, fitted with brakes which cannot be release accidentally, shall be securely fixed to the base of the standards.

22.3 No person, tools, or equipment should remain on the scaffolding when it is being moved.

23. Suspended scaffolding shall meet the following requirements:

23.1 Suspended scaffoldings are allowed to be hung from steel structural work.

23.2 Normal rules of planking and handrails apply and scaffolding must be secured against movement.

24. All scaffoldings shall be inspected regularly and after weather likely to have affected stability. Main points to be checked are as follows:

	SCAFFOLDING SAFETY PROCEDURE	HES 009
	<i>Document Title</i>	<i>Document No.:</i>

- 24.1 Standards pitched on base plates and adequate timbers sole plates. Correctly aligned and not damaged or displaced.
 - 24.2 No undue deflection of ledgers.
 - 24.3 Adequate and effective ties and braces.
 - 24.4 Correct types of couplers in use and properly tightened.
 - 24.5 Sound closely laid and properly supported planks.
 - 24.6 Guardrails and toe boards shall be installed for work at feet high or more, to prevent falling of materials/ personnel.
 - 24.7 Ladders in good condition properly supported and secured.
 - 24.8 Traces of chemical deposit or obvious deformities on all metal part, periodic examination of cracks or unused discoloration.
-
- 25. Personnel responsible for the erection/ inspections of scaffoldings shall be adequately trained in the safe works practices relating to the installation of the scaffolding.
 - 26. Personnel who use scaffoldings shall be trained to recognize obvious defects such as missing access ladders or handrails, damaged or loose planking, incorrect overlap of boards, or changes in foundation support.

6. RESPONSIBILITIES

1. Employees/ Scaffold Craftsmen shall be responsible to:
 - Be familiar with this procedure
 - Ensure that scaffold components manufactured by different
 - Attend all required and relevant training
 - Use personal protective equipment in accordance training received
2. Scaffold supervisor/ Project Supervisor/ Area Supervisors shall be responsible to:
 - Ensure that all necessary training is acquired by scaffolds builders and scaffold users
 - Ensure that personnel in his charge are familiar with this procedure and that all safe working practices are adhered to
 - Ensure that all known hazards or potential danger areas are identified and necessary precautions have been taken
 - Ensure that all scaffold work is performed by persons trained to perform such work.
3. Supervisor shall be responsible to:
 - Ensure that all necessary training is required by scaffolds builders and scaffold users
 - Ensure that personnel in charge are familiar with procedure and that all safe working practices are adhered to.
 - Ensure that all known hazards or potential danger areas are identified and necessary precautions have been taken.
 - Ensure that all scaffold work is performed by persons trained to perform such work.
4. **Safety department / Safety Officers shall be responsible to:**
 - Ensure that all provisions of this procedure are kept updated according the latest industry requirements.
 - Ensure that personnel use appropriate personal protective equipment.
5. **Project Manager shall be responsible to:**

	SCAFFOLDING SAFETY PROCEDURE	HES 009
	<i>Document Title</i>	<i>Document No.:</i>

- Ensure that all employees comply with all the provisions of this procedure
- Ensure the provision of all the needed resources in the implementation of this procedure.

7. EMPLOYEES TRAINING

F.1 Classroom and visual presentation are the method use to share the information.

F.2 Assessment is given at the end of the presentation to ensure that employee fully understands with ELITE Scaffolding Safety standard.

F.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

F.4 Annual training/refresher will be conducted and evaluated to maintain employee's knowledge and awareness with regards to ELITE Scaffolding and Safety standard.

F.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Scaffolding and Safety standard presentation.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	SECURITY PROCEDURE	HES 010
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

Its primary purpose is to effectively maintain safety and security of ELITE workers, contractors and visitors inside the ELITE constructions yard. Similarly, this security procedure is developed and established for the control of vehicle/equipment entering or leaving the ELITE yard and preventing loss/damage of company properties and equipment.

3. SCOPE

This procedure is applicable to ELITE constructions SL yard and camp located beside EG LNG Business Campus and Caribe respectively.

4. RESPONSIBILITY

4.1. **General Manager** is the responsible for ensuring that the Security Procedure is implemented in ELITE construction yard and Caribe camp. He shall review this procedure annually.

4.2. **HSE Department Head** is responsible for the detailed application of the procedure. He shall monitor and performs audits to help improve this security procedures.

4.3 **ALL Employees/Contractor** shall;

4.3.1. Follow the program requirements outlined in this policy and standard procedures.

4.3.2. Attend Security procedure orientation.

4.3.3. Report all incident that they witness or incur with regards to security procedure. This will help the ELITE CONSTRUCCIONES SL to improve safe practices.

4.4. **Security officer** is responsible for the security of on-site and off-site facilities. Ensure the safety and protection of all personnel and properties. He shall report all incident or accident that he witness or incur with regards to security procedure to the HSE Department head immediately.

5. SECURITY CONTROL MEASURES

5.1 Perimeter Fencing and Gates

	SECURITY PROCEDURE	HES 010
	<i>Document Title</i>	<i>Document No.:</i>

The ELITE construction yard and camp facilities perimeter will be enclosed with fencing and access / egress gates. Gates will be constructed of metal and have a capability of being securely locked. All gates be locked during the hours of no work.

5.2 ID Badges / Identification

All ELITE personnel shall wear their badges all the times when on the Punta Europa Complex for their proper identification.

5.3 Visitor's admission to the ELITE yard will require permission to enter through the security and requiring them to record their name, signature and purpose in the log book.

5.4 All vehicles and equipment entering the ELITE yard and plant complex must have proper vehicle pass required by the security.

5.5 All visitor's vehicle will be issued temporary pass. Temporary pass can be obtained at the security gates.

5.6 All vehicles and equipment entering Punta Europa Complex on behalf of ELITE Construcciones SL will be inspected in the ELITE Construcciones yard before entering the Punta Europa to ensure they are ELITE / Punta Europa compliance.

5.7 Searches of Person and/or Property

Security will conduct random searches of vehicles, property and personal carry items of personnel and visitors as they enter or leaving the ELITE yard. Bags shall be presented for inspection to the security guards on duty at the gates.

5.8 Log-in and Log-out

Security will keep log-in and log-out time for all visitors entering and leaving the yard.

5.9 Material Control

All tools and materials, which are removed from the yard, must be accompanied by an ELITE gate pass with authorized signatories.

5.10 Liquor, Drugs, Firearms and Explosives

Any person under the influence and/or possession of any intoxicating liquor or illegal substances will not be permitted to enter the ELITE Construcciones SL yard.

Firearms, alcoholic beverages, narcotics or explosives will not be permitted on the yard.

5.11 Emergency Evacuation

In the event of requiring an evacuation, the Security officer will personally ensure that the

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Main access / egress gates are not obstructed and will assist regulating the traffic to allow all personnel to exit the yard.

6. EMPLOYEES TRAINING

6.1 Classroom and visual presentation are the method use to share the information.

6.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Security procedure.


6.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass in the first assessment, a second chance is given to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

6.4 Annual training/refresher will be conducted and evaluated to maintain employee's knowledge and awareness with regards to ELITE Security procedure.




6.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Security procedure presentation.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.


	INDUSTRIAL HYGIENE	HES 011
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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	INDUSTRIAL HYGIENE	HES 011
	<i>Document Title</i>	<i>Document No.:</i>

2. INTRODUCTION

The discipline of industrial hygiene is concerned with identifying and controlling potential chemical, physical and biological workplace hazards by evaluating practices, strategies and project techniques using the following steps:

1. Anticipation
2. Recognition
3. Evaluation
4. Control

The different work environment at ELITE CONSTRUCTUCCIONES SL, and of each employee, may involve various potentials hazards, including exposure to hazardous materials and other elements, such as noise and radiation. If over exposed to such agents, personnel may suffer acute or chronic health problems. Exposures are kept to a minimum through the use of materials substitution; proper use, handling and storage, adequate ventilation and personal protective equipment; training; and periodic monitoring.

3. PURPOSE


This program is intended to help ensure the health and safety of our employees, those of our sub contactors, and those of the host sites we work at. Additionally this program will assist us in meeting the host sites commitment to safety and health and in meeting regulatory requirements.

4. SCOPE

This program covers all operation and workplaces at ELITE CONSTRUCCIONES SL, where employees are exposed to hazardous materials, carcinogens, noise, inadequate lighting, heat and cold stress, and non-ionizing radiation (such as ultraviolet, visible, infrared, radiofrequency, microwave, laser and static fields).

5. DEFINITIONS

1. **A CUTE-** severe often dangerous effect used to denote an excessive exposure to an agents for short duration
2. **BIOLOGICAL HAZARDS-** hazards from biological agents such as viruses, bacteria, spores, fungi, blood-boned pathogens.

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3. **CACINOGEN**- a material that cause the developments of cancerous growth in living tissue.
4. **CHEMICAL HAZARDS**- hazards from the materials such as acids, bases, solvents, cryogens, etc.
5. **CHRONIC**- an adverse effects that develops slowly over a long period of time that recurs frequently.
6. **INDUSTRIAL HYGIEN**- the science devoted to the anticipation, recognition, evaluations, prevention and control of those occupational factors or stresses arising in or from the workplace which may cause sickness, impaired health and well-being, or significant discomfort among workers
7. **INDUSTRIAL HYGIENE SURVEY**- workplace survey for hazardous an contaminants
8. **OCCUPATIONAL EXPOSURE LIMIT (OEL)**- An exposure limit defined by the Company that is derived and is lower of the OSHA Permissible Exposure Limit or ACGIH Threshold Limit Value, or other sources of exposure criteria develop for the purpose of protecting the health and of the workers.
9. **PERMISSIBLE EXPOSURE LIMIT (PEL)** - an exposure limit published by the Occupational Safety and Health Administration (OSHA) and is internationally enforced as a legal standard. PEL may be either a Time-Weighted –Average (TWA) exposure limit (eight hour), a 15minutes short term exposure limit (STEL), or a Ceiling (C)
10. **PHYSICAL HAZARD**- hazards from physical agents such as noise , non-ionizing radiation, and magnetic fields
11. **STRESSOR**- any chemical, physical, ergonomic, biological, or nuclear hazards in the work area that may present a potential exposure to employees.
12. **THRESHOLD LIMIT VALUE (TLV)** - recommended guidelines for occupational exposure to airborne contaminants published by the American Conference of Governmental Industrial Hygienist (ACGIH). TLVs represent the average concentration for an eight-hour workday and a 40 hour work week to which nearly all workers may be repeatedly exposed without adverse effect.

6. PROGRAM REQUIREMENTS

6.1 GENERAL

Successful implementations of the Industrial Hygiene (IH) program support a safe and healthy work environment by:

- Anticipating, recognizing and evaluating potentials workplace hazards before they exist (for example during the development and review of job safety analyses)
- Implementing recommended engineering controls where feasible
- Implementing administrative controls when engineering controls are not feasible
- Surveying work areas to identify hazards (such as toxic agents, ventilation problems and noise) and taking appropriate measures to reduce them
- Training personnel to recognized hazards and to take appropriate safety measures when working under potentially hazardous conditions
- Choosing appropriate personal protective equipment (PPE)

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The industrial hygiene program is coordinated by the HES Department, and is also available to evaluate and assist in the design of ventilation systems, work practices, hazards analyses (JSA) and PPE selection and usage.

6.2 HAZARDS RECOGNITION

1.1 The industrial hygiene program addresses chemical physical and biological hazards. The programs consist of identifying and properly evaluating hazards, then providing recommendation to reduce the potential for exposure and improve health in the workplace.

1.2 Hazards Recognition Guidelines.

Proper implementation of the industrial hygiene program protects personnel from chemical, physical and biological hazards. An initial step in the program is recognition of the different types of hazards:

1.2.1 Chemical Hazards

Chemical hazards exist when there is the risk of direct skin contact, inhalation, accidental ingestion, or absorption of hazardous chemical in the form of liquids, solids, vapours, gases, fumes, or mists. In general, the degree of risk associated with handling a specific chemical depends on the toxicity of the chemical and the magnitude and duration of the exposure.

1.2.2 PHYSICAL HAZARDS


Physical hazards monitored by the HES Department or Safety Officers should include excessive level of noise and vibration, pressure, temperature extremes, oxygen deficiency, and non- ionizing radiation (including ultraviolet, visible, infrared, radio frequency, microwave, laser, static magnetic fields).

1.2.3 BIOLOGICAL HAZARDS

Biological hazards incuse any virus, bacteria, fungus, protozoan, insects, or other living organism that can cause a disease in healthy humans, or danger to the environment. These materials include such agents as blood borne pathogens. Biological hazards may exist as part of the total environment (for example in air or water), or they may be associated with specific project or industrial operations.

HES DEPARTMENT AND THE SAFETY OFFICERS IDENTIFY HAZARDS BY:

- Maintain familiarity with the activities and operation of the company
- Reviewing Job Safety Analysis (JSA) documents as needed to identify activities or operation requiring industrial hygiene consideration
- Observing employees activities9 such as chemical handling, procedural steps)
- Collecting information on physical, chemical and biological hazards
- Conducting personnel and work area monitoring

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6.3 EXPOSURE ASSESSMENT

ELITE CONSTRUCCIONES SL is committed to controlling exposures to chemical and physical hazards within recommended and established exposure guidelines or consensus standards, through the development and implementation of an exposure assessment plan.

The HES Department and safety officer uses pre-established and approved method and basis to monitor workers potentials exposures to chemical and physical hazards. The exposure assessment plan applies to all activities and operations (including designed, construction, maintenance, decontamination and environmental restoration activities) perform by ELITE CONSTRUCCIONES SL personnel.

The HES Department and any safety officer m will consider the following parameters during industrial hygiene survey:

- Type of hazards (chemical , physical, biological)
- Toxicity
- Quantity in use
- Duration of use
- Established occupational exposures model
- Employee input(such as complaints or the presence of odour
- Professional judgment and experience

6.4 CONTROL

1.3 Control involved the reduction of environment stressors to that the workers can tolerate without detriment to health and productivity. Control for work hazards fall into three major categories, which are open combined for more effective hazards reductions.

1.4 Upon thorough assessment, the following list of control measures to will be use, in the order of most effective to the least effective:

1.4.1 ENGINEERING COTROLS


Engineering controls involve the removal of the contain or hazards

Engineering control should be considered first when attempting to limit or reduce exposures. The engineering control includes:

- **SUBSTITUTION**

Substitution may occur in various ways: less hazardous materials may be used in a specific activity: another piece of equipment may be employed: a different system may yield the same result while using less hazards components. Review the substitution carefully ensuring that the resolution does not bring additional hazards

- **ENCLOSURE**

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Enclosure involved the segregation of hazardous process to minimize workers contact. Enclosed often reduces the necessity for additional control procedures.

- **VENTILATION**

Effective ventilation will minimize dispersion of airborne contaminants. Ventilation may also be used to controls odours, temperature or humidity.

4.2.2 ADMINISTRATIVE CONTROLS

In general, administrative controls reduce exposure by re-scheduling or rearranging work flow in exposures areas. Administrative controls include:

- **JOB ROTATION**

In certain situations, job rotation will removed employees form hazardous environment and thereby reduce exposures. For example job rotation can be used effectively in environments where heats stress is concerned.

But will also in an increase in the number of employees exposed.

- **EMPLOYEE TRAINING EDUCATION**

In an on-going employee training is an effective tool in reducing employee exposed to hazards. All administrative controls, especially training and education, require constant employee implementations for success.

- **WORK PRACTICES**

The use wet applications to reduce dust exposed, stringent personal hygiene practices, documented waste disposal procedures.

1.4.2 PERSONAL PROTECTIVE EQUIPMENT

Employees wear personal protective equipment (PPE) to protect themselves from hazards environments or conditions. PPE is used when administrative or engineering controls are either not possible or are not satisfactory.


7. RESPONSIBILITIES

1. EMPLOYEE

- 1.1 Complete required training in hazardous materials usage before working with them.
- 1.2 Refrain from consuming food and beverages in any area where chemical are used.
- 1.3 Use personal protective equipment provided.
- 1.4 Report usual odours or suspected exposures to supervisors and the HES Department
- 1.5 Report to the supervisor any changing conditions which may impact personnel noise exposure.

2. SUPERVISORS

- 2.1 UNDERSTAND POTENTIAL HAZARDS OF THE WORK BEING DONE AND IN THE WORKRD

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- 2.2 EVALUATE THESE POTENTIAL HAZARDS AS PART OF A PRE-JOB SAFETY REVIEW
- 2.3 REQUEST ASSISTANCE FROM SAFETY PERSONNEL AS NEEDED IN EVALUATING CONDITIONS AND OBTAINING INDUSTRIAL HYGIENE SURVEY
- 2.4 FOLLOW UP ON RECOMMENDATION PROVIDED BY THE HES DEPARTMENT
- 2.5 Ensure workers are aware the potential hazards and the controls in place to minimize potential exposures
- 2.6 Ensure all chemical and carcinogens are used have the proper warning sign displayed in consultation with the HES Department
- 2.7 Choose less hazards or non- carcinogenic materials whenever possible, in consultation with the HES Department

3. HES(SAFETY DEPARTMENT,SAFETY OFFICERS

- 3.1 Perform or oversee industrial hygiene surveys
- 3.2 Review associated JSA during industrial hygiene survey and provide corrective feedback as needed
- 3.3 Notify supervisor and personnel of monitoring results
- 3.4 Recommend warning signs where appropriate
- 3.5 Provide or coordinate hazards specific training for personnel who work with hazardous materials or carcinogens

4. PROJECT MANAGER

- 4.1 IMPLEMENT THE REQUIREMENT OF THIS PROGRAM
- 4.2 ENFORCE ALL PROVISION
- 4.3 PROVIDE THE RESOURCES NEEDED IN THE IMPLEMENTATION OF THIS PROGRAM

8. EMPLOYEES TRAINING


F.1 Classroom and visual presentation are the method use to share the information.

F.2 Assessment is given at the end of the presentation to ensure that employee fully understands with ELITE Industrial Hygiene standard.

F.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

F.4 Annual training/refresher will be conducted and evaluated to maintain employee’s knowledge and awareness with regards to ELITE Industrial Hygiene standard.

F.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Industrial Hygiene standard presentation.

	INDUSTRIAL HYGIENE	HES 011
	<i>Document Title</i>	<i>Document No.:</i>

9. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	EMERGENCY NOTIFICATION PLAN	HES 012
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this plan is to disseminate the procedure to all personnel to maintain and secure the workplace safety.

3. SCOPE

This program applies to ELITE CONTRUCCIONES SL yard (CAPEX yard) located beside EG LNG Business campus and illustrates the basic actions to be taken during emergency calls or situations.

4. PROCEDURE

- 4.1. In the event of an emergency, the siren will sound. All personnel shall stop all activities and proceed to muster point.
- 4.2. ELITE CONSTRUCCIONES SL. will notify the Punta Europa Fire, Safety and Security Department in case of any emergency which occurs in the yard.
- 4.3. The Supervisor / HSE personnel present in the event of emergency will respond immediately and facilitate clearing people out of the dangerous area.
- 4.4. Upon receiving instruction to assemble, all personnel will ensure their work area and walk in calm, orderly manner to the assembly/ muster area.
- 4.5. The Supervisor will do a roll call at this point to check for missing personnel.
- 4.6. The Supervisor will then take head count of their personnel in the assembly area/ muster point. If any person found to be missing, the HSE personnel will immediately inform the project Manager.
- 4.7. The Emergency Respond Team will immediately respond, attempt to control the danger situation and help facilitate evacuation if needed.
- 4.8. No Attempt will be made to locate the reported missing person until;
 - 4.8.1. A search has been authorized by the Project Manager.
 - 4.8.2. It is determined that search and rescue party can be reasonably protected during such a search.
- 4.9. The Project Manager will call the emergency situation off only when it is positively determined that the dangers exist and only then may employees to their normal duties.

5. RESPONSIBILITIES

- 5.1. The Project Manager is the overall responsible for ensuring that the Emergency Notification Procedure is implemented on ELITE CONTRUCCIONES SL. Yard.

	EMERGENCY NOTIFICATION PLAN	HES 012
	<i>Document Title</i>	<i>Document No.:</i>

- 5.2. The HSE Department Head is responsible for the details application of the procedure. He shall monitor and perform audits.
- 5.3. All ELITE CONSTRUCCIONES SL. Personnel shall be aware of and shall observe the provision of this procedure.
- 5.4. ELITE CONSTRUCCIONES SL. Shall implements action ensuring that the emergency procedure are properly followed and managed in the yard.

6. EMPLOYEES TRAINING



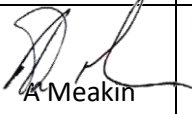
- 6.1 Classroom and visual presentation are the method use to share the information.
- 6.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Emergency Notification procedure.
- 6.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.
- 6.4 Annual training/refresher will be conducted and evaluated to maintain employee’s knowledge and awareness with regards to ELITE Emergency Notification procedure.
- 6.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Emergency Notification procedure presentation.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	WASTE MANAGEMENT STANDARD	HES 013
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	24 Apr 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
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	WASTE MANAGEMENT STANDARD	HES 013
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The **ELLITE CONSTRUCCIONES S.L.** Environmental & Construction Waste Management System is a structured framework for managing an organization's significant environmental impacts. This also includes management of waste, emissions, energy use, transport and consumption of materials. Adopting this standard can help an organization to:

- Manage and improve its environmental performance (managing negative impacts) and helping to increase resource efficiency (e.g. cutting waste and energy use);
- Comply with environmental laws and regulations;
- Generate financial savings through well-managed use of resources and efficient practices;
- Improve its standing and reputation with staff, client companies, partner organizations and wider stakeholders; and
- Adapt to a changing environment (its operations or its products/ services).

3. SCOPE

- 3.1 ENVIRONMENTAL AWARENESS**
- 3.2 SOLID & LIQUID WASTE MANAGEMENT**
- 3.3 WATER POLLUTION AND CONTROL**
- 3.4 SPILL PREVENTION / RESPONSE**
- 3.5 AIR EMISSION AND DUST CONTROL**
- 3.6 NOISE POLLUTION**

4. NORMATIVE REFERENCES

ELITE CONSTRUCCIONES SL Environmental & Construction Waste Management System is established based on the following national laws & regulation and International standards:

3.1 National Laws and Regulation

- 3.1.1** Law Regulating the Environment in the Republic of Equatorial Guinea (Law 7/2003)
- 3.1.2** Hydrocarbon Law of the Republic of Equatorial Guinea (Law8/2006)

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3.1.3 Decree Regulating Environmental Inspections in the Republic of Equatorial Guinea (Decree 173/2005)

3.1.4 Water & Coast Law of the Republic of Equatorial Guinea (Law3/2007)

3.2 International Standards

3.2.1 ISO 14001 – Environmental Management Standard

3.2.2 ISO 14004 – Guidelines on Principles, Systems and Support Techniques

3.2.3 ISO 14063 – Environmental Communication

3.2.4 Convention on Biological Diversity (CBD), 1992

3.2.5 World Health Organizations

3.2.6 Basel Convention (Tran boundary movements of hazardous wastes and their disposal.)

5. RESPONSIBILITIES AND ACCOUNTABILITY

4.1 Employees shall be responsible to:

- To observe and practice the environmental standards and policy.
- To report any environmental incidents to their immediate supervisors by the most direct means available.

4.2 Contractors shall be responsible to:

- Observe and practice the standards and policy.
- Notify the ELITE CONSTRUCCIONES SL supervisor in-charge of the environmental incident.
- initiate investigation and complete their personal report.
- provide all the information required to complete investigation, reporting and recording.

4.3 Supervisors shall be responsible to:

- Ensure that the standards and procedure are implemented.
- Respond the environmental incident as soon as they are aware of the event.

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- Notify the Manager and HSE Department.

4.4 HSE Representatives shall be responsible to:

- Assist supervisors on completion of the investigation and reporting of the incident.
- Maintain records of the environmental incident and update the Safety Statistics Board
- Prepare a status report of corrective action items for management review
- Coordinates follow-ups on corrective actions.
- Coordinate and report on the monitoring and reporting of waste.

4.5 General Manager shall be responsible to:

- ensure that all employees comply with all the provisions of this procedure.
- Ensure the provision of all the needed resources in the implantation of this procedure.
- Review personally each incident and take all steps necessary to prevent future recurrences

6. PROCEDURE

5.1 ENVIRONMENTAL AWARENESS

5.1.1 Environmental awareness constitutes a major part of achieving compliance for environment protection. Environmental Awareness Orientation shall be given to all employees as part of their Safety Orientation.

5.1.2 Environmental related toolbox talks / meetings shall be conducted on routine basis.

5.2 SOLID & LIQUID MANAGEMENT

5.2.1 ELITE CONSTRUCCIONES SL objective for solid & liquid management is to reduce volume reduction, component separation and resource recovery wherever practicable. When considering means of reducing waste, the “waste hierarchy” concept set out in the management waste strategy is a useful tool. The hierarchy is used to define the better technique when trying to mitigate a waste stream, with reduction at source at the top, and external disposal at the bottom.

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Hierarchy	Method	Description
1	Reduction	Avoidance of the production of waste
2	Re – Use	Using products or Materials again without their reprocessing.
3	Recycling	Reprocessing of waste materials to produce a usable material product
4	Disposal	External disposal to designated and approved disposal areas

5.2.2 Storage, all waste prior to disposal should be held in secure and designated areas. Hazardous waste should be clearly labelled and held in bonded areas to prevent escape when appropriate. The management established procedure to segregate construction waste, Please see below Table 5.2.2 Solid Waste Segregation:

Table 5.2.2 Solid Waste Segregation

Paper, and Woods	Green Bin
Metal, Plastic & Glass (e.g. Rebar, steel, Welding rods, grinding disc, uncontaminated plastic and metal containers, busted fluorescent lamps)	Blue Bin
Oil contaminated materials, filters, spill kits	Yellow Bin
Use Oil / Oil spills	Black Bin

5.2.3 Disposal Method

5.2.3.1 General waste like paper and wood are collected and dispose for solid waste incineration.

5.2.3.2 Metal, Plastic & Glass (e.g. Rebar, steel, Welding rods, grinding disc, uncontaminated plastic and metal containers, broken fluorescent lamps) are collected and dispose to Government designated landfill areas.

5.2.3.3 Batteries (Cars, Track and equipment) are returned to supplier for trading in when purchasing new batteries.

5.2.3.4 Oil contaminated materials, filters; spill kits are considered hazardous waste. ELITE CONSTRUCTION SL at present does not have resources to handle hazardous waste. However, management is closely coordinating with MEGPL HES Department and/or EGLNG HSE Department to properly dispose the waste in compliance with their standard and procedure. When the liquid spilled and absorbed is light-to-medium

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grade hydrocarbons, small quantities of used absorbent material—less than 0.1 m³, or 100 kg—may be disposed of as solid waste at a waste depot.

5.2.3.5 Used oil / oil spills are collected and delivered to local construction company who are using used oils for their asphalt works.

5.3 WASTE WATER DISCHARGE

5.3.1 Wastewater discharge standards of ELITE CONSTRUCCIONES SL are made to protect water sources and maintain the quality and quantity of them. Though, no significant volume of waste water produce the management is still observing local and international wastewater regulations. All domestic wastewater are disposed via a specialist domestic waste services contractor.

5.3.2 During the course of construction silt fences will be erected to stop building materials contaminating water courses.

5.4 SPILL PREVENTION / RESPONSE

5.4.1 ELITE CONSTRUCCIONES SL shall identify possible source of spill to prevent and avoid oil spill incident to occur. Management to ensure heavy and industrial equipment are regularly checked and inspected that is free from oil spill.

5.4.2 Management to ensure that oil and gas filling stations are designed to contain spills. In the event of an oil spill, supervisor or project in charge shall notify HSE department and the Manager. Supervisor or Project in charge to respond, mitigate and prevent further soil contamination using approved oil spill kits.

5.4.3 Oil spill incident must be investigated and documented. Management will track the incident and review personally. Management recommend counter measures to prevent incident to recurrence. The Incidents log time, date, location, chemical nature.

5.5 AIR EMISSION AND DUST CONTROL

ELITE CONSTRUCCIONES SL gas and dust emission impact to environment is minimal but the management commits to comply the standard and allowable/acceptable gas emission with air. Management promote an ambient air quality that is safe and acceptable to people. In fulfillment of this commitment, management shall identify sources of emission, established procedure, track and review standards.

5.5 AIR EMISSION AND DUST CONTROL (cont'd)

5.5.1 AIR EMISSION

5.5.1.1 Identify Air Emission Sources

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ELITE CONSTRUCCIONES major point source of emissions is produced from company generators and mobile sources includes heavy equipment, vehicles, air compressor machines and power tools.

5.5.1.2 Procedure

5.5.1.2.1 ELITE CONSTRUCCIONES SL. shall save energy; saving energy can reduce carbon emissions. Most energy sources require burning fossil fuels, the less energy we use, the greener we are.

5.5.1.2.1 ELITE CONSTRUCCIONES SL shall improve fuel economy, all equipment’s and vehicles shall be maintained and checked regularly to keep or increase fuel efficiency. According to EPA, a one percent increase in fuel economy equals a one percent decrease in carbon dioxide emission.

5.5.1.2.3 ELITE CONSTRUCCIONES SL equipment or vehicle found to be non-conformity to national and international regulation for emission standards shall be repaired or if for economy reasons this equipment/vehicle be dispose and purchased replacement.

5.5.1.3 Communication

All equipment or vehicle found to be non-conformity to national and international regulation for emission standards shall be reported and recorded by the HSE Department. Safety management shall monitor, track and close-out the event. Project Manager to review and recommend necessary methods to prevent further harm to environment.

5.5 AIR EMISSION AND DUST CONTROL (cont’d)

5.5.2 DUST CONTROL

5.5.2.1 To minimize the impact from dust all excavation, stockpiles, access roads, waste areas, and other work areas shall be maintained to prevent dust that would cause hazard to others.

5.5.2.2 Dust and sand emission in populated areas will be kept to minimum methods.

5.5.2.3 During periods of dry weather, all reasonable methods shall be taken to prevent inconvenience to the residents, pedestrians, and road users due to blown dust or sand from the projects.

5.6 NOISE POLLUTION

5.6.1 Noise pollution defines for the purpose of this standard is the potential disturbance of environmental by noise and potential damage to occupational and environmental health.

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5.6.2 Noise levels within construction area will be assessed and control.

5.6.3 At level 85 db (A), hearing protection will be provided and worn.

5.6.4 ALL ELITE CONSTRUCCIONES SL personnel entering the noise area, where noise levels exceed acceptable limits such as construction site and workshop, shall wear suitable hearing protection and use it as required.

5.6.5 ELITE CONSTRUCCIONES SL personnel shall minimize the exposure time to high levels of noise as necessary.




5.6.6 "HEARING PROTECTION REQUIRED" sign shall be posted at high noise level areas.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	RISK MANAGEMENT PLAN	HES 014
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	10 Oct 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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	RISK MANAGEMENT PLAN	HES 014
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2. PURPOSE

The **ELITE CONSTRUCCIONES SL (EC S.L)** Risk Management plan documents the processes and procedures that will be used to manage and control those events that could have a negative impact on the EC S.L project. It's the controlling document for managing and controlling all project risk. This plan will address:

- Risk identification
- Risk assessment
- Risk Mitigation
- Risk Contingency planning; and
- Risk Tracking and Reporting.

3. RISK MANAGEMENT STRATEGY

3.1 Risk Identification

Risk is the chance or probability that a person will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss. Risks can be identified from a number of different sources. Some may be quite obvious and will be identified prior to project "kick-off". Others will be identified during the project lifecycle, and a risk can be identified by anyone associated with the project. Some risk will be inherent to the project itself, while others will be the result of external influences that are completely outside the control of the project team.

Throughout all phases of the project, a specific topic of discussion will be risk identification. The intent is to instruct the project team in the need for risk awareness, identification, documentation and communication.

Risk awareness requires that all workers/employees be aware of what constitutes a risk to the project, and being sensitive to specific events or factors that could potentially impact the project in a positive or negative way.

3.2 Risk Responsibilities

The responsibility for managing risk is shared amongst all the stakeholders of the project. However, decision authority for selecting whether to proceed with mitigation strategies and implement contingency actions, especially those that have an associated cost or resource requirement rest with the ELITE CONSTRUCCIONES S.L. The following tables details specific responsibilities for the different aspects of risk management.

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Risk Activity	Responsibility
Risk Identification	ALL workers/ employees
Risk Registry	HSE Department
Risk Assessment	Contracts Administrator / HSE Representatives
Risk Statements	Project Manager
Risk Response Option Identification	ALL workers / employees
Risk response Approval	Project Manager
Risk Contingency Planning	HSE Department / Project Manager
Risk response Management	Project Manager
Risk reporting	HSE Department

3.3 Risk Assessment

Risk assessment is the act of determining the probability that a risk will occur and the impact that event would have, should it occur. This is basically a “cause and effect” analysis. The “cause” is the event that might occur, while the “effect” is the potential risk/impact to a person/project, should the event occur.

Assessment of a risk involves two factors. First is the likelihood which is the measure of certainty that an event or risk will occur. This can be measured in a number of ways, but for the ELITE CONSTRUCCIONES S.L. will be assigned a probability percentage for 1% to 100%. A risk with no probability of occurring will obviously pose no threat, while a risk of 100% means the risk event has occurred.

The second factor is estimate of the consequences of the risk/damage to the person or property. This can be a somewhat subjective assessment, but should be quantified whenever possible. The occupational health risk, environmental problem/pollution, damage to property or equipment is in most cases factors that can be estimated and documented in the risk statement. Guidelines are listed below:

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RISK MATRIX		CONSEQUENCES				
		Insignificant (1)	Minor (2)	Moderate (3)	Critical (4)	Catastrophic (5)
LIKELIHOOD	Almost Certain (5)	5	10	15	20	25
	Likely (4)	4	8	12	16	20
	Possible (3)	3	6	9	12	15
	Unlikely (2)	2	4	6	8	10
	Rare (1)	1	2	3	4	5

Legend:

Likelihood:

- 1 – Rare (Exceptional Circumstances only), 1 -19%
- 2 – Unlikely (Not expected to occur), 20 – 39%
- 3 – Possible (Could occur at some time), 40 – 59%
- 4 – Likely (Will probably occur in most circumstances), 60 – 79%
- 5 – Almost Certain (Expected to occur in most circumstances), 80% - 99 %

Consequences:

- 1 – Insignificant (No significant risk of injury)
- 2 – Minor (Potential for Minor injury)
- 3 – Moderate (Potential for moderate injury)
- 4 – Critical (Potential for severe injury)
- 5 – Catastrophic (Likely to result in death)

Rating Risk Level / Response:

- Score 1 – 3, Low Risk (Manage by routine procedures)
- Score 4 – 6, Moderate risk (Specify management responsibility)
- Score 8 – 12, High risk (Needs senior management attention)
- Score 15 – 25, Extreme risk (Detailed action/plan required)

The Risk Assessment for the Contracts Services should be jointly identified and analyzed by representatives from ELITE Construcciones Management, Client Representatives and EHS Representative. The Risk Assessment should be conducted in accordance with the Client JSA Program to identify the tasks required to complete an activity, assess the hazards associated with each task, and implement controls or actions to eliminate or minimize the identified risks.

The results of the risk assessment process are documented in each Risk Statement and summarized in the Risk Register which will be reported on a monthly basis.

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3.6 Risk Mitigation

Risk mitigation involves two steps:

- Identifying the various activities, or steps, to reduce the probability and/or

Impact of an adverse risk.

- Creation of a Contingency Plan to deal with the risk should it occur.

Taking early steps to reduce the probability of an adverse risk occurring may be more effective and less costly than repairing the damage after a risk has occurred. However, some risk mitigation options may simply be too costly in time or money to consider.

Mitigation activities should be documented in the Risk Register, and reviewed on a regular basis. They include:

- Identification of potential failure points for each risk mitigation solution.
- For each failure point, document the event that would raise a “flag” indicating that the event or factor has occurred or reached a critical condition.
- For each failure point, provide alternatives for correcting the failure

3.7 Risk Contingency Planning

Contingency planning is the act of preparing a plan, or a series of activities, should an adverse risk occur. Having a contingency plan in place forces the project team to think in advance as to a course of action if a risk event takes place.

- Identify the contingency plan tasks (or steps) that can be performed to implement the mitigation strategy.
- Identify the necessary resources such as money, equipment and labor.
- Develop a contingency plan schedule. Since the date the plan will be implemented is unknown, this schedule will be in the format of day 1, day 2, day 3, etc., rather than containing specific start and end dates.
- Define emergency notification and escalation procedures, if appropriate.
- Develop contingency plan training materials, if appropriate.
- Review and update contingency plans if necessary.
- Publish the plan(s) and distribute the plan(s) to management and those directly

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involved in executing the plan(s).

Contingency may also be reflected in the project budget, as a line item to cover unexpected expenses. The amount to budget for contingency may be limited to just the high probability risks. This is normally determined by estimating the cost if a risk occurs, and multiplying it by the probability.

Associated with a contingency plan, are starting triggers and stop triggers. A start trigger is an event that would activate the contingency plan, while a stop trigger is the criteria to resume normal operations. Both should be identified in the Risk Register.

3.8 Tracking and Reporting

As project activities are conducted and completed, risk factors and events will be monitored to determine if in fact trigger events have occurred that would indicate the risk is now a reality.

Based on trigger events that have been documented during the risk analysis and mitigation processes, ELITE CONSTRUCCIONES S.L. Project managers will have the authority to enact contingency plans as deemed appropriate. Day to day risk mitigation activities will be enacted and directed by the project managers.

Contingency plans that once approved and initiated will be added to the project work plan and be tracked and reported along with all of the other project activities.

Risk management is an ongoing activity that will continue throughout the life of the project. Project status reporting contains a section on risk management, where new risks are presented along with any status changes of existing risks. Some risk attributes, such as probability and impact, could change during the life of a project and this should be reported as well.

4. RISK COMMUNICATION

Communications regarding risk are continuous throughout the projects life cycle both through verbal and written reports.

4.1 Periodic Status Meetings

On a periodic basis, the Risk Manager solicits updates from the risk owners and updates the risk register. Risk management activities and the current log of active risks are discussed at project team status meetings.

This includes formal and informal identification and status of individual risk activities and assignments. Current risk status and the results and effectiveness of mitigation/contingency actions are reviewed, along with the status of risk trigger events and risk profiles.

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4.2 Revision History

Any action taken on a specific risk will be logged in the Revision History field on the Risk Identification & Response Plan, and will be logged in the risk register by the Risk Manager. This will serve as the repository of the life cycle documentation of the risk activities. This will also serve for justifying specific actions that were taken along with completing the lessons learned. The pertinent date's event or decision made, the person(s) most knowledgeable about the event and a short description of the event will be captured.

4.3 Report Lessons Learned on Risks




The Risk Manager documents the result of risk actions (whether successful or unsuccessful) and lessons learned in the risk register. At the end of the phase, the Risk Manager discusses the results of the lessons learned sessions with the PM and with others as appropriate. The Risk Manager leads a final risk review to document the final status and results of mitigation and/or contingency actions to identify lessons learned during the project.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	SAFETY MANAGEMENT SYSTEMS AUDIT	HES 015
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	10 Oct 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
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2. PURPOSE AND SCOPE

Periodic audits of the ELITE HSE Management systems (EHSEMS) are necessary to determine whether the EHSEMS has been properly implemented and maintained.

This procedure defines the EHSAMS audit process for auditors and audited to ensure consistency in selection, undertaking, recording and Management of ELITE HSE Management system audits.

This procedure applies to all Management, contractor / sub-contractor, third party transport and all systems involved in the audit processes.

This procedure outlines the:

- Audit scope;
- Audit frequency;
- Audit Schedule;
- Audit methodologies;
- Auditor selection, independence and competencies;
- Audit Review and History

ELITE HSE Management System audit methodology is based on AS/NZS ISO 19011-2003 (Guidelines for quality and/or environment systems auditing).

3. DEFINITION

Conformance (C): - The auditee has demonstrated: full implementation of Company procedures, and compliance with legal requirements, and commitment to the principle of continual improvement.

Based upon the evidence obtained during the audit it is evident that the auditee has conformed with Company standards and procedure requirements, and is active in implementing additional measures to achieve continual improvement.

Minor Non Conformance: Based on the evidence obtained during the audit, it is evident that the auditee has not fully, effectively or consistently implemented Company procedures, and/or there is evidence of isolated instances of legislative non-compliance.

Preventive corrective action should be undertaken as a priority to avoid non-conformance in the future. The audit itself is a sampling exercise. If the sampling indicates isolated legislative non-compliance, it is likely that a regulator might reveal systematic non-compliance during more focused inspection or intervention. The criterion requiring correction may be linked to, or interdependent with, other parts of the EHSEMS. A failure relating to this criterion may therefore lead to a significant reduction in total system effectiveness, or wider procedure non-

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compliance. All non-conformances are documented in the audit report, and remedial action will be confirmed by subsequent verification.

Major Non Conformance: The auditor finds evidence that there is an absence of system elements or a part of the system, and/or a failure to follow the documented systems or procedures, and/or a lapse in the system or procedure, and/or apparent systemic legislative non-compliance.

Corrective action must be undertaken to prevent injury, ensure continued certification and ensure legislative compliance. The EHSEMS auditor is required to report serious hazards or potentially dangerous occurrences to the senior management, the Head of Department and the HSE Manager. All major non-conformances are documented on Corrective Action Reports, and remedial action will be confirmed by subsequent verification.

Not Verified: The auditor cannot confirm implementation of elements of the EHSEMS because: the related activity has not yet occurred, so objective evidence is not available; or the criterion, whilst included in the audit scope, was not examined during the audit; or evidence could not be provided due to an unforeseen circumstance.

The auditor may not have reviewed key documents, interviewed staff or visited key areas owing to issues such as staff absence or time constraints. The criterion remains untested and should be considered for inclusion within the scope of subsequent audits.

Not Applicable (NA): There is no indication of a particular activity having occurred, and therefore the auditee is not required to implement this part of the EHSEMS to satisfy the specified criterion.

Audit Guide: a member of staff from the area being audited who can escort the auditor to interview appointments and/or locations to be inspected as part of the audit.

Audit Report: A report provided by the auditor to the auditee, detailing the results of the audit and any non-conformances.

4. AUDIT STRATEGY

This internal audit function to be align to organization target& objectives must follow four-step process for management to follow in creating a formal strategy document:

- Develop and refine internal audit’s strategic vision;
- Identify and prioritize key strategic initiatives;
- Design key performance indicators;
- Develop an operating strategy

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5. AUDIT PROCEDURE

5.1 AUDIT SCOPE

To establish that relevant EHSEMS procedures, guidelines, forms and checklists are sufficiently implemented across all levels of workforce to meet the OSHA standards criteria and a minimum EHSEMS implementation audit score of 80%.

5.2 AUDIT FREQUENCY

ELITE Health, Safety and Environment Management System (EHSEMS) audit frequency is annually. But, ELITE management may increase internal audit frequency for one or more of the following reasons:

- significant adverse findings resulting from an internal audit;
- significant escalation in workers incident frequency rate;
- Significant escalation in regulatory activity; or other information that may indicate the EHSE Management System is not performing optimally.

5.3 AUDIT SCHEDULE

The HSE Manager, in consultation with Operation Manager and Site Supervisors, shall develop the EHSEMS Audit Schedule. The schedule shall be reviewed annually and based on:

- previous audit results; and
- the priority and risk profile of the management

5.4 AUDIT METHODOLOGY /PROCESS

The auditee will be contacted by the auditor with adequate notice to arrange a suitable date, time, and place for the EHSEMS audit and pre-audit meeting, and to appoint an audit guide to develop an audit schedule, and to liaise about details of the audit. The auditee must complete the Self Audit Tool (SAT) and return it to the Auditor at least two weeks prior to the commencement of the EHSEMS audit. The EHSEMS auditor should then follow the audit process as follows:

1. Conduct a pre-audit meeting with the auditee prior to the audit to explain the audit process, finalize the audit schedule, and provide an opportunity for the auditee to ask any questions about the audit. It is recommended the following representatives of the area being audited be present:

- HSE Department Head
- Operation Manager
- The person responsible for HSE document control

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2. On the day of the audit, conduct an opening and closing meeting with the relevant auditee representatives. If possible, all persons who will be interviewed during the audit should attend.
3. Interview a representative sample of stakeholders to review effective implementation of the EHSEMS and consultative arrangements. Interviews should include:
 - Management representative(s)
 - HSE representative
 - Other personnel representing a cross-section of the activities of the area being audited.
4. Review and assess relevant local workplace documentation, including:
 - Operational/Management Plans, Key Performance Targets (KPT's), Objectives and Targets
 - HSE Risk Register(s), Risk Assessments and Safe Work Procedures (SWPs)
 - HSE Training Needs Analysis, Training Plan and Training Records
 - HSE Inspection Testing and Monitoring register, and Workplace Inspections
 - Emergency and First Aid systems
 - Material Safety Data Sheets (MSDS)
 - Maintenance and inspection records
 - HSE Committee meeting minutes.
5. Review and assess the implementation of local workplace risk controls, including:
 - Mechanical
 - Electrical
 - Chemical storage and handling
 - Manual Handling
 - Housekeeping
 - Emergency and First Aid equipment and facilities
 - Other relevant risks.
6. Conduct any other relevant information gathering required to complete the audit.
7. Auditor to prepare the audit report and provide it to relevant management and HSE Committee representatives for distribution. The auditor will also provide a copy to the manager of the HSE Department, and to the relevant Departments.

5.5 AUDIT EVIDENCE

During the EHSEMS audit, information relevant to the audit criteria and EHSEMS implementation will be collected by appropriate sampling, observation and discussion with people who work within the audit area. Only information that is verifiable may be audit evidence.

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5.6 AUDIT OPENING MEETING

The EHSEMS auditor should, where reasonably practicable, commence the audit with an opening meeting with the relevant auditee representatives, addressing the following agenda items:

1. Introduction
2. Confirmation of the audit scope
3. Explanation of the audit process
4. Confirmation of the audit schedule, expected closing meeting time, and location
5. Confirmation of audit details with the audit guide(s)
6. Other business, including questions.

5.7 AUDIT CLOSING MEETING

The EHSEMS auditor should, where reasonably practicable, conclude the workplace verification component of the audit with a closing meeting with the relevant auditee representatives, addressing the following agenda items:

1. Appreciation of those involved in the audit
2. Brief outline the findings known to date, that is, areas of:
 - Good performance
 - Average performance
 - Poor performance
3. Explanation of the next stages in the audit process, including expected completion date of the written report and its subsequent distribution
4. Other business, including questions.

6. AUDITOR SELECTION, INDEPENDENCE AND COMPETENCIES

The HSE Manager shall ensure that EHSEMS auditors are independent of the area they are auditing (auditors must not have provided HSE services, advice or consultancy to the auditee area within the last a year); or put in place suitable arrangements to manage any potential conflicts of interest.

The HSE Manager shall select EHSEMS auditors that are sufficiently qualified, competent and experienced to perform EHSEMS audits. Where the auditor(s) are not sufficiently qualified, competent and experienced, the internal auditor(s) may be supported by other experts to enable them to perform audits competently.




	SAFETY MANAGEMENT SYSTEMS AUDIT	HES 015
	<i>Document Title</i>	<i>Document No.:</i>

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.


	MANAGEMENT OF CHANGE	HES 016
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	10 Oct 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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	MANAGEMENT OF CHANGE	HES 016
	<i>Document Title</i>	<i>Document No.:</i>

2. INTRODUCTION

No modification shall be made to a plant, equipment, control systems, process conditions, and operating procedures without authorization from a responsible manager or his delegate.

Proposed modifications must be evaluated for Safety, Health and Environmental impact and a signed document should be available before the change can be implemented. The document should be signed for a second time before the equipment is released to become operational. This ensures the change has been carried out in accordance with the Management of Change document.

The Management of Change Procedure (MOC) is geared to safe process and equipment modification.

3. SCOPE AND PURPOSE

3.1 Scope

Depending on the scale or complexity of work, two authorization routes can be considered:

- I Changes within the authority of an operation site manager, approval limits need rigorous definitions to avoid problems.
- II Changes for which the site manager needs third party approval (e.g. design authority, safety department).

4 PRINCIPLES OF MOC

The principle for management and control of plant and equipment modification is divided into 8 stages:

5.1 Initiation

Generation of an improvement idea or a solution to a problem is communicated within a department, etc.

5.2 Appraisal

Evaluation of technical, operational, safety, environmental, quality and economical aspects of the change. Operation management will be provided with specialists to review the proposal. This is to prevent hasty or not well thought out changes being implemented. The review may identify additional information for decision-making.

5.3 Approval

	MANAGEMENT OF CHANGE	HES 016
	<i>Document Title</i>	<i>Document No.:</i>

The Management of Change documentation must be agreed by appropriate personnel, technical, safety, environmental and economical and final approval to be received by one manager overseeing the operations.

Design and engineering activities. When necessary, the detailed design and engineering activities must be carried out for the modification.

5.4 Implementation

An implementation plan/program must be documented. The plan/program may include purchasing, work planning, contractors, supervision etc.

5.5 Verification

The change must be verified to ensure that it is in accordance with the change note and all relevant requirements prior to restarting the Changed Process.

5.6 Documentation

Update all relevant documentation such as product specifications, operating procedures, control logic documentation, alarm trips schedules, drawings and manuals, pressure test certificates, cleanliness certificates, training records, etc. Trace and record the different changes with their date of change.

5.7 Training

Ensure that affected employees and contractors are trained on the impact of the change prior to the restart of the changed process.

5.8 Emergency MOC's

An Emergency MOC is a change that must be performed on a true emergency basis because of any of the following situations:

1. The process must be changed to correct a deficiency that would cause a hazardous condition that is an immediate threat to the safety and health of the site personnel or the public.
2. The process must be changed to prevent an immediate environmental release.
3. The process would be in jeopardy of not providing product to clients, owing to equipment failure or unforeseen design errors.


Emergency Changes must be reviewed and followed up.

6 PROCEDURE

A typical Management of Change procedure is represented by MOC Form and flowchart (Please see Annex 4).

7 CHECKLIST

The suggested Management of Change checklist should be used in the initial and appraisal stage to ensure that all safety aspects are covered and no omissions have been made.

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Appendix 1 - Management of Change Procedure Safety Checklist Guidelines

1. Location - evaluation

- Explosion/fire
- Noise
- Utilities available
- Ground stability - foundation
- Drainage
- neighboring activities
- Mobile crane and FLT accessibility
- Site traffic control
- Third party risks
- Hazard quantifications
- Soil contamination

2. Equipment selection specifications

- Pre-purchase analysis
- meeting design criteria and purchase order specifications

3. Material selection specifications

- Compatibility with product use
- Meeting/exceeding wall thickness and/or desired pressure
- Cleaned when required
- Electrical motors, panels, components and wiring conform to standards
- Fitness for intended purpose

4. Codes

- Do equipment and/or processes comply with applicable codes
- Pressure vessel and piping codes
- Fire protection
- Electrical
- Noise
- Emissions (air, water)

5. Cleaning procedures


- Oxygen cleaning
- Scrapped equipment to be cleaned

6. Welding/ brazing/testing procedures

- Special welding requirement with regard to materials, procedures or operating conditions
- Welding certificate
- Radiographic inspection requirement
- brazing material, cryogenic/non-cryogenic
- Welders qualifications

7. Pressure testing

- Approval test procedures available
- Hydraulic testing required
- Pneumatic testing
- Recording of testing done

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- Pre-tested piping used - certificates yes/no
- Safety distances
- Certification by official bodies

8. Pressure protection

- Relief valves / bursting disc required due to pressure - temperature
- Relief valve in cryogenic piping between isolation points
- Relief devices on liquefied gas lines
- Over-protection pressure gauges
- Pressure protection vacuum system
- Under pressure protection system
- Are pressure protection reliefs and bursting discs suitably sized + safety routed/vented

9. Temperature protection

- Safeguard personnel from hot/cold surfaces
- Alarms provided for high/low temperature in process
- Low temperature embrittlement of materials possible
- Materials protected against high temperature

10. Electrical system

- Electrical system conforms to regulations
- Grounding protection
- Identification voltage
- Main shut-off switch
- Lock/out capability
- Emergency switch
- Remote start/stop switches
- Electrical isolation considered
- Back-up system
- Overload protection electrical equipment
- HV-transformers and cabling adequately isolated
- Equipment adequate protected against collision damage

11. Process equipment isolation

- Easy access to manual isolation valves
- Response time automatic isolation valves sufficient
- Fail safe isolation requirements met

12. Fire protection

- Hydrant available/accessible
- Fire hose lengths adequate to reach equipment area
- Fire extinguishers
- Alarm system at or near equipment area
- Automatic systems required
- Fire detectors

13. Equipment guards - protective shields/barriers

- Machine guards on rotating equipment
- Guard rails
- Bumper posts
- Oxygen flash protective shields/barriers

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- Noise reduction

14. Ventilation/air monitoring

- Release of inert/toxic flammable gases possible
- Present natural ventilation sufficient
- Forced ventilation required
- TLV values considered
- Monitoring required (e.g. O₂ level)
- Local aspiration required

15. Access to control equipment

- Locate to be maintained easily
- Install stationary ladder, platform, and guardrails

16. Labeling (piping, panels, etc.)

- Process identification by labeling
- Chemical lines
- Process piping
- High voltage identification
- Flammable storage
- Toxic storage

17. Drawing updates

- Construction drawing
- P&I diagrams
- Electrical diagrams
- Instrument loop diagrams
- Fire protection diagrams

18. Warning signs/warning devices


- Mandatory signs in place: atmospheric hazard warning chemical hazard warning flammable product warning automatic machine start warning
- Back-up (power, instrument air)
- Alarms and signalization

19. Environmental emissions/ Permits

- Noise within limit (industrial residential)
- Air emission control/testing; required permits available
- Water discharge
- Contamination municipal sewer possible contamination canals, etc. possible
- Permits available
- Contaminations of soil or groundwater possible
- Control of combustion equipment (boilers, etc.)
- Spillage Control

20. Hazardous waste

- Waste accumulation and quantity
- Permits required

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- Storage and disposal procedures
- Disposal route according law
- Disposal of non-hazardous

21. Product control measures

- MSDS for Chemicals available.

22. Access and Egress

- Exit doors not blocked by equipment or piping
- Equipment room doors equipped with panic bar
- Area lighting adequate, emergency lighting available
- Eliminate tripping hazards on exit routes
- Where required, stairs and/or permanent ladders provided to aid egress
- Two exits where necessary

23. Tripping hazards

- Conduits, pipes, valves, etc. not located in walkways
- Eliminate tripping potential
- Floor opening covers level with grade
- Storage does not protrude into walkways

24. Sharp edges - Protruding obstacles

- Round off sharp edges or give protection
- Clearance on overhead pipes etc.
- Valve handle direction away from persons

25. Equipment lockout capability

- Electrical
- Mechanical

26. Emergency shower/eve wash

- Chemicals used requiring special wash

27. Emergency procedure

- Emergency plans to be revised
- Special training required

28. Operating procedure

- Operating procedure to be revised
- Additional job training necessary
- Safety aspects recognized
- Revision of pre-start and post stop instructions
- Workplace risk assessments/Job Safety Analysis available or completed.

29. Contractors

- Selection
- Training
- Co-ordination
- Supervision
- work permits

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30. Operators training

- Training should include but is not limited to:
- Start - up/shutdown procedure
- Instrumentation control method
- operating temperatures and pressures
- Alarms and shutdowns
- Vibration control

30. Operators training (cont'd)

- Electrical isolation procedure
- Normal log control - i.e. daily temperatures/pressures, etc.
- confined space entry procedure
- Emergency procedures

31. Personal protection equipment other than "normal" equipment required

- Respirators
- Fire resistant clothing
- Chemical protecting garments etc.

32. Lifting devices - Lifting

- Well balanced eyebolt or similar on equipment
- control weight restrictions and movement.
- FLT training

33. Control of contractors

- Introduction training, incl. asphyxiation- and fire hazards
- Work permit
- Control of cranes
- Product hazards
- Digging operation/excavations

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	<i>Document Title</i>	<i>Document No.:</i>

Appendix 2 - Management of Change Procedure

MANAGEMENT OF CHANGE PROCEDURE

Location: _____ Date: _____ Product: _____

Modification description:

Equipment: new modified relocated
Process: change extensions

Max/Min pressure:


Max/Min temp:

Chemical react. :

Misc. (toxic):

Check off all items carefully. Use enclosed MOC Guideline.

- 1 Site evaluation
- 2 Equipment selection specifications
- 3 Material selection specifications
- 4 Codes
- 5 Oxygen cleaning procedures
- 6 Welding/testing procedures
- 7 Pressure testing procedures
- 8 Overpressure protection
- 9 High/low temperature protection
- 10 Electrical system
- 11 Process and/or equipment isolation
- 12 Fire protection
- 13 Equipment guards - protection shields/barriers
- 14 Ventilation - air monitoring
- 15 Access to control equipment
- 16 Labeling (piping, panels, etc.)
- 17 Drawing updating
- 18 Warning signs, warning devices
- 19 Environmental emissions/ Permits
- 20 Hazardous waste
- 21 Product or chemical spill control measures
- 22 Access and Egress from buildings, enclosures, equipment
- 23 Tripping hazards
- 24 Sharp edges - protruding obstacles
- 25 Equipment lockout capability
- 26 Emergency shower/eye wash requirement
- 27 Emergency procedure
- 28 Operating procedure
- 29 Contractors
- 30 Operators training
- 31 Personal protection equipment
- 32 Lifting devices
- 33 Control of contractors

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Appendix 3 - MOC REVIEW and APPROVAL

Includes here the listing of the people with their department of assignment: Design, Operation, Methods, Safety.	
Initial Review by :	Date :
Signature :	Department:
Approval before commencement of Change	
Reviewed and agreed by :	
Department :	
With/without comments:	
Date:	
Signature:	

This change (specify here the change) is approved for release (Operation manager or delegate)	
Name:	Date :
Residual work completed Date:	

Persons trained / to be trained in change:



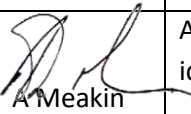
Name	Department	Date

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	JOB SAFETY ANALYSIS	HES 017
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	Added the hazard identification tool

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	JOB SAFETY ANALYSIS	HES 017
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this job hazard analysis is to ensure potential hazard, related to a specific project or activity, are anticipated and abated before beginning work and to determine procedure on how to perform a job safety analysis for jobs worked by for ELITE. This standard covers the preparation and implementation of a job safety analysis (JSA) and will identify when a JSA is required. The best job hazard analyses are those that are focused, complete, clearly, documented, communicated to employees, and implemented. The purpose of this standard is to help make that happen.

3. SCOPE

This standard applies to all employees of ELITE Construcciones SL and to all other personnel (Supplier, contract and subcontract – casual, full, and part-time) that work at locations operated by ECSL.

4. RESPONSIBILITIES

Management:

- Ensure complete & effective JSA's are developed for all tasks to be done
- Ensure JSA's are reviewed with new hires and annually thereafter
- Utilize JSA's in accident investigations and retraining
- Ensure JSA's are modified if a new step or process is added
- Ensure JSA's are developed for non-routine tasks that have a high degree of safety risk

Supervisors:

- Use JSA's to train all new employees
- Use JSA's when performing job performance evaluations
- Develop and submit JSA's for all tasks in their area of responsibility
- Review JSA's annually with all employees assigned to their department

The most important person in JSA process is the Supervisor, who is in constant contact with employees and should be familiar with the hazards in their Department. Supervisors are in a better position to recognize and correct unsafe acts and conditions as they occur.

Safety Coordinator:

- Assist Management and Supervisors in developing JSAs
- Maintain a master file of all JSAs
- Ensure new JSAs are developed for new equipment or processes

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5. DEFINITION

Energy Sources For the purpose of this standard; energy sources include, but are not limited to the following:

Physical Hazards:

- Pressure (Liquid or gas)
- Electricity
- Under Stress (e.g. spring release)
- Gravity (e.g. falling)
- Dynamic situation (e.g. pinch points on rotating equipment)
- Natural Environment (e.g. heavy rain, strong wind)

Chemical /Biological Hazard

- Chemical (e.g. corrosives, flammable fluids and gases, toxic gases)
- Radiation
- Biological (e.g. snakes and insect)

Human Factor

- Psychological
- Ergonomic
- Security

Hazard A hazard is a condition or action that has the potential for an unplanned release of – or unwanted contact with – an energy source that may result in harm or injury to people, property, or the environment.

Job Safety Analysis (JSA) A process used to identify and assess hazards associated with a specific activity and for implementing control measures to eliminate or minimize hazards, prior to beginning work.

5. Definition (cont'd)

Routine Task Jobs that are performed on intervals less than 2 months by experienced crew members in accordance to a documented operating procedure or accepted work practice.

Non-Routine Task. An activity that does not perform on a regular basis or does not satisfy the requirement of routine task job definition.

High Risk For the intent of this document; high risk activities are activities that could reasonably result in a category 2, 3, or 4 consequence incident (Refer to Hazard and Risk Management Plan), as well as activities that score 16 or more on the Overall Risk Ranking of a risk assessment.

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6. PROCEDURE

6.1 JSA Application

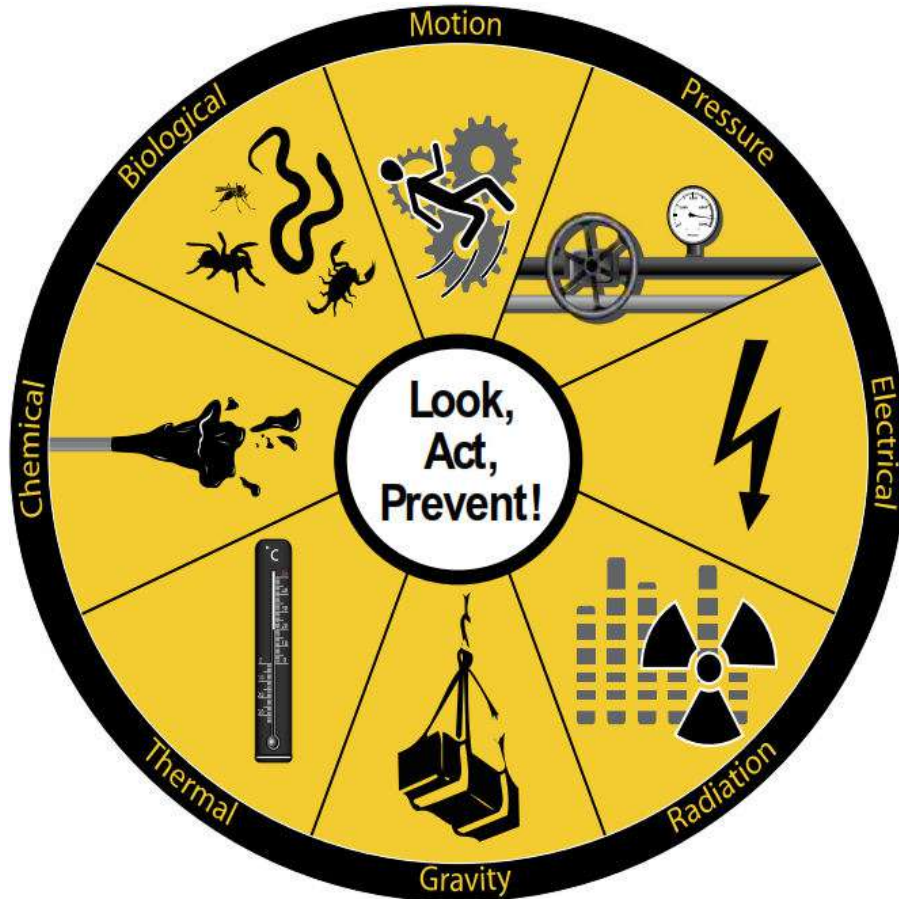
6.1.1 Conditions – A Job Safety Analysis (JSA) is required for jobs that are considered non-routine task or any high risk activities. Job Safety Analysis is required once only for Routine jobs and no longer required after the JSA is incorporated in the standard operating procedure of the said routine jobs. Unless otherwise, new hazard(s) are identified or new crew member is doing the task, then JSA shall be review again.

6.1.2 JSA shall also be performed, if:

- A member of the work crew requests that a JSA be performed to adequately identify and address the hazards of the task; and
- A HSE professional believes it necessary to perform a JSA for a specific task;

6.2 JSA Hazard Identification

6.2.1 Identify the hazards and risks associated with the activities described in the job lists with reference to eight sources of hazards described below in the hazard identification tool, along with pertinent examples of job related hazards. Below are the identified hazards but not limited to:



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Energy Source	Description	Potential Hazards
Motion	The change in position of objects or substance including the energy of the components of a mechanical system, i.e. rotation, vibration, motion, etc. within otherwise stationary piece of equipment/machinery	<ul style="list-style-type: none"> • Impact with a falling or flying object. • Penetration of sharp objects. • Caught in or between a stationary/moving object. • Excessive lifting, twisting, pushing, pulling, reaching, or bending. • Repetitive motion • Slips and trips • Exposure to vibrating tools
Gravity	The force caused by the attraction of all other masses to the mass of the earth.	<ul style="list-style-type: none"> • Falls from height • Dropped objects
Pressure	Energy applied by a liquid or gas which has been compressed or is under a vacuum.	<ul style="list-style-type: none"> • Unexpected release from pressurized plant or equipment
Thermal	The measurement of differences in the thermal energy of objects or the environment, which the human body senses as either heat or cold.	<ul style="list-style-type: none"> • Exposure to hot surfaces • Hot work • Exposure to cryogenic processes
Electrical	The presence and flow of an electric charge	<ul style="list-style-type: none"> • Contact with live conductors • Static electricity
Chemical	The energy present in chemicals that inherently, or through reaction, has the potential to create a physical or health hazards to people, environment or equipment.	<ul style="list-style-type: none"> • Harmful levels of gases, vapors, liquids, fumes, or dusts. • Release of produced hydrocarbons
Radiation	High energy emitted from equipment and sources including but not limited to radioactive elements and naturally	<ul style="list-style-type: none"> • Light (optical) radiation (i.e. welding operations, etc.).

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Biological	occurring radioactive materials (NORM). Environmental conditions including living organisms that can present a hazard.	<ul style="list-style-type: none"> • Noise; Sounds • Radiation from Non Destructive Testing work (x-ray) • Work near water (potential for drowning) • Adverse weather conditions • High noise
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6.2 JSA Hazard Identification (cont'd)

6.2 To facilitate the hazard identification process in the job planning cycle, Appendix B includes a “Hazard Identification – Job Site Checklist”. This checklist will be completed by the planning organization and included in the job work pack. This checklist will be reviewed and updated as the job progresses from planning to execution with the results incorporated into the toolbox talk, JSA, and/or safe work permit documentation prepared for the work activity.

6.3 REQUIREMENTS

6.3.1 A job site walkthrough shall be performed by the ELITE Supervisor designated to lead the JSA. Other key personnel involved in the job should also review the job site area before a JSA is performed.

6.3.1.1 The ELITE-JSA Form (Appendix A) is to be used for all JSAs performed for work conducted within an ELITE facility. When working with the client, JSA client’s format will be used to conform with their Safety management system.

6.3.1.2 Contractors performing a JSA under the direction of ELITE are required to use the ELITE-JSA Form and should conduct the JSA as per this standard.

Note - The contractor can also attach their own JSA form if desired.

6.3.1.3 All sections of a JSA shall be properly completed

6.3.1.4 ELITE JSAs will be reviewed by the HSE Department Head and Approved by the Operation Manager.

6.3.1.5 JSAs must be specific to the job.

6.3.1.6 All JSAs shall be reviewed by the HSE Department prior to starting the job.

6.3.1.7 Completed JSAs shall be filed by the HSE department.

7.0 JSA TECHNIQUES

There are 8 steps required to properly complete a JSA. The steps are as follows:

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Step 1 Assemble Team - Gather personnel involved with the job including the subject matter expert, if needed. An ELITE Supervisor shall lead the team in the development of the JSA.

Step 2 Define the Scope - Perform a walkthrough in the job location and define the scope of the job to be analyzed.

Step 3 Identify the Basic Job Steps – Break the job down into its basic sequence of steps.

Step 4 Identify the Hazards - For each of the pre-defined job steps, identify the hazards specific to each one.

Step 5 Control the Hazards – For each of the hazards identified determine the actions necessary to control identified hazards. Assign individuals to control the hazards.

Step 6 Forward JSA to HSE – Forward the JSA to the appropriate HSE Professional for review.

Step 7 Forward JSA for Approval – Forward the JSA to the appropriate Superintendent for approval.

Step 8 Review Requirements of JSA – Cover the requirements of the JSA with applicable job site employees and ensure that individual assignments for each corrective action are implemented. Document that the JSA was reviewed by having personnel sign the JSA form.

8. EMPLOYEES TRAINING

8.1 All new ELITE employee / contractor must undergo a Job Safety Analysis training in a classroom and in a visual presentation.

8.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Job Safety Analysis standard.

8.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

8.4 Annual training/refresher will be conducted and evaluated to maintain employee’s knowledge and awareness with regards to ELITE Job Safety Analysis standard.

8.5 English and Spanish training are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Job Safety Analysis procedure.


9. REVIEW AND EVALUATION

	JOB SAFETY ANALYSIS	HES 017
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This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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APPENDIX A (JSA FORM)



JOB SAFETY ANALYSIS (JSA)

Category: Construction Production Processing

JSA MUST BE REVALIDATED PRIOR TO USE DATE JSA PERFORMED: September, 2012

<small>Job/Task/Operation:</small> Civil Works on Security Level		<small>Date of Work:</small> September 30, 2012	<input type="checkbox"/> Revised JSA <input checked="" type="checkbox"/> New JSA <small>Page # of #</small>	
<small>Department:</small> ELITE Construcciones S. L.	<small>Name of Person Supervising Job:</small> Juanito Luay	<small>Analysis Performed By:</small> Sam Carangilan		
<small>Personal Protective Equipment Needed:</small> Hard Hat, Safety Glasses, Safety Shoes, Gloves, Dust Mask, High visibility vest, Hearing protection, Face shield, Pff clothing	<small>Location:</small> Suspension Bridge and CCTV Marine Tower	<small>HES Review:</small>	<small>Approval:</small>	
		<small>Date:</small>	<small>Date:</small>	

<u>Key Job Elements</u> <small>Sequence of Basic Job Steps</small>	<u>Potential Hazards</u> <small>Hazards (energy sources) & Dangers (potential harm from those sources)</small>	<u>Recommended Corrective Action or Procedure</u> <small>Including Assigned Responsibilities</small>
1. Pre-Plan Job / Identifying hazards present in the work area / Determining scope of work	1a. Lack of familiarity with the location / personnel involved are unaware of job specific hazards	1a1. Juanito Luay conduct pre-job safety meeting and assigns task assignments. Includes vehicle parking locations. 1a2. Juanito Luay shall communicate site & job specific hazards to all involved in the work activity. 1a3. Juanito Luay shall communicate emergency procedure/muster point locations/contact phone numbers/radio channels to all personnel during daily toolbox meeting
2. Mobilization of tools, equipment and materials to site.	2a. Motion – Vehicles moving on site hit by equipment/ Pinch Points (Risk of pinching fingers while unloading machines & equipment) 2b. Pressure – Hydraulic hoses breaking	2a1. Juanito Luay to ensure that the equipment used is in good & safe condition and the daily inspection record from operator is filled out before commencing work and always available for viewing if needed. 2a2. Juanito Luay to ensure that all heavy equipment and vehicles used in mobilization and materials delivery on site are guided by escort cars. 2a3. Juanito Luay should assign Spotter/ Banks man and is designated to assist heavy equipment maneuvering on site. All other personnel should stay at a safe distance/place and be visible to the operators. – Hi viz jackets to be worn by banks man. 2a4. Juanito Luay to discuss the areas of pinch points while unloading materials & equipment & to make sure that workers involved wear appropriate PPE's properly at all times. 2b. Juanito Luay to ensure that all vehicles and equipments used in the delivery of tools, equipments and materials to site

APPENDIX B (HAZARD IDENTIFICATION CHECK LIST)

HAZARD IDENTIFICATION

JOB SITE CHECK SHEET

WORK ORDER NUMBER :-	
EQUIPMENT & LOCATION :-	
TASK DESCRIPTION AND STAGES :-	

TO BE COMPLETED BY PLANNER

Ref	Are any of the following Hazards Present in the WORK AREA	Describe Hazard Identified	To Be Controlled		
			YES	NO	N/A
1	Lack of Familiarity with the location	_____			
2	Poor Access or Egress	_____			
3	Slips / Trips / Falls	_____			
4	Poor Lighting	_____			
5	Electricity	_____			
6	Restricted or Confined Space	_____			
7	Adjacent Operations	_____			
8	Falling from Height	_____			
9	Hot or Cold Surfaces	_____			
10	Dropped Objects	_____			
11	Obstacles at Worksite	_____			
12	Poor Communications	_____			
13	Lone Working	_____			
14	Extreme Working Conditions (e.g. Weather / Noise / Temperature etc.)	_____			
15	Radiation	_____			
16	Snakes / Insects / Vegetation	_____			
17	Vehicle Movements	_____			
18	Sea State	_____			
19		_____			
20		_____			
Will you be exposed to any of the following Hazards from the EQUIPMENT BEING WORKED ON					
21	Lack of Equipment Familiarity	_____			
22	Pressurised Plant or Equipment	_____			
23	Electricity or Static Electricity	_____			



JOB SAFETY ANALYSIS

HES 017

Document Title

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24	Moving Machinery or Equipment	_____			
25	Hot or Cold Surfaces	_____			
26	Stored Energy (Mechanical / Process/ Electrical)	_____			
27	Process Conditions	_____			
28	Pinch Points	_____			
29	_____	_____			
30	_____	_____			

Does the task involve Exposing you to the following Hazardous MATERIALS or SUBSTANCES


31	Hydrocarbon Liquids	_____			
32	Hydrocarbon gas	_____			
33	Chemicals	_____			
34	Oils (lubricants etc	_____			
35	Inert Gasses	_____			
36	Waste Handling / Spill control	_____			
37	Fumes / Asphyxiants / Gasses	_____			
38	Flammable Materials	_____			
39	Hot or Cold Liquids	_____			
40	Dust or Fine Particles	_____			
41	Mineral Fibers	_____			
42	Asbestos / CAF Joints	_____			
43	Explosives / Pyrotechnics	_____			
44	Pyrophoric Scale	_____			
45	Solids	_____			
46	Radioactive Source	_____			
47	_____	_____			
48	_____	_____			

Hazards to you from the TOOLS or EQUIPMENT BEING USED




49	Hand Tools	_____			
50	Air Powered Tools	_____			
51	Electrically Powered Tools	_____			
52	Hydraulic Powered Tools	_____			
53	Pressure Supplying Equipment	_____			
54	Non Intrinsically Safe Equipment	_____			
55	Mechanical Spark Potential	_____			
56	Electrical Spark Potential	_____			
57	Rigging / Lifting Equipment	_____			
58	Sharp Tools	_____			
59	Mobile Plant	_____			
60	Inspection or NDT Equipment	_____			
61	Laser Equipment	_____			
62	Scaffolding / Ladder Access	_____			
63	HV Test Equipment	_____			
64	_____	_____			
65	_____	_____			

Hazards to you from the TASK or ACTIVITY ITSELF

66	Unfamiliar Activity, Not Performed Before or with Previous Incident	_____			
67	Complex Task	_____			
68	Breaking Containment	_____			


	ASBESTOS EXPOSURE CONTROL PLAN	HES 018
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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	ASBESTOS EXPOSURE CONTROL PLAN	HES 018
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

This standard applies to all ELITE employees and contractor in all worksites involving asbestos exposure. Following are the elements of this scope:

- 3.1 Management
 - 3.1.1 PPE requirement
 - 3.1.2 Identification Program
- 3.2 Operations and Maintenance
 - 3.2.1 Work Procedures
 - 3.2.2 Training
 - 3.2.3 Waste Management
 - 3.2.4 Air Monitoring

3. RESPONSIBILITIES

4.1 Management responsibilities are to:


- Coordinate the work activities that relate to asbestos containing areas.
- Inform workers and contractors of asbestos locations.
- Educate workers on Asbestos identification program.
- Inspect and reassessment of procedures.
- Review program.

4.2 Operations and maintenance Supervisors responsibilities are to:

- Ensure work is carried out using appropriate Work Procedures as defined by regulation.
- Ensure workers at risk have appropriate training.
- Be knowledgeable on emergency work procedures.
- Be aware on company waste management program.

4.3 Employee/worker/contractor responsibilities are to:

- Ensure asbestos containing materials are not damaged or disturbed in areas they occupy.
- Inform Facilities Management & the Health, Safety & Environmental Department of any damage to asbestos containing materials.

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4.0 INTRODUCTION

ELITE CONSTRUCCIONES SL have concluded that a safeguard policy regarding asbestos exposure control should be established for our sites. This plan addresses the health and safety of the employees and contractors involved with renovation work, general repairs and construction works. In addition, a clear procedure for carrying out emergency repair work must be documented to ensure that no worker is accidentally exposed to asbestos fibres.

The Asbestos Exposure Control Plan (AECp) is intended to detect, assess and control any potential health hazard caused by the presence of asbestos identified in the building. The primary focus of the plan is to eliminate accidental worker and/or workers/contractor exposure to asbestos fibres and to ensure the health and safety of the site and visitors.

There are two components to the AECp:

Part A of the program is a management system which provides for a periodic reassessment of materials containing asbestos. Should routinely scheduled inspections indicate continuing disturbance or deterioration of friable asbestos, such material shall be removed or addressed in some other manner compliant with the requirements of the Occupational Health & Safety Regulations.

Part B of the program is Operations and Maintenance System which controls all routine maintenance, alteration, repair or other work activities which may disturb existing asbestos containing materials.


The second section of the program is staff procedures to ensure that asbestos materials are not damaged during normal activities and a reporting structure in the event that damage does occur.

5.0 ASBESTOS GENERAL INFORMATION

Asbestos is a generic term used to describe a group of naturally occurring fibrous minerals, divided on the basis of their mineralogical properties, into serpentines (“S” shaped) and amphiboles (“needle like”). The most significant health effecting property of asbestos is the presence of long, thin fibres that can be easily separated into small respirable fibres.

5.1 Potential Health Effects of Asbestos

Since the beginning of this century many serious, debilitating and often fatal diseases have been linked to the respiration of asbestos fibres. Although the mechanism of asbestos related diseases is still not fully understood, it is known that there is normally a long waiting (latency) period between the time of exposure and the occurrence of disease. This latency period can typically be between ten to over forty years. Asbestosis, Mesothelioma and Lung Cancer are the diseases most commonly

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associated with asbestos exposure, although several other diseases have been linked to asbestos exposure.

5.2 Asbestos Use

Asbestos was inexpensive to mine and has some very useful physical properties. As a result, it has been used in over 3000 different commercial products worldwide. Some of these physical properties include:

- High temperature resistance
- Tensile strength greater than steel
- Good soundproofing properties
- High chemical resistance
- Good electrical insulating properties
- Good mechanical strength

Asbestos has been widely used in building construction over many years and some uses continue today. Asbestos products are generally classed into two groups: friable and non-friable. Friable materials are those that, when dry, can be crumbled, pulverized or reduced to powder using moderate hand pressure. The use of friable materials in construction is banned today but due to its widespread use in the past, these materials are still present in many buildings today. In order to establish an AECP, the possible uses of asbestos must be known.

6.0 ASBESTOS EXPOSURE CONTROL PLAN (AECP)


The Asbestos Exposure Control Plan (AECP) contains two components: a management component designed to deal with the identification of all asbestos containing materials and the regular inspection of these materials and an operations and maintenance program.

The operations and maintenance program includes procedures for dealing with unidentified products that may be encountered during maintenance which may contain asbestos.

6.1 Objectives of the Asbestos Exposure Control Plan

The maintenance of a safe environmental for site production and maintenance workers depends on the establishment of an effective program. The program requires the following actions:

- A comprehensive building survey of suspected asbestos containing materials.
- Suitably identify and label all asbestos containing materials.
- Remove or repair materials which have become damaged, are in poor condition or which will be disturbed by building renovations.
- The development and implementation of procedures for building maintenance personnel for those activities which may require the assignment of an experienced asbestos removal contractor to supervise.

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- Provision of appropriate training and personal protective equipment (PPE) and appropriate equipment to workers who may come into contact with asbestos containing materials. Refer to ELITE HSE 002-PPE standard.
- Provision for re-inspection and re-evaluation of all asbestos containing materials on a regular, scheduled basis.

6.2 Co-ordination of Work Activities

Due to the overall perception that the general public has regarding asbestos, an important part of the management function will be to provide factual information and reassurance to employees, who may feel affected by the presence of asbestos. In addition, the management function should be involved in the selection and overview of outside technical expertise. The following issues will be addressed by the co-ordinating function:


- Maintain an inventory identifying asbestos materials and locations throughout the building.
- Implement a program to identify asbestos materials by labelling.
- Ensure employees and contractors are aware of the AECP.
- Undertake periodic inspections of identified asbestos containing materials.
- Amend the AECP based on the findings of these inspections.
- Investigate complaints immediately and take immediate action.
- Develop and implement work procedures relating to asbestos removal or enclosure. All asbestos removal, handling or facsimile will be carried out by an outside qualified agency.
- Ensure that work procedures for the handling and disposal of asbestos waste are followed.
- Conduct training seminars in asbestos awareness as required.

6.3 Management

6.3.1 Identification Program

An important part of the AECP is the physical identification of all the asbestos containing materials. To this end, all asbestos containing materials must be clearly labelled.

Asbestos containing materials are identified on each label. Any labelled material containing asbestos must not be disturbed by maintenance or employees until the work has been quantified and identified by the AECP coordinator. Only suitably trained and qualified personnel familiar with current asbestos safety precautions will be permitted to work on the material. Those materials not labelled or identified otherwise, shall be considered asbestos containing until analysis of the suspect material determines otherwise.

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6.3.2 PPE Requirements

6.3.2.1 Respiratory protection

(1) ELITE must supply, and ensure that workers within a designated work area wear, respirators which are adequate for the anticipated level of exposure.

(2) ELITE must ensure that a single use respirator is not used for protection against asbestos.

6.3.2.2 Protective clothing

(1) ELITE must ensure that all persons within a designated work area wear protective clothing which is made of material resistant to penetration by asbestos fibres, fits snugly at the neck, wrists and ankles, and as necessary to protect against the risk, covers the head and feet as well as the body.

(2) ELITE must replace or repair any torn or damaged protective clothing immediately.

(3) ELITE must ensure that a worker removes protective clothing and equipment before leaving the designated work area.

6.3.2.3 Information to laundry workers

ELITE must ensure that workers who launder clothing contaminated with asbestos are informed of the hazards of asbestos and the precautions required for handling the clothing.

6.4 Operations and Maintenance

6.4.1 Work Procedures

Contractors may have to work near or actually disturb asbestos containing materials during the normal course of their work. In order for these workers to proceed in a safe manner, work procedures covering a variety of tasks will be developed by all contracted workers. These procedures will include all work involving:


- Repair of damaged friable asbestos containing materials.
- Working with non-friable asbestos containing materials.
- Moderate and High Risk work procedures.
- Waste handling.

6.4.2 Waste Management

Any asbestos materials accumulated during renovation work, general repairs and construction works will be collected and stored in a sellable and lockable container. The handling, loading and disposal must be undertaken in accordance with client established waste management plan.

Asbestos waste includes:

- Debris or asbestos containing materials.
- Disposable coveralls and boots used during asbestos work.
- Sponges and other disposable cleaning materials.
- Plastic drop sheets.

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All asbestos waste shall be disposed of in a duly authorized hazardous waste landfill.

6.4.3 Air Monitoring

Air monitoring equipment are provided by the client. Air monitoring if required will be conducted in accordance with the requirements of the WorksafeBC OH&S Regulation - Part 6: Substance Specific Requirements (for asbestos). (Please follow link <http://www2.worksafebc.com/publications/ohsregulation/part6.asp#SectionNumber:6.12>)

(1) During a high risk work activity, except where glove bags are used as the containment, the client must sample for airborne asbestos fibre in

- (a) areas outside of the containment but in its vicinity, at least daily if there are unprotected workers in the area,
- (b) the clean room, at least daily during removal and cleanup operations, and
- (c) contaminated areas inside the containment, as necessary during removal and cleanup to ensure that workers are adequately protected.

(2) The client must make the results of all air samples taken during a high risk work activity available to the workers involved, within 24 hours of completing the collection of the samples.

(3) Except where glove bags are used as the containment, prior to dismantling a containment used in a high risk work activity and after all asbestos waste has been cleaned up, removed or otherwise controlled, the employer must ensure that the airborne asbestos fibre levels in these areas do not exceed 0.02 f/ml.

6.5 Employees Training

All ELITE employees and contractor working in areas containing asbestos containing materials will undertake a visual presentation and assessment regarding Awareness of Asbestos Exposure Control. An **annual visual presentation and evaluation** will be conducted to confirm the competency of each employee whose works will require exposure to friable Asbestos. An employee must have a grade of 80% and above to pass the said evaluation.

The awareness program will be carried out by an ELITE HSE training officer with expertise in the area.

7.0 EXPOSURE CONTROL PLAN

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7.1 Request for Information


The following information is to be provided to the Asbestos Exposure Control Plan (AECP) Coordinator, or designated representative, prior to the start of any work that might disturb asbestos containing materials. The AECP Coordinator shall review the hazard survey records prior to the start of work and inform all parties affected.

Work Location: _____	
Building: _____	
Floor and Room Area: _____	
Type of Work:	
Start Date: _____	Start Time: _____
Duration of Work: _____	Areas Affected: _____
Contact Person: _____	Phone Number: _____
Work Requested by: _____	Date: _____
Notes/Comments:	

7.2 Documentation of Results

The results (whether positive or negative for asbestos containing) shall be documented in a readily accessible format and shall be available to building maintenance staff, contractors and any workers likely to come into contact with asbestos containing materials during the course of their work. The report should include:

- A list of all materials containing asbestos.

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- Comprehensive results of bulk sample analysis.
- Description by room number or location of all sample locations.
- A list of materials requiring prompt removal due to severe deterioration.
- A list of materials requiring minor removal or repair due to slight deterioration.

The hazard assessment report will be in the custody of the AECPC coordinator, who will inform all workers likely to disturb any asbestos containing material. This will permit them to use appropriate procedures to protect both themselves and other building occupants from the release of any airborne asbestos fibres. Ready access to all sample analysis results and this AECPC plan must be provided to all workers who may come into contact with asbestos during the course of their employment.


7.3 Visual Re-Evaluation

All asbestos containing materials identified in the survey shall be re-inspected visually on a regular (minimum requirement is annually) basis. The re-inspection shall be performed by either the same person who carried out the initial survey or by a technical expert. Further bulk samples will not be needed, but the re-evaluation must encompass all factors originally noted and should concentrate on any signs of deterioration, delamination or disturbance by maintenance staff, renovation or occupant activity. In the event of disturbance of friable material by water leak, structural failure or other unforeseen occurrence, all asbestos in the area shall be re-evaluated promptly.

Any recommendations made as a result of these inspections will include details regarding the priority, nature and extent of any corrective actions.

Common corrective actions are:

- Encapsulation of damaged or exposed materials.
- Repair of damaged asbestos materials.
- Removal of damaged or exposed materials.

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Exposure Assessment

Carry out an exposure assessment in each room or space where sprayed or textured asbestos containing materials are located. Mark the appropriate rating.

Factors

Condition of Material

- Good condition
- Minor damage
- Poor condition

Water Damage

- No water damage
- Minor water damage
- Moderate to major water damage

Exposed Surfaced Area

- Insulation not exposed
- 10% or less exposed
- More than 10% exposed

Accessibility

- Not accessible
- Rarely accessible
- Accessible

Potential for Disturbance

- Low
- High

Air Plenum and Air Stream

- No air plenum or air stream
- Air plenum or air stream

Friable: **Yes** **No**

Definitions

- **Good condition** means no water damage, physical damage or deterioration.
- **High potential** means that ACM is exposed or accessible, in an air plenum or airstream, or is subject to vibration.
- **Friable** means a material which, when dry, can easily be crumbled or powdered by hand.

Analysis

Corrective Action: **Yes** **No**

Remarks

Additional sheets may be attached.

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8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	CONTROL OF HAZARDOUS ENERGY	HES 019
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

Main purpose of this standard is to safeguard ELITE CONSTRUCCIONES SL employees from the unexpected energization or start-up of machinery and equipment or the release of hazardous energy during service or maintenance activities.

3. SCOPE

1.1 This standard to the control of energy during servicing and / or maintenance of machines and equipment the standard applies to all sources of energy, including but not limited to: mechanical, electrical, hydraulic, pneumatic, chemical, and thermal energy.

3.2 The standard does not apply to general industry service and maintenance activities in the following situations, when:

3.2.1 Exposure to hazardous energy is controlled completely by unplugging the equipment from an electric outlet and where the employee doing the service or maintenance has exclusive control of the plug. This applies only if electricity is the only form of hazardous energy to which employees may be exposed. This exception encompasses many portable hand tools and some cord and plug connected machinery and equipment.

3.2.2 An employee performs hot-tap operations on pressurized pipelines that distribute gas, steam, water, or petroleum products, for which the employer shows the following:

- Continuity of service is essential;
- Shutdown of the system is impractical; and
- The employee follows documented procedures and uses special equipment that provides proven, effective employee protection.

3.2.3 The employee is performing minor tool changes or other minor servicing activities that are routine, repetitive, and integral to production, and that occur during normal production operations. In these cases, employees must have effective, alternative protection.

4. RESPONSIBILITY

4.1 The HSE Department head is designated as the Program Coordinator for this company. Specific responsibilities include:

4.1.1 Provide Hazardous Energy Control training to employees.

4.1.2 Maintain a current listing of employees who have completed lockout training.

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- 4.1.3 Maintain a current listing of all equipment/machines that fall under the Hazardous Energy Control program. Listing is to be updated each time a change occurs.
- 4.1.4 Implement and enforce this program.
- 4.1.5 Maintain an adequate supply of padlocks and DANGER tags for use each time a lockout process is performed. Padlocks are located at the office of HSE Department.
- 4.1.6 Conduct the annual inspection and review as required by section VII.

4.2 Each supervisor is responsible for the effective use of this program in the work group and to see that all required procedures are followed in every instance.

4.3 ALL ELITE CONSTRUCCIONES SL employee/contractor is responsible for learning and following the procedures and practices developed under this program. Notify the Program Coordinator prior to a lockout process.

5. BASIC LOCKOUT PRINCIPLES

All equipment must be locked out to protect against accidental or inadvertent operation, when operation could cause injury to personnel. Locks are to be applied and removed only by the authorized employee who is performing the servicing or maintenance.

No one should attempt to operate locked-out equipment.

Disciplinary action will be applied if any employee violates these procedures, regardless of whether or not physical harm or equipment damage results.

Lockout devices (padlocks) with an appropriate DANGER warning tag shall be used only for energy control. Prior to the servicing or maintenance of equipment a padlock and DANGER warning tag will be obtained from the Program Coordinator. Each padlock will be keyed differently with no master key or duplicate keys available.

6. TRAINING

Each authorized employee will be trained in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.

Each affected employee shall be instructed in the purpose and use of the energy control procedure.

- Affected employee. An employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or

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whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

- Authorized employee. A person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under the standard.

All other employees who do not work in areas where lockout may be used will be provided a brief overview of the lockout program.

Training in lockout will be given to all new employees as a part of their orientation. Retraining will be conducted whenever there is a change in job assignment, a change in machinery or equipment or process change that presents a new hazard.

7. LOCKOUT PROCEDURES

A. SEQUENCE OF LOCKOUT:

B. The following are specific procedures to be followed for lockout.

1. Notify the Program Coordinator, SAM CARANAGALAN (555-022071).
2. Notify all affected employees that lockout is going to be utilized, and the reason why.
3. If the machine/equipment is in operation, shut it down by the normal shutdown procedure.
4. Operate the appropriate switch, valve, etc., so that the machine/equipment is isolated from the energy source.
5. Lock the energy isolating devices, using assigned locks and danger tags.
6. Release, restrain, or dissipate any stored energy.
7. Verify that energy isolation is complete, by attempting to start the affected machinery or equipment in the normal manner.
8. After testing, return all operation controls to the "neutral" or "off" positions.

C. RESTORATION TO NORMAL:

1. After service or maintenance is complete, check the area to ensure that no employees are exposed.
2. Remove all tools and repair equipment.
3. Ensure that all guards have been replaced and all safety interlocks reactivated (if so equipped).
4. Verify that the operating controls are in the "off" or neutral position.
5. Remove all lockout and tag devices and activate the energy isolation devices to restore energy.

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8. EMPLOYEES TRAINING




- 8.1 All new ELITE employee / contractor must undergo a Control of Hazardous Energy (LO/TO) training in a classroom and in a visual presentation.
- 8.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Control of Hazardous Energy (LO / TO)standard.
- 8.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.
- 8.4 Annual training/refresher will be conducted and evaluated to maintain employees knowledge and awareness with regards to ELITE Control of Hazardous Energy (LO / TO) standard.
- 8.5 English and Spanish training are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Control of Hazardous Energy (LO / TO) standard.

9. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	WORKPLACE FIRST AID	HES 020
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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	WORKPLACE FIRST AID	HES 020
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this standard is to develop a written procedure in providing an initial attention to an ELITE CONSTRUCCIONES SL employee or contractor suffering an injury or illness. First aid in the workplace has a number of benefits:

- It can save lives;
- It can prevent permanent disablement;
- It can improve safety awareness and thereby prevent injury and illness in the workplace;
- It can place the incident on record for future reference if required;
- It can assist early return to work and rehabilitation.

3. SCOPE

The scope of this standard is to present a summary of the basic elements for a first-aid program at the workplace. Those elements include:

- Identifying and assessing the workplace risks that have potential to cause worker injury or illness.
- Designing and implementing a workplace first-aid program that:
 - ✓ Aims to minimize the outcome of accidents or exposures
 - ✓ Complies with OSHA requirements relating to first aid
 - ✓ Includes sufficient quantities of appropriate and readily accessible first-aid supplies and first-aid equipment, such as band ajes and automated external defibrillators.
 - ✓ Assigns and trains first-aid providers who:
 - receive first-aid training suitable to the specific workplace
 - Receive periodic refresher courses on first-aid skills and knowledge.
- Instructing all workers about the first-aid program, including what workers should do if a coworker is injured or ill.
- Providing for scheduled evaluation and changing of the first-aid program to keep the program current and applicable to emerging risks in the workplace, including regular assessment of the adequacy of the first-aid training course.

4. RESPONSIBILITY

4.1 The General Manager to provide necessary support to achieve the purpose of this standard.

4.2 The HSE Department Head to ensure that programs are reviewed and properly implemented.

4.3 Nominated First Aid Officer encompasses:

- the provision of a service for the emergency treatment of injuries or illness

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- arranging prompt and appropriate referral of casualties to medical aid as required
- recording treatments and reporting incidents
- the maintenance of first aid facilities, including first aid equipment, and keeping clean, checking and restocking first aid kits
- Keeping up to date lists of Nominated First Aid Officers, their contact numbers and locations, and information on what to do in a medical emergency prominently displayed in the building.

4.4 Workers /and Contractor is responsible to notify immediately to his/her supervisor any incident that requires first aid responses.

5. FIRST AID FACILITIES

5.1 DETERMINING NUMBERS AND LOCATIONS OF FIRST AID KITS

First aid kits should be located close to all work areas where there is a likely risk of injuries or illness occurring. First aid kits should be:

- easily accessible during the normal working hours of the area
- located in supervised areas – to reduce opportunities for pilfering as kits should not be locked during normal working hours (although they must be capable of being locked)
- located if possible close to running water, toilets and a private area that can be used for treatment
- Clearly visible and signposted with a standard safety sign consisting of a white cross on a green background.

6. FIRST AID EMERGENCY PROCEDURES

6.1 Reporting Injuries

All injuries incurred at work should immediately be reported to the worker’s supervisor. The supervisor must complete an injury report, and if appropriate to the severity of the injury, arrange for the worker to be transported to a medical care facility.

6.2 Assessment of the Injury Prior to Giving Care

Nominated First Aid Officers should immediately assess the situation and call an ambulance for all serious injuries and illnesses, and commence first aid. If the NFAO assesses that the injured or ill person needs further medical treatment following first aid treatment, they should refer the person to medical attention.

6.3 Assessing the Scene and the Victim(s)

- Assessing the scene for safety, number of injured, and nature of
- the event;
- Assessing the toxic potential of the environment and the need for respiratory protection;

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- Establishing the presence of a confined space and the need for respiratory protection and specialized training to perform a rescue;
- Prioritizing care when there are several injured;
- Assessing each victim for responsiveness, airway patency(blockage), breathing, circulation, and medical alert tags;
- Taking a victim’s history at the scene, including determining the mechanism of injury;
- Performing a logical head-to-toe check for injuries;
- Stressing the need to continuously monitor the victim;
- Indications for and methods of safely moving and rescuing victims;
- Repositioning ill/injured victims to prevent further injury.

6.4. Responding to Life-Threatening Emergencies

- Establishing responsiveness;
- Establishing and maintaining an open and clear airway;
- Performing rescue breathing;
- Treating airway obstruction in a conscious victim;
- Performing CPR;
- Recognizing the signs and symptoms of shock and providing first aid for shock due to illness or injury;
- Assessing and treating a victim who has an unexplained change in level of consciousness or sudden illness;
- Controlling bleeding with direct pressure;
- Poisoning
 - Ingested poisons: alkali, acid, and systemic poisons.
 - Inhaled poisons: carbon monoxide; hydrogen sulfide; smoke; and other chemical fumes, vapors, and gases. Assessing the toxic potential of the environment and the need for respirators;
 - Knowledge of the chemicals at the worksite and of first aid and treatment for inhalation or ingestion;
 - Effects of alcohol and illicit drugs so that the first-aid provider can recognize the physiologic and behavioral effects of these substances.
- Recognizing asphyxiation and the danger of entering a confined space without appropriate respiratory protection. Additional training is required if first-aid personnel will assist in the rescue from the confined space.
- Responding to Medical Emergencies
 - Chest pain;
 - Stroke;
 - Breathing problems;
 - Anaphylactic reaction;
 - Hypoglycemia in diabetics taking insulin;
 - Seizures;
 - Pregnancy complications;
 - Abdominal injury;
 - Reduced level of consciousness;
 - Impaled object.

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6.5 Responding to Non-Life-Threatening Emergencies

- Wounds
 - Assessment and first aid for wounds including abrasions, cuts, lacerations, punctures, avulsions, amputations and crush injuries;
 - Principles of wound care, including infection precautions;
 - Principles of body substance isolation, universal precautions and use of personal protective equipment.
- Burns
 - Assessing the severity of a burn;
 - Recognizing whether a burn is thermal, electrical, or chemical and the appropriate first aid;
 - Reviewing corrosive chemicals at a specific worksite, along with appropriate first aid.
- Temperature Extremes
 - Exposure to cold, including frostbite and hypothermia;
 - Exposure to heat, including heat cramps, heat exhaustion and heat stroke.
- Musculoskeletal Injuries
 - Fractures;
 - Sprains, strains, contusions and cramps;
 - Head, neck, back and spinal injuries;
 - Appropriate handling of amputated body parts.
- Eye injuries
 - First aid for eye injuries;
 - First aid for chemical burns.
- Mouth and Teeth Injuries
 - Oral injuries; lip and tongue injuries; broken and missing teeth;
 - The importance of preventing aspiration of blood and/or teeth.
- Bites and Stings
 - Human and animal bites;
 - Bites and stings from insects; instruction in first-aid treatment of anaphylactic shock.

7. REQUIRED TRAINING AND RECORD-KEEPING

First Aid training is typically provided by HSE or Risk Management personnel, certified as instructors. Instructors require that trainees be retrained in First Aid and certified every three years. For employees who receive CPR-AED training, retraining and certification occur annually.

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OSHA has defined certain workers as requiring First Aid and CPR training. These include electrical workers, those involved in hazardous waste operations, and those who work in certain confined spaces.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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2. PURPOSE

The purpose of this safety alert is to remind ELITE crane operators, and other workers involved in crane operation, of their safety obligations when operating mobile cranes.

The safety alert identifies some of the most common issues that must be addressed when carrying out a lifting operation.

3. SCOPE

This standard applies to all ELITE workers involved in crane operation in all ELITE work site areas.

The scope of this standard includes:

- Equipment Selection
- Pre-Start-Inspection
- Safe Operating Procedures
- Inspection and maintenance

4. ROLES & RESPONSIBILITY

4.1 The General Manager in collaboration with HSE Department head authorize and designates qualified/ competent crane operator. And, ensure that all procedure and standards written herein are properly observed.

4.2 The HSE Department Head provides compliance assistance to the General Manager.

Investigates accidents and incidents involving mobile cranes and identifies corrective actions.

4.3 Crane operator:

- Are knowledgeable of applicable standards, capable of identifying existing and predictable hazards, and have authorization to take prompt corrective measures.
- Certification from a nationally accredited crane operator testing organization (must be renewed every 5 years), and
- Authorized by General Manager.
-

4.4 Qualified Rigger is a person that:

- Possesses a recognized degree, certificate, or professional standing, or
- Has extensive knowledge, training, and experience, and
- Can successfully demonstrate the ability to solve problems related to rigging loads.

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One of the following options must be used to ensure a rigger is qualified:

- The Qualified Rigger has documentation from a third party qualified evaluator showing that he or she meets the qualification requirements; or
- The General Manager or his designee determines if the individual meets the qualification requirements, and provides documentation of that determination.

4.5 Signal Person is required when:

- The point of operation is not in full view of the operator;
- The operator's view is obstructed in the direction the equipment is traveling; and/or
- Either the operator or the person handling the load determines that a Signal Person is needed because of site-specific safety concerns.

One of the following options must be used to ensure a signal person is qualified:

- The Signal Person has documentation from a third party qualified evaluator showing that he or she meets the qualification requirements; or
- The General Manager or his designee determines if the individual meets the qualification requirements, and provides documentation of that determination.

5. CRANE STANDARD OPERATING PROCEDURES

5.1 Planning Stage

5.1.1 Equipment Selection, following concerns should be considered completely:

- Does the crane have adequate lifting capacity to safely perform the lift?
- Is the crane type suitable for the lift (i.e. adequate space, ground conditions, accessibility, visibility, etc)?
- Does the actual site layout agree with the information provided when the crane was ordered?
- Does the crane have the correct number of counterweights?
- Is the crane rigged with the correct number of rope falls?
- Is there a diagram that shows the position of the crane and load to be lifted? **Note:** this is particularly important with heavy and complex lifts including tilt-up, dual lifts, etc.
- If tilt-up panels are to be lifted, has allowance in the crane's capacity been made for the panel tilt?
- Have clearances for the crane's counterweight been considered when operating around tilt-up panel braces?

5.2 Pre-Start Inspection

When the crane arrives on site, the following documents should come along with the crane for inspection and review when requested:

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- A valid certificate of Test/ Thorough Visual Examination of lifting Equipment for the mobile crane.
- A valid certificate of Test/ Thorough Visual Examination of lifting Equipment for all **lifting gears** that comes with the crane the mobile crane.
- The log-book or log sheet for the recording of the operational tests carried out by the operator before the start of every work shift.

5.3 Planning and Supervision

All lifting operation should be properly planned by a competent person before the actual execution and not left solely to the crane operator. Careful planning is especially critical for difficult lifts such as pick and carry operations, tandem lifting, and tilt-up operation and are considered critical lift. Critical lift required a written lifting plan (Annex A) before the lifting operation will commence.

5.4 Safe Operating Procedures

- Crane operators shall not engage in any practice that will divert their attention while operating the equipment.
- Operators, riggers, and signal persons must wear personal protective equipment, including hard hats and safety shoes when conducting hoisting activities and working within the lifting radius.
- Prior to operating a mobile crane, the operator must make a complete walk around the equipment to ensure that people are clear of the equipment, all equipment is in a safe condition, and to identify any overhead electrical hazards.
- Confirm safe site conditions - checking for hazardous weather, excessive wind, and icing.
- Verify that ground conditions at work locations are firm, stable, drained, graded and provide adequate support. Ensure blocking is stable, adequately supported, and of sufficient strength.

5.4 Safe Operating Procedures

- Barricades, warning signs or other methods must be used to prevent entry into a lift area or turn radius of the crane. Traffic patterns and pedestrian safety must be considered.
- All controls must be tested by the operator prior to operating the equipment. Any malfunctions must be corrected or repaired before operating the crane.
- Operators will respond to signals only from a trained Signal Person.
- All loads must be rigged by a Qualified Rigger.

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- The operator is responsible to secure any unattended hoisting equipment.
- At no time shall persons work under a suspended load and suspended loads shall not be left unattended without proper safeguards.
- Rigging design and hoisting procedures should conform to OSHA requirements. For critical lifts, a critical lift plan must be developed and followed.
- Whenever there is any doubt as to safety, the operator has the authority and obligation to stop all hoisting activities and refuse to handle loads until safety has been assured.

6. INSPECTION AND MAINTENANCE

Each mobile crane shall be maintained according to the manufacturer’s specifications and inspected according to OSHA’s required schedule (29 CFR 1926.1412) by a qualified inspector. Any deficiencies must be corrected before use. Inspections include:

6.1 Before each use - cranes must be visually inspected by the operator to make sure it is in safe operating condition, and all controls tested in accordance with 29 CFR 1926.1412(d).

Inspections by operators prior to use should include the following:

1. Verification that the crane or hoist has not been removed from service.
2. Testing to confirm that control devices, limit switches, and brakes are functional. At the beginning of each operator's shift, the upper limit switch of each hoist shall be tried out under no load. Extreme care shall be exercised; the block shall be "inched" into the limit or run in at slow speed. If the switch does not operate properly, notify a supervisor and do not use the crane/hoist. Visual inspection that guards are secured in place.
3. Visual inspection of hooks for damage, cracks, nicks, gouges, deformations of the throat opening, wear on saddle or load bearing point, and twist. If a hook latch is required, check for proper operation.
4. Visual inspection of ropes and chains for frays, broken strands, kinks, nicks, gouges, stretching, or other deformation or damage. Verify proper seating.
5. Verify proper lubrication, as applicable. Check for signs of motor failure, or oil leakage on the crane and on the floor beneath the crane.
6. Check for any unusual sounds from the crane or hoist mechanism.
7. Check that warning and other safety labels are not missing and are legible.

6.2 Monthly – documented inspection in accordance with 29 CFR 1926.1412(e). Monthly inspections can be conducted by qualified persons designated by the department. Monthly inspections should be documented; include all items described for the daily inspections.

6.3 Annual/Comprehensive - documented inspection in accordance with 29 CFR 1926.1412(f). Annual inspection shall be conducted by a third party inspector. Inspector shall be a qualified person. A *qualified person* is defined in the rules as “a person who by possession of a

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recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project.”

6.4 *Equipment not in regular use* – equipment that has been idle for three (3) months or more must have a documented inspection according to 29 CFR 1926.1412(e) before it can be returned to service.

7. EMPLOYEES TRAINING

7.1 Classroom and visual presentation are the method use to share the information.

7.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Mobile Crane Operation Safety procedure.

7.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

7.4 Annual training/refresher will be conducted and evaluated to maintain employee’s knowledge and awareness with regards to ELITE Mobile Crane Operation Safety procedure.

7.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Mobile crane operation safety procedure presentation.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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2. PURPOSE

As part of its goal to provide a safe and healthful workplace, the ELITE CONSTRUCCIONES SL (EC SL) is promulgating this procedure to reduce the potential of fall hazards associated with work on unguarded horizontal and vertical work surfaces (e.g., towers and roofs). The purpose of this procedure is also to specify practices and training for the safety of ELITE employees while working on elevate surfaces and ladders. ELITE employees who work at heights of six (6) feet or grater are required to attend training on fall protection. Additionally, those employees working on aerial platforms, scissors lifts or other elevated platform equipment must receive training on the use of such equipment.

3. SCOPE

This procedure applies to all ELITE CONSTRUCCIONES SL facilities and work locations that perform any duties on an any elevated work surfaces where there is a fall hazard of six feet or more to a lower level and to all EC SL employees who use fall protection in the performance of their jobs.

4. RESPONSIBILITY

4.1. Risk Management and Safety shall;

4.1.1. Develop and maintain the written Fall Prevention Program. Risk

Management and Safety will re-evaluate this program periodically and will base the need for changes upon suggestions by employee sand their supervisors, accidents and near miss incidents that have been recorded.

4.1.2. Provide necessary training, which will primarily consist of elevated platform safety, scaffolding safety, ladder safety and personal fall arrest system safety for those affected employees.

4.1.3. Serve the role of technical support and consultation to departments of affected employees to interpret requirements and establish safe practices.

4.2. Site Supervisors shall;

4.2.1. Recognize potential fall hazards based on this policy, notifying

Risk Management and safety of each fall hazard that their employees may face and to involve their affected employees in this program.

4.2.2. Notify Risk Management and Safety of the need for appropriate training, such as ladder safety, scaffolding safety and personal fall arrest system safety.

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4.2.3. Evaluate, on an annual basis, the effectiveness of the program as it applies to the work that their affected employees perform and to provide Risk Management and Safety with their conclusions, compliance challenges and recommendations.

4.2.4. Contact Risk Management and Safety for technical support when questions arise regarding compliance and safe procedures.

4.2.5. Ensure that proper safety equipment is supplied to their affected employees where needed, such as fall arrest systems, scaffolding, proper ladders, guard railings, toe kicks, etc.

4.2.6. Ensure that their affected employees perform applicable pre-work check lists and inspections and to maintain the records of the completed check lists for at least one year.

4.2.7. Ensure that all work places are safe to perform the work that their affected employees are expected to conduct. To prevent slipping, tripping and falling, all locations where fall hazards are present must be kept clean, dry (where possible) and orderly. Where wet processes are used, drainage will be maintained, and false floors, platforms, mats, or other dry standing places are provided where practicable.

4.3 Affected Employees shall;

4.3.1. Follow the program requirements outlined in this policy and standard procedures required by their department for the work activities they are involved with.

4.3.2. Notify their supervisor when questions arise surrounding safe procedures, the need for fall prevention equipment, personal protective equipment and difficulties complying with requirements.

4.3.3. Attend any fall prevention training that is required of them.

4.3 Affected Employees shall; (cont'd)

4.3.4. Report all accidents and near misses that they witness or incur. This will help the ELITE CONSTRUCCIONES SL to improve safe practices.

4.3.5. Perform checklist inspections outlined in this written program prior to conducting work activities.

5. DEFINITIONS

Anchorage. A secure point of attachment for personal fall arrest equipment (e.g., lifelines, lanyards or deceleration devices), capable of supporting impact loading of 5,000 pounds per attached employee or shall be designed and installed under the supervision of the

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Qualified Person. If designed, it must be part of a complete personal fall arrest system that maintains a safety factor of at least two while limiting maximum arresting force on an employee to 1800 pounds.

Competent Person. Person who (1) is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees and (2) has authority to take prompt corrective measures to eliminate or protect against those hazards. The scope of competency varies. A person may be competent in one discipline and not another.

Connector. A device which is used to connect part of the personal arrest system, positioning or restraint systems together. It may be an independent component such as carabineer or it may be integral component of body harness (D-rings) or lanyard (snap-hooks).

Construction Work. Construction, installation, alteration, and/or repair of facilities and/or ancillary equipment.

Environmental Hazards. Environmental issues such as, but not limited to high winds, presence of contaminants on structures that could cause the employee to loose his/her grip or footing when working at heights.

Fall Restraint System. A system designed to prevent the worker from reaching an area in which a free fall could occur. Thus, no free fall is possible (e.g., roof work).

Full Body Harness. A design of multiple adjustable straps that can be secured around the body, having multiple D-rings as means for attaching carabineer's, lanyards or other devices suitable for fall arrest, work positioning or restraint. The back (dorsal) D-ring is used for fall arrest or restraint, the front D-ring is used for work positioning or ladder climbing, and side D-rings are used for restraint and for work positioning.

Guardrail system. A vertical barrier erected along exposed edges of walking/working surfaces to prevent falls of persons to lower levels or the ground. A standard guardrail consists of top rail, mid rail, and posts, and shall have a vertical height of 42 inches plus or minus three (3) inches from the upper surface of top rail to floor, platform, runway, or ramp level. Nominal height of mid rail shall be at least 21 inches.

Guarded Roof Edge. A roof edge that is guarded by a parapet or similar structure with a minimum height of 39 inches.

Horizontal Lifeline. A component consisting of a flexible line for connection to anchorages at both ends to stretch horizontally and which serves as a means for connecting other components of a personal fall arrest system to the anchorage. Horizontal lifelines and their anchorage strength must be designed only by a Qualified Person (Professional Engineers are often used as qualified personnel).

Ladder Safety (Climbing) Systems. A fall arrest system that safeguards a worker while climbing or descending structures such as fixed ladders, small towers, poles. It consists of

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either a flexible steel cable or a rigid rail, mounting brackets, and a safety sleeve. The safety sleeve attached to the vertical cable/rail and worker's harness automatically follows the worker's movement and locks onto the cable/rail when a fall occurs.

Low-Sloped Roof. A roof having a slope less than four vertical inches in twelve horizontal inches.

Maintenance. Making or keeping a structure, equipment, fixture or foundation (substrates) in proper condition in a routine, scheduled or anticipated fashion.

Opening. A gap or void 30 inches (76 cm) or more high and 18 inches (48cm) or more wide, in a wall or partition, through which employees can fall to a lower level.

Personal Fall Arrest System. A system used to arrest a worker in a fall from a working level. It consists of an anchorage, connectors, a full body harness, shock absorbing lanyard and may include deceleration device, lifeline, or suitable combinations of these.

Positioning Device System. A system that holds and sustains the worker on an elevated vertical consists of a full body harness, connecting assembly (e.g., positioning lanyard), connectors, and anchorage.

Positioning Lanyard. A flexible line of webbing with connectors (snap-hooks) on both ends that connect to a worker harness's side D-rings. It must be rigged such that a worker cannot free fall more than two feet.

Qualified Person. One with a recognized degree, professional certificate, or professional standing, or who by extensive knowledge, training and experience has successfully demonstrated the ability to solve or resolve problems related to the subject matter of the work or the project.

Rope Grab. A mobile or static deceleration device attached to a vertical rope lifeline that automatically by friction locks onto the rope so as to arrest the fall of an employee.

Safety Net. A fall arrest system that uses nets to arrest falling persons before they would contact a lower level or obstruction.

Self-Retracting Lifeline. A connecting means that automatically adjust its length as the user moves towards and away from the anchorage. The self-retracting lifeline housing typically contains a spring loaded drum on which line (made of rope, wire rope and webbing) is wound and unwound. The device has a mechanism that locks the drum if the user falls.

Snap-hook. A connector having a hook-shaped body with a normally closed gate that opens by depressing an opening/locking mechanism and automatically closes when pressure is released.

Shock (Energy) Absorber. A component that is designed to dissipate kinetic energy and limits forces imposed on a worker during fall arrest to 900 pounds.

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Shock Absorbing Lanyard. A flexible line of webbing, cable, or rope that has an integral shock absorber and connectors at each end for connecting a worker’s harness to a lifeline or anchorage.

Steep Roof. A roof having a slope greater than four vertical inches to twelve horizontal inches.

Unguarded Roof Edge. Any side or edge of the roof where there is no wall or guardrail system at least 39 inches high.

Vertical Lifeline. A component consisting of a flexible line for connection to an anchorage at one end to hang vertically and which serves as a means for connecting other components of a personal fall arrest system to the anchorage. The lifeline shall have a nominal breaking strength of 5,000 pounds.

Warning Line System. A system of ropes, wires, or safety chains to warn and keep workers away from a fall hazard. The distance between the warning and the hazard will depend on type of work.

Work Positioning System. Any system or combination of components that holds a worker in position for hands-free operations.

Work Positioning Assembly. A system designed for work positioning. Typically consists of a positioning lanyard connected to positioning D-rings of a harness.

Y Lanyard. (100% Tie-Off). Two-legged lanyard with an integral shock absorber, which allows worker to be tied off to one anchorage point all the time even when moving from one location to another. Each leg is terminated by a connector (snap-hook or carabiner) and a center connector (usually snap-hook) attaches to a back (dorsal) D-ring of a worker’s harness.

6. FALL PROTECTION PROCEDURES

6.1 General. Fall protection systems (e.g., guardrails, railings, safety nets, personal restraint and fall arrest systems, positioning systems, temporary scaffolding) are required under the following conditions:

6.1.1. When potential fall distance is six feet or more (e.g., towers, and unguarded roofs).

6.1.2 When potential fall distance is 6 feet or less under particularly hazardous circumstances (e.g., working over objects or equipment imposing an impalement hazard).

6.2 Fall Protection Safe Work Practices. An effective fall protection program starts with preplanning which includes identifying locations, equipment, techniques, the people, and emergency response. All locations with work areas above six feet shall be assessed for fall hazards including environmental hazards such as wind, rain, etc. Fall hazards can be controlled by using appropriate fall protection solutions. The hierarchy of Fall Protection should be

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applied to any fall hazards in order to identify the best solution for a specific situation. In order of best to worst these solutions are:

- Hazard Elimination (engineering controls)
- Traditional Fall Protection (guardrails, covers, barriers)
- Fall restraint (roof restraint systems)
- Fall Arrest System (towers, vertical structures)
- Work procedures

6.3 Fall Hazards

There are a number of potential situations or conditions that can present a fall hazard. This policy may not specifically address all possibilities. Therefore, when employees or supervisors recognize a condition that may present a fall hazard not specifically addressed by this written.

The following list of conditions addressed by this written program (note that this is not an all-inclusive list):

6.3 Fall Hazards (cont'd)

6.3.1. Ladders, both permanent and temporary

Ladders shall exhibit the following conditions:

1. Meet OSHA specifications for design and safety.
2. The appropriate type of ladder is being used for the job.
3. Metal ladders are not used near exposed electrical sources.
4. All parts, ropes, fittings and connections are secure and in good condition.
5. Non-slip surfaces are in place on ladder rungs.
6. Gripping safety feet are in place, secure and in sound condition.
7. Ladder has been set up safely:
 - a) Floor/ground surface is firm.
 - b) Floor/ground surface is flat.
 - c) Floor/ground surface is not slippery.
 - d) Ladder is level.
 - e) Top of ladder (unless using step ladder) is against a solid, fixed surface and extending at least three (3) feet above.

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f) For extension ladders, the 4-to-1 principal is accomplished (the base of the ladder should be placed at a distance from the wall that is equal to one fourth of the height that the ladder is extended. i.e.; a ladder that is extended 20 ft high should have its base approximately 5 ft. from the wall).

g) When employees are on extension ladders at heights of 20 feet or higher, either a second person is present to steady

the ladders base or the top of the ladder is effectively tied off to a sound anchor point.

6.3.2 Stairs (permanent and temporary)

All stairs shall exhibit the following conditions:

1. Meet OSHA specifications for design and safety.
2. All required covers or guardrails are in place, including top rails, mid-rails and toe kicks or spindles.
3. All hand rails or guardrails are in place.
4. All treads and risers are in good repair.
5. Non-slip surfaces are in place.
6. Adequate headroom is maintained above.
7. Stairs are clear of clutter and slippery materials.

6.3.3. Elevated Platforms that are fixed

All elevated platform locations shall exhibit the following conditions:

1. Top guard rail in place, is between 36 and 45 inches from floor, is in sound condition and anchored appropriately.
2. Vertical rails (spindles), a solid surface or a mid-rail is in place, is in sound condition and is anchored appropriately.
3. If the railing is not solid down to the floor, a toe kick is present, in sound condition and anchored appropriately.
4. The flooring of the platform has no openings, is properly attached to sound surface and is in sound condition.
5. Walking surfaces are clear from obstruction and are not slippery.

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6.3.4. Scaffolding

Once erected, scaffolding is an elevated platform and shall meet the same safety requirements. However, due to the complexity of parts and connections, and due to the fact that they are routinely assembled and disassembled, they are far more complex and are potentially more dangerous. Therefore, all employees who erect or use scaffolding shall attend the Scaffold Safety Training Program sponsored by Risk

Management and Safety prior to working with or on scaffolding.

See ELITE HSE 009 (Scaffolding Standard) of this written program for specific requirements relating to scaffolding.

6.3.5 Floor and wall openings

All floor and wall openings that lead to a fall hazard shall exhibit the following conditions:

1. All floor and wall openings are safely covered or blocked from access.
2. If not safely covered or blocked from access, someone is assigned for constant attendance to it.
3. Covers shall be sound, solid and not easily opened.

6.3.5 Floor and wall openings (cont'd)

4. Barricades that are designed to prevent someone from falling into the opening shall be visually noticeable, strong enough to hold the weight of multiple people and shall not, in themselves, have additional openings that create additional fall hazards. If the barricade is not solid from its top rail to the floor, they shall meet the requirements of a guardrail on an elevated platform (top rail, mid rail, toe board).

5. Floor surfaces surrounding the opening shall be clear of clutter or slippery material.

6.3.6 Working on an aerial platform lift at elevations greater than 6 feet in height.

Any time an employee works at elevations higher than 6 feet above the floor they shall use an appropriate ladder, an aerial platform lift, and scaffolding or assemble an appropriate elevated platform whenever feasible. If these are not feasible, the employee shall be trained in the proper use of fall arrest systems and don their arrest systems appropriately throughout the duration of time that they work above 6 feet

7. FALL PROTECTION TRAINING PROGRAMS

	FALL PROTECTION	HES 022
	<i>Document Title</i>	<i>Document No.:</i>

The Safety Department will sponsor all fall prevention related training programs for ELITE employees who require the need. The site supervisors shall notify Risk Management and Safety of the need for training, which will include new hires and existing employees whose job has changed to require such training. Fall Protection training/refresher are conducted annually and records will be maintained by ELITE Safety Department.

The following training programs will be provided as needed:

- A. Scaffold Safety: For all employees who erect or use scaffolding.
- B. Fall Arrest System Safety: For all employees who use fall arrest systems.
- C. Ladder Safety training will take place periodically for departments who frequently use ladders.
- D. Note that aerial platform lift training, though not a part of this fall prevention written program, is also provided and mandated for all employees who operate or ride on aerial platform lifts (see Aerial Platform Lift Policy).

8. SPECIFIC REQUIREMENTS REGARDING PERSONAL FALL ARREST SYSTEMS

Different types of personal fall arrest systems are chosen depending on the nature of the work and the specific conditions present in the area where the work will take place.

8.1. Three basic types of personal fall arrest systems include:

1. Personal Fall Arrest system – A system used to stop a fall once it has begun. This system shall include an anchorage, full body harness, lanyard, locking snap hooks, lifeline and anchorage connector, and it may include a descent control device.
2. Positioning Device System – A system that prevents falls by supporting the employee in a working position. This system supports the employee, therefore, eliminating the chance for a fall to begin. These systems may include a body belt, harness, connector, locking snap hook and proper anchorage.
3. Personal Fall Protection Systems for Climbing Activities – A system that protects the employee while he/she is climbing. This system anchors at a point that usually adjusts and moves with the climber.

8.2. Equipment anchorage, tie off and use

Anchoring your fall arrest system is critical. The selection of the anchoring point should be made carefully and when the employee is uncertain about the anchoring point he/she is expected to consult with a supervisor or Risk Management and Safety. Anchoring points must be permanent, fixed objects that are rated to hold forces several times the person's weight, including the weight of the equipment they will have with them. There are other criteria necessary for an adequate anchorage point that shall be covered in training. When tying off,

	FALL PROTECTION	HES 022
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the employee shall tie off at such a location where there are no obstacles in the potential path of a fall and shall allow no more than 6 feet of free-falling distance (however, 2-4 ft of free falling distance is recommended). In addition to the free falling distance, the employee shall know and account for the additional deceleration distance of the fall arrest system they are using. The employee shall complete the anchoring tie off and equipment tie off procedures that are specified by the fall arrest system manufacturer PRIOR to getting into a position where he/she could fall.

8.3 Body Belts and Harnesses

Only full-body harnesses that are approved by Risk Management and Safety may be used. All equipment manufacturer’s procedures shall be met. Harnesses can be attached either in the center of the back at shoulder level or above the head. The employee must use the following procedure to put their full-body harness on:

1. Inspect your full-body harness before putting it on.
2. Hold the harness by the back D-ring and shake the straps into place.
3. Release buckled straps and slip them over your shoulders with the D-ring in back.
4. Pull the leg strap between your legs and connect it to the opposite end.
5. Waist strap should be tight but not binding.
6. Connect chest strap and position it in the middle of your chest.
7. Check that the harness is snug but allows full movement.

9. INSPECTION AND MAINTENANCE

To ensure that fall protection systems are ready and able to perform their required tasks, a program of inspection and maintenance will be implemented and maintained. The following as a minimum, will comprise the basic requirements of the inspection and maintenance program:

9.1 Equipment manufacturer’s instructions will be incorporated into the inspection and preventive maintenance procedures.

9.2 All fall protection equipment will be inspected prior to each use, and a documented inspection at intervals not to exceed 6 months, or in accordance with the manufacturers guidelines.

9.3 The user will inspect his/her equipment prior to each use and check the inspection date.

9.4 Any fall protection equipment subjected to a fall or impact load, will be removed from service immediately and inspected by a qualified person (sent back to the manufacturer).

9.5 Check all equipment for mold, damage, wear, mildew, or distortion.

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9.6 Ensure that no straps are cut, broken, torn or scraped.

9.7 Special situations such as radiation, electrical conductivity, and chemical effects will be considered.

9.8 Equipment that is damaged or in need of maintenance will be tagged as unusable, and **will not be stored** in the same area as serviceable equipment.

9.9 Ladders, Mobile Ladder Stands and Scaffolding shall meet or exceed the National and/or local regulatory requirements.

9.10 Color coding tag inspection shall be used to eliminate misuse of fall arrest equipment. Please see attached Appendix a(Lifting and fall arrest Equipment Inspection Color code)

10. EMPLOYEES TRAINING

10.1 Classroom and visual presentation are the method use to share the information.

10.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Fall protection procedure.

10.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

10.4 Annual training/refresher will be conducted and evaluated to maintain employee's knowledge and awareness with regards to ELITE Fall Protection procedure.




10.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Fall Protection procedure presentation.

11. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	INCIPIENT FIRE FIGHTING	HES 023
	<i>Document Title</i>	<i>Document No.:</i>

1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

NOTE:

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	INCIPIENT FIRE FIGHTING	HES 023
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this program is to educate ELITE CONSTRUCCION SL employee to be prepared and be able to evaluate or fight a small fire.

3. SCOPE

This procedure applies to all ELITE CONSTRUCCION SL facilities and work locations that have a potential source of fire or to an incipient fire incident.

This written procedure includes but not limited to:

- General Information
- Types of Fire Extinguishers
- Location and Placement of Fire Extinguisher
- Assessment of Fire Incident
- Fire and Extinguisher Operation
- Inspection of Fire Extinguisher

4. RESPONSIBILITY

4.1. General Manager to ensure that Incipient Fire Training Program are updated and properly implemented. Make sure that all resources needed for this program are provided.

4.2 HSE Management shall review Incipient Fire Training Program. Ensure that all affected employees undergone this program. To keep the employees list updated and monitor the performance of this standard.

4.2. Site Supervisors shall notify HSE management to involve affected employees in this program. Make sure that affected employees completed this training before commencing any works that may involve potential source of fire.

4.3. Affected Employees are responsible for following the program requirements outlined in this policy and standard procedures required by their department for the work activities they are involved with. Attend any incipient fire training that is required of them. Report all fire incident immediately to their immediate supervisor.

5. GENERAL INFORMATION

Portable fire extinguishers can be very effective for fighting fires in their incipient stages. A person who is well-trained in fire-extinguisher use can save both lives and property. Portable fire extinguishers must be available even when other firefighting measures are available. For extinguishers to be effective in a fire situation, proper selection, inspection and maintenance are essential.

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Fire extinguishers can represent an important segment of any overall fire protection program. However, their successful functioning depends upon the following conditions having been met:

- (1) The fire extinguisher is properly located and in working order.
- (2) The fire extinguisher is of the proper type for a fire that can occur.
- (3) The fire is discovered while still small enough for the fire extinguisher to be effective.
- (4) The fire is discovered by a person ready, willing, and able to use the fire extinguisher.

6. TYPE OF FIRE EXTINGUISHERS

Type of extinguisher to be used depends on the classification of Fires according to the type of fuel or material:

- Class A — wood, paper and cloth;
- Class B — flammable gases, liquids and greases;
- Class C — fires in live electrical equipment, or involving materials near electrically powered equipment.
- Class D — combustible metals such as magnesium, zirconium, potassium and sodium.
- Class K — Fires in cooking appliances that involve combustible cooking media. (i.e. vegetable or animal oils and fats)

7. LOCATION AND PLACEMENT OF FIRE EXTINGUISHER

7.1 Distribution

7.1.1 Fire extinguishers shall be provided for the protection of the building and for the occupancy hazard contained therein:

- Required building protection shall be provided by fire extinguishers suitable for Class A.
- Protection against occupancy hazard shall be provided by fire extinguishers suitable for such Class A, B, C, or D fire potentials as may be present.

7.1.2 Distances

The distance between extinguishers and the associated hazard depends on the fire hazard classes present:

- Class A- 75 feet
- Class B- 50 feet
- Class C- 75 to 50 feet, based on appropriate A or B hazard
- Class D- 75 feet
- Class K- 30 feet

7.2 Mounting

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Extinguishers shall be conspicuously located where they will be readily accessible in the event of fire. They shall be located along normal paths of travel, including exits from an area. For situations where extinguishers are mounted within a cabinet or recess and are not readily visible, locations will be indicated by a light above the cabinet location. Additional signage may also be warranted. Fire protection and fire detection equipment shall not be obstructed in any situation.

Height of mounting depends on the weight of the extinguisher as follows:

- Less than 40 pounds: top no more than 5ft off floor
- Greater than 40 pounds: top no more than 3.5ft
- 4" minimum distance from floor for all


8. ASSESSMENT OF FIRE INCIDENT

Portable fire extinguishers have two functions: to control or extinguish small or incipient stage fires and to protect evacuation routes that a fire may block directly or indirectly with smoke or burning/smouldering materials.

To extinguish a fire with a portable extinguisher, a person must have immediate access to the extinguisher, know how to actuate the unit, and know how to apply the agent effectively. Attempting to extinguish even a small fire carries some risk. Fires can increase in size and intensity in seconds, blocking the exit path of the fire fighter as well as create a hazardous atmosphere. In addition, portable fire extinguishers contain a limited amount of extinguishing agent and can be discharged in a matter of seconds. Therefore, individuals should attempt to fight only very small or incipient stage fires.

Prior to fighting any fire with a portable fire extinguisher you must perform a risk assessment that evaluates the fire size, the fire fighters evacuation path, and the atmosphere in the vicinity of the fire.

Risk Assessment Question	Characteristics of incipient stage fires or fires that can be extinguished with portable fire extinguishers	Characteristics of fires that SHOULD NOT be fought with a portable fire extinguisher (beyond incipient stage) - evacuate immediately
Is the fire too big?	The fire is limited to the original material ignited, it is contained (such as in a waste basket) and has not spread to other materials. The flames are no higher than the fire fighter's head.	The fire involves flammable solvents, has spread over more than 60 square feet, is partially hidden behind a wall or ceiling, or cannot be reached from a standing position.

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Is the air safe to breathe?	The fire has not depleted the oxygen in the room and is producing only small quantities of toxic gases. No respiratory protection equipment is required.	Due to smoke and products of combustion, the fire cannot be fought without respiratory protection.
Is the environment too hot or smoky?	Heat is being generated, but the room temperature is only slightly increased. Smoke may be accumulating on the ceiling, but visibility is good. No special personal protective equipment is required.	The radiated heat is easily felt on exposed skin making it difficult to approach within 10-15 feet of the fire (or the effective range of the extinguisher). One must crawl on the floor due to heat or smoke. Smoke is quickly filling the room, decreasing visibility.
Is there a safe evacuation path?	There is a clear evacuation path that is behind you as you fight the fire.	The fire is not contained, and fire, heat, or smoke may block the evacuation path.

9. FIRE AND EXTINGUISHER OPERATION

9.1 Fire triangle

To understand how fire extinguishers work, you need to understand a little about fire. Fire is a very rapid chemical reaction between oxygen and a combustible material, which results in the release of heat, light, flames, and smoke.

For fire to exist, the following four elements must be present at the same time:

- Enough oxygen to sustain combustion,
- Enough heat to raise the material to its ignition temperature,
- Some sort of fuel or combustible material, and
- The chemical reaction that sustains fire

9.2 Fire extinguisher use

The following steps should be followed when responding to an incipient stage fire:

- Everyone is leaving or has left the building.
- Pull the fire alarm and call 911 or 9-4480.
- Identify a safe evacuation path before approaching the fire. Do not allow the fire, heat, or smoke to come between you and your evacuation path.
- Select the appropriate type of fire extinguisher.
- Discharge the extinguisher within its effective range using the **P.A.S.S.** technique (Pull, Aim, Squeeze, and Sweep).

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- Make sure you have a safe way out and can fight the fire with your back to the exit.
- Evacuate immediately if the extinguisher is empty and the fire is not out.
- Evacuate immediately and close the door if the fire progresses beyond the incipient stage.

Most fire extinguishers operate using the following P.A.S.S technique:

- PULL... Pull the pin. This will also break the tamper seal.
- AIM... Aim low, pointing the extinguisher nozzle (or its horn or hose) at the base of the fire.

Note: Do not touch the plastic discharge horn on CO2 extinguishers, it gets very cold and may damage skin.

- SQUEEZE... Squeeze the handle to release the extinguishing agent.
- SWEEP... Sweep from side to side at the base of the fire until it appears to be out. Watch the area. If the fire re-ignites, repeat steps 2 - 4.

If you have the slightest doubt about your ability to fight a fire....EVACUATE IMMEDIATELY

Important:

- **Never use water to extinguish flammable liquid fires.** Water is extremely ineffective at extinguishing this type of fire and may make matters worse by spreading the fire.
- **Never use water to extinguish an electrical fire.** Water is a good conductor and may lead to electrocution if used to extinguish an electrical fire. Electrical equipment must be unplugged and/or de-energized before using a water extinguisher on an electrical fire.

10. INSPECTION OF FIRE EXTINGUISHERS

Inspect units **monthly** to ensure good working condition and adequate protection. Rotate the fire extinguisher to keep chemical from caking. Have units inspected annually by a state certified individual. Inspection should cover these points:

- Are all extinguishers in their recommended location?
- Is there enough pressure to discharge the contents of the extinguisher (check the gauge)?
Replace or recharge the unit as needed.
- Is the tamper seal intact?
- Is the unit damaged?
- Is the hose and nozzle unobstructed?
- Is the extinguisher area clear of clutter?

11. EMPLOYEES TRAINING

11.1 Classroom and visual presentation are the method use to share the information.

11.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Incipient Fire Training (Handheld Extinguisher).

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11.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

11.4 Annual training/refreshers will be conducted and evaluated to maintain employee's knowledge and awareness with regards to ELITE Incipient Fire Training procedure.

11.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Incipient Fire Training procedure presentation.

12. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	FORKLIFT OPERATION	HES 024
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this standard is to remind ELITE Forklift operators and affected employees of the need to operate forklift in a safe manner.

3. SCOPE

This procedure applies to all ELITE CONSTRUCCION SL facilities and work locations that involve any forklift operation.

This written procedure includes but not limited to:

- Competency of Operator
- Safe Operations
- Inspection
- Factors that contribute to Forklift truck Accidents

4. RESPONSIBILITY

4.1. General Manager to ensure that Forklift Operation Standard are updated and properly implemented. Make sure that all resources needed for this program are provided.

4.2 HSE Management shall review Forklift Operation standard. To monitor the performance of this program. Keep records on competent Forklift Operator.

4.3. A supervisor must not knowingly operate or permit a worker to operate mobile equipment which is, or could create, an undue hazard to the health or safety of any person, or is in violation of this Regulation.

4.4 Operator's responsibility must operate the equipment safely, maintain full control of the equipment, and comply with the laws governing the operation of the equipment.

4.5 Affected Employees are responsible for following the program requirements outlined in these forklift operation standard procedures required by the company. Report all incident related to forklift immediately to their immediate supervisor.

COMPETENCY OF OPERATOR

A person must not operate mobile equipment unless the person

(a) has received adequate instruction in the safe use of the equipment,

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(b) has demonstrated to a qualified supervisor or instructor competency in operating the equipment,

(c) if operating equipment with air brakes, has a valid air brake certificate or a driver's license with an air brake endorsement, or evidence of successful completion of a course of instruction on air brake systems by an organization acceptable to the board,

(d) is familiar with the operating instructions for the equipment, and has been authorized to operate the equipment.

Only fully trained and authorized individuals are permitted to operate the forklift. Training is done by authorized personnel only and trainees are logged.

5. SAFE OPERATION

5.1 Operator requirements for operating the forklift truck

- Know the recommended load limit of the forklift and never exceed it.
- Know how to assess the weight of the load to be lifted.
- Do a visual and operational check of the forklift at the start of the shift.
- Check for adequate overhead clearance before raising the load.
- Operate a forklift smoothly when stopping, starting, lifting and tilting.
- Know the blind spots of the lift truck with and without a load.
- Keep pedestrians away from a forklift in operation.
- Stop when anyone crosses the route being travelled. Lower the load to the floor, and wait until clear.
- Operate only as fast as conditions safely permit.
- Wear leather gloves when moving or shifting loads or when checking skids.
- Wear fully laced safety boots to give impact protection when moving loads or skids and to
 - provide ankle support when mounting and dismounting lift truck.
- Remain alert and prepare for the unexpected.
- Note anything that affects the normal operation of the forklift and tell the supervisor
 - immediately.
- Keep hands, arms, head, feet and legs inside the confines of a moving forklift.
- Stay in the truck in case of overturn.
- Report any collisions, damage or near-miss accidents to a supervisor immediately.

5.2 What to avoid when operating a forklift truck

- Trying to move or adjust any part of the load, the forklift or the surroundings when on the
 - forklift.

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- Lifting a load that extends above the load backrest unless no part of the load can possibly
- slide back toward the operator.
- Allowing anyone but the operator to ride on the forklift.
- Using pallets elevated by forklifts as an improvised working platform.
- Allowing anyone to stand or walk under the elevated part of any forklift, whether loaded or unloaded.

6. INSPECTION

6.1 What to inspect during a visual pre-use check

- General condition and cleanliness.
- Floor -- clear of objects that could cause an accident.
- Overhead -- no obstructions.
- Nearby objects to avoid as you drive away.
- Fire extinguisher -- present and charged.
- Engine oil level, fuel level, radiator water level (LPG, gas and diesel forklifts).
- Battery -- fully charged; check cables for exposed wires; battery plug connections not loose, worn or dirty; vent caps not clogged; electrolyte levels in cells; hold downs or brackets keep battery securely in place.
- Bolts, nuts, guards, chains, or hydraulic hose reels not damaged, missing or loose.
- Wheels and tires -- check for wear, damage, and air pressure, if pneumatic tires.
- Forks -- fork not bent; no cracks present; positioning latches in good working condition;
- carriage teeth not broken, chipped or worn.
- Chain anchor pins -- not worn, loose or bent.
- Fluid Leaks -- no damp spots or drips.
- Hoses -- held securely; not loose, crimped, worn or rubbing.
- Horn -- working and loud enough to be heard in working environment; other warning
- devices operational.
- Lights -- head lights and warning lights operational.

6.2 What to inspect during the operational pre-use check

- Foot Brake -- pedal holds, unit stops smoothly.
- Parking Brake -- holds against slight acceleration.
- Dead man Seat Brake -- holds when operator rises from seat.
- Clutch and Gearshift -- shifts smoothly with no jumping or jerking.
- Dash Control Panel -- all lights and gauges are operational.
- Steering -- moves smoothly.

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- Lift Mechanism -- operates smoothly (Check by raising forks to maximum height then lowering forks completely.)
- Tilt Mechanism -- moves smoothly, holds (Check by tilting mast all the way forward and backward.)
- Cylinders and Hoses -- not leaking after above checks.
- Listen for any unusual sounds or noises.

7. FACTORS THAT CONTRIBUTE FORKLIFT TRUCK ACCIDENTS

7.1 Behavioral and operational factors that can contribute to forklift trucks accidents

- Improper backing up techniques.
- Improper turning.
- Improper warnings to others about a forklift in use nearby.
- Poor communication during shared tasks, or in shared spaces.
- Riding or giving rides on forklift or load.
- Parking the forklift improperly.
- Improper blocking of wheels on semi-trailers or railway cars.
- Horseplay; stunt driving; jerky, erratic driving.
- Inadequate servicing of the forklift.

7.2 Workplace designs that contribute to forklift trucks accidents

- Narrow aisles.
- Crowded, cluttered aisles.
- Obstructions at intersections and doors.
- Volume of traffic in work area.
- Walking and working in the general area of forklift operations.
- Other workplace conditions such as noise, odours, toxic gases, dust, or poor lighting.
- Many ramps with different surfaces.
- Condition of loading dock.

7.3 Characteristics of the load that can create a hazard

- Poorly stacked or piled on the pallet.
- Pallets in poor repair.
- Load too heavy.
- Load unstable or blocking vision.

7.4 Mechanical conditions or design features that increase the risk for forklift accidents

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- Malfunction of brakes.
- Malfunction of steering.
- Malfunction of clutch, shift linkage, or transmission.
- Malfunction of mast assembly.
- Leaks in hydraulic systems or transmission.
- Safety devices lacking, inadequate, or malfunctioning.
- Emissions from forklifts.
- "Blind spots" or obstructions blocking driver's view.
- Poor layout of controls and displays.

8. EMPLOYEES TRAINING

8.1 Classroom and visual presentation are the method use to share the information to the forklift operator and affected employees.

8.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Forklift operation procedure.

8.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass the assessment he is given a chance to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

8.4 Annual training/refresher will be conducted and evaluated to maintain employees knowledge and awareness with regards to ELITE Forklift operation procedure.

8.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Forklift operation procedure presentation.

9. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	HEARING CONSERVATION	HES 025
	<i>Document Title</i>	<i>Document No.:</i>

2. PURPOSE

The purpose of this hearing conservation program is to prevent occupational hearing loss of ELITE CONSTRUCCIONES SL employee and comply with the COMM/OSHA Standard 29 CFR 1910.95 – Occupational Noise Exposure.

3. SCOPE

This procedure applies to all ELITE CONSTRUCCION SL facilities and work locations that involve any noise or unwanted sound that is a by-product of many industrial processes.


This written procedure includes but not limited to:

- Occupational Noise exposure
- Required monitoring
- Audiometric Test
- Hearing Protection
- Employee education and Training
- Record Keeping

4. RESPONSIBILITY

4.1. Supervisor/Department

- Notifying Health, Safety and Environment (HSE) of noise complaints or potential noise hazards.
- Ensuring that employees are provided with hearing protectors when required.
- Ensuring that employees properly use and care for hearing protectors.
- Ensuring that noise-hazardous equipment/areas are properly labeled or posted (greater than or equal to 85 dBA operating noise level).
- Notifying Health, Safety and Environment (HSE) of process, materials or equipment changes that may alter noise exposures.
- Ensuring that potentially overexposed employees are provided with a baseline audiometric hearing test prior to the initial work assignment and then annually thereafter. High noise exposure must be avoided for 14 hours prior to an exam.
- Enforcing the use of hearing protectors or noise reduction procedures in the designated areas/assignments.
- Ensuring new employee HCP orientation/training and annual refresher HCP training of employees are provided to all potentially overexposed personnel.

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- Maintaining the following records (see Record Keeping 5.5):
 - Name and job classification of the employee in the HCP
 - Audiometric test results from our Occupational Health Provider
 - Noise exposure assessments from EH&S
 - Training documentation

4.2 Environmental Health and Safety (EH&S)

- Administering the Hearing Conservation Program.
- Workplace and employee noise evaluation:
 - noise assessment to determine if administrative and engineering controls are needed, and how they should be implemented.
 - identification of areas or processes that require noise abatement and/or posting.
 - evaluation and periodic re-evaluation of employees' exposure, by job classification, to determine which job titles need to be included in the Hearing Conservation Program.
- Maintaining records of employee exposure measurements.
- Providing comprehensive annual training on HCP and HPDs.
- Assist employees in selecting the proper HPDs and provide instruction on their use.

4.3 Employees

- Wearing hearing protection devices and following any noise reduction procedures as required.
- Storing and maintaining Hearing Protection Device(s) in a clean and sanitary manner.
- Reporting noise hazards and hearing protector problems to their supervisor.
- Attending required training sessions on Hearing Conservation Program.

5. DEFINITIONS AND ACRONYMS

Action Level: An 8-hour time-weighted average of 85 decibels A-weighted (85 dbA 8-hr TWA) established by CAL/OSHA.

Administrative Controls: Methods that limit an employee's exposure time to noise. This includes assigning the employee to less noisy areas in the workplace for a certain length of time so the employee shall not exceed the action level.

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Audiogram Testing: Exams that measure the sensitivity of a person's hearing threshold in decibels as a function of frequency.

Audiometer: An instrument for measuring the threshold or sensitivity of hearing.

Audiologist: A professional specializing in the study and rehabilitation of hearing, who is certified by the American Speech-Language-Hearing Association or licensed by a state board of examiners.

Baseline Audiogram: An audiogram obtained after 14 hours of quiet. The audiogram against which future audiograms are compared.

Continuous Noise: Noise levels that vary with intervals of one second or less.

Decibels (dB): A measure of the sound level (loudness). The decibel scale is a logarithmic scale; as an example, a 90 dB noise is ten times louder than a 80 dB noise.

Decibels, A-Weighted (dBA): The A weighted is the scale used for most occupational noise measurements. The A weighting approximates the range of human hearing by reducing the effects of lower and higher frequency noises with respect to the medium frequencies.

Decibels, C-Weighted (dBC): The C weighted scale filters include both high and low frequency noise and are used for impact noise and in the selection of hearing protection.


Engineering Controls: May include purchasing quieter equipment using barriers, damping, isolating, muffling, installing noise adsorption material, mechanical isolation, variations in force, pressure or driving speed or any combination of methods to decrease noise levels.

Frequency: A sound's pitch measured in hertz (hz); high pitches are high frequency sounds.

Hearing Conservation Program (HCP): Program established when employees are exposed to noise exceeding the Action Level. Program must include noise surveys, audiometric testing, hearing protectors, training, and recordkeeping requirements.

Hearing Protection Devices (HPD's): Personal protective equipment that is designed to be worn in the ear canal or over the ear to reduce the sound level reaching the ear drum. Examples include ear muffs or plugs.

Hearing Threshold Level (HTL): The lowest threshold that the employee can hear the test tone during an audiometric test. The HTL's are recorded on the employee's audiogram.

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Hertz (Hz): A unit of measurement of frequency, expressed as cycles per second.

Impulse/Impact Noise: Noise that is a sharp burst of sound, generally less than one-half second in duration, that does not repeat itself more than once per second.

Noise: Unwanted sound.

Noise Dosimeter: An instrument worn by an individual that integrates the sound level exposure over a period of time.

Noise Reduction Rating (NRR): The Noise Reduction Rating of hearing protection devices (HPD) indicates the theoretical amount of reduction of noise levels that can be achieved if the HPD is worn correctly. This rating is shown on the HPD packaging.

Otolaryngologist: A physician specializing in diagnosis and treatment of disorders of the ear, nose and throat.

Permissible Exposure Limit (PEL): 90 dBA 8-hr TWA.

Pitch: Another term for sound frequency. Higher pitches are higher frequency sounds.

Representative Exposure: Measurements of an employee's noise dose or 8-hour time weighted average sound level that is representative of the exposures of other employees in the workplace.

Sound: A vibration or pressure oscillation that is detectable by the ear drum.

Sound Level Meter: An instrument used for the measurement of noise in sound level surveys.

Speech Interference Levels (SILs): The frequencies most associated with speech, which are the 500- 4000 hz (frequency) range. Vowels (a, e, i, o, u) are low frequency sounds (below 2000 hz) and consonants (b, c, d, etc) are high frequency sounds. The low frequencies are the least affected by noise. If the high frequencies are affected, t's and p's or s's and f's may be easily confused.

Standard Threshold Shift (STS): An average shift from the baseline measurement in either ear of 10 dB or more at 2000, 3000 and 4000 Hz. These frequencies are the most important frequencies in communication and the most sensitive to damage by industrial noise exposure. See Section 3.5

Stanford Risk Management for a definition of a CAL-OSHA reportable STS.

Time-Weighted Average Sound Level (8-hr TWA): That sound level, which if constant over an 8-hour exposure, would result in the same noise dose measured in an environment where noise level varies.

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Threshold of Pain: A noise level of 120 dB causes pain.


6.0 PROGRAM COMPONENTS

6.1 Noise Surveys/Monitoring

- Representative noise monitoring with a designed sampling strategy will be performed by Environmental Health and Safety to allow the identification of employees for inclusion in the Hearing Conservation Program and to enable the proper selection of hearing protection.
- All continuous, intermittent and impulsive sound levels from 80 to 130 dBA shall be integrated into the computation of an 8-hr TWA.
- Monitoring shall be repeated when any changes occur in production, process, equipment or controls which might render the hearing protectors inadequate or require additional employees to be included in the program.
- Employees exposed at or above the action level shall be notified of the results of the monitoring.
- Employees' noise exposure shall be reassessed periodically as needed (i.e. following changes in processes, job responsibilities, equipment or when a STS is determined).

6.2 Audiometric Testing

- Audiometric testing program shall be managed by our Occupational Health Provider.
- Performing audiometric database analysis (ADBA) procedures, as defined in ANSI Standard S12.13-1991, to assess the effectiveness of hearing conservation efforts (i.e., is hearing loss being prevented).
- Baseline audiograms shall be preceded by at least 14 hours without exposure to workplace noise. This requirement may be met by wearing hearing protectors which will reduce the employee's exposure to a sound level of 80 dBA or below.
- Baseline audiograms shall be provided for the employees whose job classification are included in the Hearing Conservation Program upon employment, and annually thereafter.
- Evaluation of audiograms shall be done in compliance with CCR Title 8, section 5097(d).

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- Employees shall be informed in writing within 21 days when an audiogram indicates a standard threshold shift which is determined to be work related


6.3 Hearing Protection Devices

- Employees exposed to noise levels at or above an 8-hour TWA of 90 dBA shall wear hearing protectors. Employees exposed to noise levels at or above the action level of an 8-hour TWA of 85 dBA shall wear hearing protectors if they have experienced a documented standard threshold shift or have not obtained a baseline audiogram.
- Hearing protectors shall be available to all employees exposed to noise levels at or above the action level of 85 dBA, 8-hr TWA, at no cost to the employees.
- Employees shall be given the opportunity to select their hearing protectors from a variety of suitable types.
- Proper initial fitting and supervision of the correct use of hearing protectors shall be provided.
- Hearing protector attenuation shall be evaluated for the specific noise environments in which the protector will be used. The methods used for measuring attenuation shall be one of the four methods described in CCR Title 8, Section 5098, Appendix E.
- Hearing protectors must attenuate the noise level to an 8-hour TWA of 90 dBA or less.
- For employees who have experienced a standard threshold shift, the attenuation must reduce the sound level to an 8-hour TWA of 85 dBA or less.
- Re-evaluation of hearing protectors shall be done whenever a workplace noise level increase renders the hearing protector's attenuation inadequate.
- Workplaces in which the noise level exceeds 85 dBA shall have signs posted.

Signs shall read "Hearing Protectors Required".

6.4 Employee Education and Training

- Annual training is required for all employees exposed to noise at or above an 8-hour TWA of 85 dBA.
- The training shall cover the following information:
 - the effects of noise on hearing.

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-- the purpose, advantages, disadvantages, and attenuation of various types of hearing protectors.

-- instruction of proper fitting and care of protectors.

-- the purpose and procedures of audiometric testing.

- Any informational materials pertaining to this standard that are supplied by OSHA shall be available to the affected employees.

6.5 Record Keeping

- Noise exposure measurement records shall be retained for at least 2 years by Environmental Health and Safety.
- Audiometric test records provided by our Occupational Health Provider should be maintained by departments with employees enrolled in the Hearing Conservation

Program and shall include:

-- the name and job classification of the employee

-- the date of the audiogram

-- the examiner's name

-- the employee's most recent noise exposure assessment

-- the date of the last acoustic or exhaustive calibration of the audiometer and


the measurement of the background sound pressure levels in the audiometric

test rooms.

- Records of audiometric test results shall be retained for the duration of the affected employee's employment.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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2. PURPOSE

This guideline defines minimum permit requirements, procedures limitations and provides forms for the issuance of safe work permits within the ELITE facilities (CAPEX yard and ELITE camp). This guideline does not cover to those works done for the Clients (i.e. MEGPL, AMPCO, EGLNG, HESS, NOBLE, etc.); ELITE Contrucciones follow Client’s respective safe work permitting System.


3. SCOPE

This guideline applies to all persons including ELITE and contractor personnel and defines permit requirements, procedures, limitations and forms used in the issuance of safe work permits, including cold work, hot work, excavation and confined space entry permits to assure consistent safe work permitting within the facility. A safe work permit is required for any Maintenance, repair or construction work within the facility.


Permits are generally not required for work performed in office buildings and Maintenance shops except for confined space entry and hot work on equipment that has been in service. Cold work performed by owning area personnel does not require a safe work permit.

4. DEFINITIONS

- **Acceptable Entry Conditions-** The atmospheric, access/ egress, and work area conditions that must exist in a confined space before entry is allowed.
- **Authorized Entrant-** A person who is authorized under the terms of the confined space entry permit to enter and exit the space.
- **Cold Work-** Any work activity which does not supply sufficient heat or spark energy to provide a potential ignition source for a flammable mixture. This includes general work, scaffolding, cleanup, etc. Hot work or confined space entry is not classified as cold work.

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- **Competent Person-** For the purposes of excavations, an authorized person who is trained in and is capable of identifying existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous or dangerous to employees, and who has authorization to take prompt corrective action to eliminate them.
- **Confined Space-** A space that is:
 - Sufficiently large and so configured that an individual can bodily enter and perform assigned work;
 - Has limited or restricted means of entry or exit;
 - Is not designed for continuous occupancy; and
 - May contain one of the following:
 - > Contains or has the potential to contain a hazardous atmosphere;
 - > Contains a material that has the potential of engulfing an individual;
 - > Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by floors which slope downward and taper to a smaller cross-section; or
 - > Contains any other recognized serious safety and health hazard.
 - Examples of confined spaces include but are not limited to: (a) tanks, (b) vessels, (c) drums, (d) sumps, and (e) excavations greater than 4 feet deep.
 - In addition, temporary shelters used for welding, inspections, etc., where there is a potential for build-up of toxic materials or oxygen depletion may be considered a confined space. These must be evaluated on a case by case bases by the owning department.
- **Designated Attendant** – A qualified individual ("hole watch") stationed outside a confined space as required by the confined space entry procedure.
- **Entry-** The action by which an individual passes through an opening into a confined space. Entry is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.
- **Entry Supervisor-** The individual (Superintendent, Shift Supervisor, Lead Technician) responsible for confined space entry activities. **This function cannot be delegated.**
- **Fire Watch-** A qualified person designated to monitor the area of hot work involving welding or cutting, take appropriate action to reduce risk of fire and if necessary extinguish an incipient stage fire.
- **Hazardous Atmosphere-** An atmosphere that may expose entrants to the risk of death, impairment of ability to exit, injury or acute illness from one or more of the following causes:
 - Flammable gas, vapor or mist in excess of 10 % of the lower explosive limit (LEL)

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- Atmospheric oxygen concentrations below 19.5% or in excess of 23.5%
- Atmospheric concentration of any substance which could result in employee exposure in excess of its permissible exposure limits (PEL).
- **Hot Work-** Work that causes or requires the use of open flames, arcs, sparks, or other forms of high temperature ignition sources that could initiate a fire or explosion. Examples of hot work include welding, burning, soldering, drilling, grinding, abrasive blasting, chipping, the operation of impact wrenches, opening explosion proof electrical enclosures and any other work that may generate sufficient heat that it would pose a possible ignition source.
- **Immediately Dangerous to Life and Health (IDLH)-** Any condition that (a) poses an immediate or delayed threat to life; or (b) would cause an irreversible adverse health effect; or (c) would interfere with an individual's ability to escape unaided from a confined space.
- **Joint Job Site Visit -** A visit to the job area by an Operations person and the person to do the work (or a representative of the person(s) to do the work) to ensure the safety of the workers and the operation by identifying the hazards associated with the job and the measures and equipment to be used to mitigate or eliminate the hazards. Safety Department personnel may be included in the visit for higher risk or more unusual jobs.
- **Non-Hazardous Confined Space-** A confined space which normally exists without IDLH conditions. Entry into such spaces requires the issuance of a confined space entry permit. No blinding is required by the Owning Department as part of the permit issuance. Non-hazardous confined spaces are floating roof tank tops, tower skirts, sunken valve and pump manifold areas, cooling tower cells, and fin fans.
- **Owning Department-** The unit/area/department that is responsible for the location in which the work is performed.
- **Owning Department Representative-** Individuals who have received training and a certification of competency in the issuance of permits and associated gas testing. Certification of competency requires passing a standardized written examination.
- **Retrieval System-** The equipment used for non-entry rescue of persons from confined spaces such as a safety harness and life line.
- **Testing-** The process by which the hazards that may confront personnel performing hot work, vehicle entry, or authorized entrants of a confined space are identified and evaluated.

5. RESPONSIBILITIES


Individual/Group	Assigned Responsibilities
Owning Department	<p>Permit Preparation:</p> <ul style="list-style-type: none"> • Prepare equipment or area • Prepare and issuing all permits • Initially review the Process Unit Overview with all contractors and inform them of the location of posted Process Unit Overviews • Perform a joint job site visit as required in the permit preparation procedure (Appendix 1). • Ensure that work proceeds in accordance with the terms of the permit issued.

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Individual/Group	Assigned Responsibilities
	<ul style="list-style-type: none"> • Ensure that the recipients of the permit understand its terms and limitations. • Ensure that work will not cause any negative impacts to the environment. • Ensure that the atmosphere is continuously monitored during a confined space entry as outlined in the Confined Space Permit Preparation section of this guideline. <p>Permit Enforcement/Follow up:</p> <ul style="list-style-type: none"> • When the permit must be updated during the shift while the permit is valid, enter the update time(s) in the Permit Timing box and initial by the updated items. • Cancel the permit if conditions of the permit are not being met or if the area or equipment conditions change requiring either the termination or re-issuance of the permit. • Ensure that the permit issuance procedures are being followed. • Ensure that the terms of specific permits are being followed. • Reviewing and signing hot work permits. • Ensure that completed entry and confined space entry permits are returned to the Safety Department.
Work Supervisor or designee (company or contractor)	<ul style="list-style-type: none"> • Ensure that all work carried out by personnel in their work crew is covered by valid permits. • Ensure that all members of the work crew review the permit requirements and sign the back of the permit form to confirm their understanding. If the permit is changed or updated, ensure that all members of work crew re-sign to confirm understanding of the change(s).

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Individual/Group	Assigned Responsibilities
Work Supervisor or designee (company or contractor)	<ul style="list-style-type: none"> • Obtain proper permits from the Owning Department and review and accept the permit terms and restrictions prior to starting work. • Provide estimated number in work crew. • Assure that a joint job site visit as required in the permit preparation procedure (Appendix 1) is performed. • Review the permit with the work crew. <p style="text-align: center;">NOTE: CONTRACTORS MUST REVIEW THE PROCESS UNIT OVERVIEW WITH ALL PERSONNEL INVOLVED IN THE WORK ACTIVITIES DESCRIBED ON THE PERMIT PRIOR TO STARTING WORK.</p> <ul style="list-style-type: none"> • Ensure that the work described in the permit is completed and/or left in a safe condition prior to leaving the work area, including cleaning the area up. • Check in with the confined space designated attendant when entering and exiting a confined space. • Maintain their copy of the permit at the work site. • Ensure the Owning Department fully understands the scope of the work to be done. • Sign and return their copy of the permit to a person in the Owning Department when the work is complete or the permit expires.
HSE Department	<ul style="list-style-type: none"> • Provide advice/training as required in gas testing. • Sign initial confined space entry permits. (Non-Hazardous Confined Spaces excepted, See section 5.5.1) • Annually review the confined space entry program using completed permits to determine where improvements, if any, can be made to better protect confined space entrants (the annual review is documented). • Maintain files of completed work permits involving gas tests indefinitely. • Establish general standards for acceptable entry conditions. • Establish general standards for equipment required under this SHG. • Develop and implement procedures and resources for rescue and emergency services.
Authorized Entrants (company or contractor)	<ul style="list-style-type: none"> • Adhere to the terms and restrictions of the confined space entry permit. • Check in and out of the confined space with the designated attendant. • Use the safety equipment specified on the entry permit properly. • Know the hazards that may be encountered during the entry and the effects of overexposure to potential contaminants. • Stay in communication with the attendant during entry and promptly following any emergency instructions. • Exit the space based on their own judgment, an order from the attendant, or an alarm.

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Individual/Group	Assigned Responsibilities
Entry Supervisor	<ul style="list-style-type: none"> • Determine if acceptable conditions are present at a confined space. • Authorize entry. • Oversee confined space entry activities • Know and properly communicate the hazards that may be faced during entry and the effects of exposure to the hazards. • Terminate entry as required.
Fire Watch	<ul style="list-style-type: none"> • Have NO OTHER RESPONSIBILITIES that would interfere with his/her reliably fulfilling fire watch duties. • Maintain vigilance for changes in area or work conditions that may increase the chance for a fire or explosion and stopping work accordingly. • When exposed combustibles (wood, paper, rags, dry grass, etc.) are present within 35 feet of the work area fire watch can only leave the area after hot work has been stopped for thirty minutes or a relief attendant has been obtained.
Designated Attendant (Hole Watch)	<ul style="list-style-type: none"> • Have NO OTHER RESPONSIBILITIES that would interfere with his/her reliably fulfilling hole watch duties. • Know the hazards that may be encountered during entry and the effects of exposure to the hazards. • Maintain an accurate roster of personnel who enter and exit the confined space. • Remain outside the confined space. • Monitor the atmospheric testing equipment used for continuous monitoring and respond appropriately. • Communicate with entrants and monitor status of a change in conditions that would create a need to evacuate the confined space. • Maintain a means of communicating with the Owning Department and/or Maintenance. • Order an evacuation of the confined space, performing non-entry rescue if conditions warrant, or summon rescue or emergency services. <p style="text-align: center;">(THE ATTENDANT WILL NOT ATTEMPT ENTRY RESCUE!)</p> <ul style="list-style-type: none"> • Ensure that only authorized entrants are allowed into the confined space.

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6. PERMITTING PROCEDURES


6.1 Permitting for Cold Work

PERMITTING FOR COLD WORK	
ACTION	DESCRIPTION
Preparation of the Cold Work Permit	<ul style="list-style-type: none"> • Upon receipt of a Maintenance work order or request, the Owning Department will prepare a Safe Work Permit based on: <ul style="list-style-type: none"> • Understanding the nature and extent of the work to be done. • A review of the impact of the work on the operability/safety of the process or general area by conducting a job site visit before the permit is issued. Prior to more hazardous activities this visit is made collectively with the Maintenance/contract craftsmen BEFORE THE WORK IS ALLOWED TO BEGIN (see Appendix 1, Section B). • Communicating to the persons who will perform the work, the personal protective equipment and other precautions that need to be taken to perform the work safely. • Ensure that the equipment to be worked on is appropriately prepared (i.e., locked out, drained, steamed, blinded, etc.), and if being worked on while still operating, what additional precautions are necessary. (Bring the green copy of the permit in the field for a reference during jobsite preparation.) • Ensure that all personnel who may be impacted by the work are aware that the work is commencing.
Signing the Safe Work Permit	<ul style="list-style-type: none"> • By the Owning Department representative. • By the work supervisor, designee or contract craftsmen.
Issuing the Safe Work Permit	<ul style="list-style-type: none"> • By the Owning Department to the Maintenance/contract craftsmen that will perform the work. • Permit to remain on the job site until completion of the work or the permit expires, whichever occurs first. • Permit must be legibly written/completed.
Permit Expiration/Renewal	<ul style="list-style-type: none"> • Unless special provisions are made, a new permit is required at the beginning of each new work shift for the Owning Department and work crew. • Expired permits and permits on work that has been completed are returned to a person in the Owning Department that issued it and forwarded to Safety.


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6.2 Permitting for Hot Work

PERMITTING FOR HOT WORK	
ACTION	DESCRIPTION
Preparation of the Hot Work Permit	<p>Upon receipt of a Maintenance work order or request, the Owning Department will prepare a Hot Work Permit based on:</p> <ul style="list-style-type: none"> • Understand the nature and extent of the work to be done. • Review the impact of the work on the operability/ safety of the process or general area by conducting a job site visit before the permit is issued. This visit is made jointly with a representative of the work crew BEFORE THE WORK IS ALLOWED TO BEGIN (see Appendix 1, Section B). • Performing gas testing of the area as appropriate where the work will be performed; the boundaries of the area to be tested depend on the nature of the work to be done. • Ensure that the results of any gas tests taken are included on the permit, including the serial number and date of last calibration of the instrument used. • Communicate to the persons who will perform the work, the personal protective equipment and Fire Watch precautions that need to be taken to perform the work safely. <p>NOTE - HOT WORK NOT INVOLVING OPEN SPARKS OR FLAMES MAY NOT REQUIRE THE DESIGNATION OF A FIRE WATCH ATTENDANT (SEE NOTES IN APPENDIX).</p> <ul style="list-style-type: none"> • Ensure that the equipment or area is appropriately prepared, i.e., sewers covered, equipment drained and cleaned, combustibles removed, blinds in place, etc. (Bring the green copy of the permit in the field for a reference during jobsite preparation.) • If a Fire Watch is required, ensure that a fire extinguisher or charged water hose is available at the scene of the work. • Ensure that all personnel who may be impacted by the work are aware that the work is commencing. • Ensure that the name of any designated Fire Watch is included on the form.


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PERMITTING FOR HOT WORK	
ACTION	DESCRIPTION
Signing the Hot Work Permit	<ul style="list-style-type: none"> • By the Owing Department representative and the individual who did the gas testing. (The name of the person doing the gas testing may be printed in the space provided.) • By the company work crew representative and/or contractor work crew representative.
Issuing the Hot Work Permit	<ul style="list-style-type: none"> • By the Owing Department to the company work crew representative or contractor representative. • Permit to remain at the job site until completion of the work (including extended Fire Watch) or the permit expires, whichever occurs first. • Permit must be legibly written/completed.
Permit Expiration/Renewal Completed Work	<ul style="list-style-type: none"> • Work described in the permit must commence within 2 hours of gas testing; if it does not, a new gas test will be required prior to beginning work. • In work areas where exposed combustibles (wood, paper, rags, dry grass, etc.) are present within 35 feet of the work area, the firewatch, or a relief attendant, is required to remain at the work site for a minimum of thirty minutes after completion of permit-related hot-work activities before turning in the work permit. • Unless special provisions are made, a new permit is required (and gas test, if appropriate) at the beginning of each new work shift for the Owing Department and work crew. • Expired permits and permits on work that has been completed are returned to a person in the Owing Department that issued it and forwarded to Safety.


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6.3 Permitting For Excavation

PERMITTING FOR EXCAVATION	
ACTION	DESCRIPTION
Atmospheric Testing	<ul style="list-style-type: none"> • Must be performed prior to ANY entry (other than entry required for performing atmospheric testing of large confined spaces). • Confined Space work described in the permit must begin within 2 hours of gas testing; if it does not, a new gas test will be required prior to beginning work. <p>NOTE- The atmosphere during any initial entry for testing will be assumed to be IDLH; PPE for personnel entering to perform gas testing will be selected accordingly.</p> <ul style="list-style-type: none"> • Will be performed by a trained, Owing Department representative with advice as required from Safety. • Will be performed in the order of oxygen, flammable, and then air toxins unless the analyzer monitors for all simultaneously. • Will be performed with an instrument that has been calibrated. • Continuous monitoring may be required under special situations as outlined in the Confined Space Permit Preparation section of this guideline.
Preparation of the Excavation Permit	<ul style="list-style-type: none"> • Prior to beginning the excavation and as part of permit preparation, the Maintenance Department will contact if appropriate local or state authorities, companies or utilities. Contractors must contact the Maintenance Department before any excavation work is done. • Upon receipt of a Maintenance work order or request, the Owing Department will prepare an Excavation Permit based on: <ul style="list-style-type: none"> ▪ Understanding the nature and extent of the work to be done. ▪ A review of the impact of the work on the operability/ safety of the process or general area by conducting a job site visit before the permit is issued. Typically, this will require a visit made jointly with the company work crew or contractor representative BEFORE THE WORK IS ALLOWED TO BEGIN (see Appendix 1, Section B). Drawings of underground tanks, lines and utilities will be reviewed as needed. ▪ Perform gas testing of the area as needed. ▪ Ensure that the results of any gas tests taken are included on the permit, including the serial number and date of last calibration of the instrument used. ▪ Communicate to the persons who will perform the work, the personal protective equipment and other precautions that need to be taken to perform the work safely. ▪ Ensure that the immediate and surrounding area to be involved is appropriately prepared, i.e., sewers covered, perimeter barricaded, equipment drained and cleaned, combustibles removed, a spoil area or container established, etc.


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PERMITTING FOR EXCAVATION	
ACTION	DESCRIPTION
	<ul style="list-style-type: none"> ▪ Ensure that all personnel who may be impacted by the work are aware that the work is commencing.
Signing the Excavation Permit for Confined Space Entry	<ul style="list-style-type: none"> • By the Owing Department representative and the person who did the gas testing. • By the company work crew or contractor representative. • By the company or contractor competent person if the excavation is deeper than 4 feet and must be entered.
Issuing the Excavation Permit	<ul style="list-style-type: none"> • By the Owing Department to the company work crew or contractor representative. • Permit to remain posted in the area until completion of the work or the permit expires, whichever occurs first. • Permit must be legibly written/completed.
Excavation Constraints	<ul style="list-style-type: none"> • If the excavation is deeper than 4 feet and must be entered: <ul style="list-style-type: none"> ▪ It must be inspected by the company or contractor competent person to assure that it is properly shored or sloped and barricaded and has adequate access and egress. ▪ It must be permitted as a confined space prior to entry (see Confined Space Entry table below) and will require a confined space attendant (hole watch). ▪ Excavated soil must be kept at least 2 feet from the edges of the excavation. ▪ It must be re-inspected by the company or contractor competent person after a rainstorm or any event that may compromise the integrity of the excavation walls. • All adjacent structures, buildings, walls, etc. must be braced or underpinned to prevent collapse into the excavation. • Trenches and excavations will have barriers set back far enough to prevent vehicular traffic from causing cave-ins.
Permit Expiration/Renewal	<ul style="list-style-type: none"> • Excavation work described in the permit must begin within 2 hours of gas testing; if it does not, a new gas test will be required prior to beginning work. • Unless special provisions are made, a new permit is required (and gas test, if appropriate) at the beginning of each new work shift for the Owing Department and work crew. • Expired permits and permits on work that has been completed are returned to a person in the Owing Department that issued it.

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6.4 Permitting For Confined Space

GENERAL REQUIREMENTS FOR CONFINED SPACES	
ACTION	DESCRIPTION
Removal of Entrance (Manway) Covers	<ul style="list-style-type: none"> • Any conditions making it unsafe to remove a cover will be eliminated to the extent practical before the cover is removed. Owing department will assure the following actions are taken to make a space "safe" : <ul style="list-style-type: none"> ▪ Blinding and/or disconnecting all lines entering the space. ▪ Cleaning the space thoroughly by draining, water washing, steaming, or other suitable means. ▪ Locking out/tagging out/disconnecting devices such as mixers, radiation sources, etc. • When entrance covers are removed, the opening shall be promptly guarded by a railing or barrier to prevent accidental entry or falls, etc., until the space is permitted and made ready for entry. • A sign stating "DANGER – CONFINED SPACE - Enter by Permit only" will be immediately placed at the entryportal by whoever removes the entrance cover. Owing department is responsible for making the sign available.
Excavations	<ul style="list-style-type: none"> • Adequate means of exit must be provided such as a ladder or steps so that a person must not have to travel more than 25 feet to exit.
Atmospheric Testing	<ul style="list-style-type: none"> • Must be performed prior to ANY entry (other than entry required for performing atmospheric testing of large confined spaces). • Confined Space work described in the permit must begin within 2 hours of gas testing; if it does not, a new gas test will be required prior to beginning work. <p>NOTE- The atmosphere during any initial entry for testing will be assumed to be IDLH; PPE for personnel entering to perform gas testing will be selected accordingly.</p> <ul style="list-style-type: none"> • Will be performed by a trained, Owing Department representative with advice as required from Safety. • Will be performed in the order of oxygen, flammable, and then air toxins unless the analyzer monitors for all simultaneously. • Will be performed with an instrument that has been calibrated¹ • Will be done initially with air movers off; subsequent retesting can be done with the air movers remaining on.
<p>¹Gas testing instrumentation must be regularly calibrated in accordance with the manufacturer's Recommendations. Exact time periods may vary. Typically, formal calibrations are required at least monthly. (Records of these formal calibrations must be maintained.) However, a field check of the operability of the instrument is required at least before each day's use.</p>	

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GENERAL REQUIREMENTS FOR CONFINED SPACES

ACTION	DESCRIPTION
Preparation of the Confined Space Permit	<p>Upon receipt of a Maintenance work order or request, the Owning Department will prepare a Confined Space Permit based on:</p> <ul style="list-style-type: none"> • Understanding the nature and extent of the work to be done so that potential hazards can be identified, described in the permit and suitably addressed. • Assuring that all pre-entry preparations of the space have been completed (e.g., blinding, steaming, chaining/locking of valves, locking out of electrical and radiation sources, opening of bleeders, access and egress from the space is easy, etc.) by conducting a joint job site visit with the company work crew or contractor representative (see Appendix 1, Section B). (Bring the green copy of the permit in the field for a reference during jobsite preparation.) • Perform initial entry gas testing of the space (see notes above on Atmospheric Testing). • Ensure that the results of the gas test are included on the Confined Space Permit, including the serial number(s) and date of last calibration of the instrument(s) used to perform the testing. • Communicate to the persons who will perform the work, the hazards, the required personal protective equipment, and other precautions needed to perform the work safely. • Assigning qualified individuals to be the designated attendant(s) (hole watch). • Ensure that the atmosphere is continuously monitored during a confined space entry when special conditions exist such as but not limited to the following: <ul style="list-style-type: none"> - Use of inert gases - Possibility of restricted ventilation - Possibility of introduced toxic gases • Ensure that all personnel who may be impacted by the work are aware that the work is commencing.
Signing the Confined Space Permit	<ul style="list-style-type: none"> • By the Owning Department representative who performed the gas testing. • By the Entry Supervisor. • By a Safety representative (INITIAL CONFINED SPACE PERMIT ONLY, NON-HAZARDOUS CONFINED SPACE EXCEPTED).

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GENERAL REQUIREMENTS FOR CONFINED SPACES	
ACTION	DESCRIPTION
Issuing the Confined Space Permit	<ul style="list-style-type: none"> • Is issued to the space, not to any specific craft or contractor. • Must describe the method of communication between the attendant and personnel inside the space. • Is used by the designated attendant to keep a running tally of entrants entering and leaving the space. • Is used by the attendant to keep a record of initial and subsequent gas tests of the space. • Must remain with the designated attendant or posted at the entry portal, normal access ladder/stairs, or other effective location for review.
Confined Space Permit Renewal/Expiration	<ul style="list-style-type: none"> • Can be issued for the job duration but will not exceed 24 hours. • Must be canceled and reissued after a significant plant emergency that may compromise the validity of the permit conditions. • Must be canceled and reissued if the configuration or use of the space changes in such a way that hazards are increased. • If any of the entrants detect a potentially hazardous atmospheric condition, the permit must be pulled until an investigation is made by the Entry Supervisor. This action would be noted on the comment section (reverse side) of the permit form. If nothing is found, the permit should be marked in the comment section as "REVALIDATED." • If the Confined Space Permit is canceled, all craft specific permits referencing this permit must be canceled and reissued as well. • After completion of the work or expiration of the permit, it must be returned to a person in the Owning Department for cancellation and subsequent return to Safety for filing.
Special Conditions/ Deviations	<p>NEW CONSTRUCTION:</p> <ul style="list-style-type: none"> • Any deviations of confined space entry permitting requirements will be a joint decision by Maintenance, Engineering, Operations and Safety.
Lighting/Electrical Power	<ul style="list-style-type: none"> • Artificial lighting or power used within a confined space will meet the following requirements: <ul style="list-style-type: none"> ▪ Use a 12-Volt power supply or a 120-Volt system with ground fault circuit interrupters (GFCI's). ▪ Meet the requirements for Class I, Division 2, Groups C & D rating where possible explosive or flammable atmospheres cannot be eliminated.



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GENERAL REQUIREMENTS FOR CONFINED SPACES

ACTION	DESCRIPTION
<p>Ventilation</p>	<ul style="list-style-type: none"> • Grounded air movers will be provided for all vessel confined space entries where the design of the vessel will allow. • If the temperature within the space is in excess of 105° F, it will not be permitted for entry without special provisions determined by discussion between the Operations, Maintenance or Contractor Supervisor and Safety. • Ventilation systems meeting the requirements detailed below must be implemented, or supplied air respirators must be worn by welders and other personnel inside the space when welding in the following confined spaces: <ul style="list-style-type: none"> ▪ Work space is less than 16 feet high; ▪ Volume of the space is less than 10,000 ft³ per welder; ▪ Work areas where there are partitions, structural barriers, or other barriers that significantly obstruct airflow (such as baffles, trays, or limited access openings) • If the space meets one of the criteria above, one of the following ventilation options must be implemented or supplied air utilized by all persons in the space: <ul style="list-style-type: none"> ▪ Provide at least 2000 ft³ / min of airflow for each active welders; or ▪ Provide each welder with a local exhaust device capable of maintaining a velocity of 100 fpm toward the air intake.
<p>Welding</p>	<ul style="list-style-type: none"> • When arc welding inside of a confined space is suspended for lunch, breaks or shift change, the electrodes shall be removed from the holders and the holders located so that accidental contact cannot occur. Also, the welding machine must be disconnected from the power source or turned off in the case of a diesel-powered machine. <ul style="list-style-type: none"> • When gas welding or cutting inside of a confined space the torch valves must be closed and the fuel-gas and oxygen supply to the torch must be positively shut off at a point outside the confined space whenever the space is evacuated for extended work stoppage (i.e. breaks or lunch). Where practicable, the torch and hose must also be removed.
<p>Respiratory Protection</p>	<ul style="list-style-type: none"> • If cleaning and/or forced air ventilation do not adequately remove air contaminants from the confined space or the work is such that it will introduce additional contaminants into the atmosphere within the space, RESPIRATORY PROTECTION WILL BE USED. <ul style="list-style-type: none"> ▪ Required respiratory protection will be specified by the Owning Department Supervisor with advice as needed from Safety. ▪ Entry into an IDLH atmosphere will only be made after alternatives are explored and found impractical and agreement is reached between the Operations, Maintenance and the Safety Manager/Superintendent. ▪ Entry into an IDLH atmosphere will require that all entrants be


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ACTION	DESCRIPTION
	equipped with a positive pressure airline respirator with an emergency egress pack and a safety harness and lifeline.

CONFINED SPACE ENTRY PERMIT

ACTION	DESCRIPTION
<p style="text-align: center;">Preparation of the Confined Space Entry Permit</p> <p>(Refer to Appendix 1 for additional details on the completion of the permit form).</p>	<ul style="list-style-type: none"> • SAFE WORK PERMIT FOR CONFINED SPACE ENTRY MUST BE ISSUED FOR EACH CRAFT OR CONTRACTOR. • Inspection activities (Maintenance, Safety, and Engineering) may be performed under an active craft or contractor permit. Owing Department personnel signing the permit must be aware of all work to be performed, including inspection activities.
<p style="text-align: center;">Signing the Confined Space Entry Permit</p>	<ul style="list-style-type: none"> • By the Owing Department representative. • By the company work crew or contractor representative.
<p style="text-align: center;">Issuing the Confined Space Entry Permit</p>	<ul style="list-style-type: none"> • Must reference the number of the Confined Space Permit (issued to the confined space). • Is issued by the Owing Department to the Maintenance/ contract craftsmen that will perform the work. • Will contain any special precautions or restrictions pertinent to that particular task or craft. • Must be available at the work site for review.
<p style="text-align: center;">Renewal/Expiration</p>	<ul style="list-style-type: none"> • Is issued for one Maintenance or Owing Department work shift. • Must be canceled and reissued after any change in plant conditions or a plant emergency that may compromise the validity of the permit conditions. • After completion of the work or expiration of the permit, the permit must be returned to a person in the Owing Department for cancellation and subsequent return to Safety for filing.

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7. TRAINING

7.1 Company Employees

- Prior to the assignment of duties under these ELITE, all employees will be trained in the execution of the duties for which they are responsible. An annual training will be conducted and evaluated to ensure employees are knowledgeable with regards to ELITE Safe Work Permit System. An employee must have a grade not less than 80% of the examination to pass the assessment.
- Records of the training will be maintained in the Training Department files.

7.2 Contractors

- Prior to the assignment of duties under these ELITE, contractor employees will be trained annually. Contractor employee must have a grade not less than 80% of the examination given to pass the assessment.
- During their safety orientation, contractors will be informed of ELITE's permitting procedures.
- Contractor representatives will participate in the joint job site visits and discuss with the ELITE permit issuer the exact nature and extent of the work planned. Coordination of the work with the ELITE Maintenance and Owning Department will be required. The details of how this coordination will be handled will be agreed upon with the ELITE contractor representative prior to the start of work.
- ELITE's confined space entry procedure comprises the minimum standards for any entry. If any measure in excess of these requirements will be used by the contractor, this information must be communicated to the ELITE permit issuer prior to the issuance of the work permit.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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2. PURPOSE

The purpose of this respiratory protection Awareness is to establish the procedures and requirement necessary to ensure that all ELITE affected individuals are protected from exposure to respiratory hazards that may be present in the workplace. In addition to the awareness of the use of respiratory protection equipment for control of hazardous exposures, some employees may choose to wear respirators under condition where respiratory protection is not required to protect from a hazard. In these cases, if respirator use does not jeopardize the health or safety of the employee, respiratory protection will be provided in accordance with regulatory requirements.

3. SCOPE

This respiratory protection program applies to all ELITE facilities and worksite areas.

The Respiratory Protection Program includes the following elements:

- Identification of roles and responsibilities of individuals and groups at ELITE involved with implementation of the Program
- Procedures for respirator selection
- Requirements for respirator use, including medical qualifications, fit-testing, and maintenance of respirators
- Training of employees in hazard characteristics and proper use of respirators
- Provisions for the auditing of program compliance

4. ROLES & RESPONSIBILITIES

A. Employees

Any employee who wears a respirator shall:

- Maintain a close shave as necessary to ensure the proper fit of the respirator for health and safety purposes
- Inform his/her supervisor or Industrial Hygiene of changes in workplace conditions which may place an increased physical burden on the employee
- keep respirators clean to ensure they are free of contamination that could affect the fit and compromise personal protection

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- Use only issued respirators for which he/she is trained and fitted

B. Supervisors/Work Leads

Supervisors or work leads, who direct the work of employees required to wear respirators, shall:

- Ensure that employees assigned to wear respirators for a given task or job are clean shaven before respirators may be worn
- Identify, with the assistance of the HSE Industrial Hygiene, those employees who may need respiratory protective equipment
- Ensure that employees required to wear respiratory protective equipment receive initial and subsequent medical evaluation, fit testing, and training, as required by this document;
- Ensure that employees maintain respiratory equipment in a clean and sanitary condition
 - Ensure that employees receive medical reevaluations if a change in workplace conditions such as physical work effort, protective clothing, or temperature, may result in a substantial increase in the physiological burden placed on the employee.

C. Respiratory Protection Program Administrator (and Program Staff)

The Respiratory Protection Program Administrator (Program Administrator) is responsible for managing the Respiratory Protection Program. Responsibilities include:

- Performing or reviewing Hazard Assessments for respirator users
- Identifying respiratory protection options
- Providing respirator and expected work information to Health Services, to support their medical evaluation of respirator users
- Conducting respirator training. This includes fit testing, respirator use, storage, and maintenance. Respirator training is required before an employee uses a respirator, and is repeated annually
- maintaining records of respirator training

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- Informing Health Services of the need to medically reevaluate employees based on reports from employees, observations during fit testing or program evaluation, or changes in workplace conditions
- Regularly evaluating the effectiveness of the Respirator Program
- Investigate instances of respiratory protective equipment malfunction to determine the cause and to identify the appropriate corrective action.

5. PROCEDURE FOR RESPIRATORY SELECTION AND USE

5.1 Respiratory Selection

Based on Identified hazards, the Program Administrator shall maintain and issue respiratory protective equipment when required by ELITE. A variety of models and sizes of respirators shall be available to offer employees a choice of equipment, so that the respirator they select is comfortable and provides an acceptable fit.

In addition, to the standard respiratory protection equipment maintained for routine use, respirators may be used during hazard assessment or other situations, when the exposure cannot be identified or reasonably estimated. In these situations the atmosphere shall be considered IDLH. ELITE employees are not currently authorized to enter or perform work in IDLH atmospheres. If such work were to be authorized in the future, two types of respiratory protective equipment could be used for IDLH atmospheres:

- A full face piece pressure demand SCBA with a minimum service life of 30 minutes
- A combination full face piece pressure demand airline respirator with auxiliary escape self-contained air supply

5.2. Respirator Use

The Program requires that employees use and care for respirators issued to them, according to requirements listed in the Training Review Guidelines. A copy is provided to each employee during the annual Respirator Training. This training includes inspection prior to each use and seal to make sure that the valves and face seal are working properly. Respirators that are damaged or fail to fit properly should not be used, but should immediately be removed from service and returned to the HSE Industrial Hygiene Group for evaluation.

When not in use, respirators shall be stored to protect against dust, sunlight, extremes of temperature, excessive moisture, or damaging chemicals. Respirators should be decontaminated if necessary, and allowed to dry before being stored in sealed plastic

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bags or other sealed containers. Users will follow instructions as detailed in this program and any additional specific guidance provided to them, for cartridge replacement.

An employee may wear their own prescription contact lenses while wearing a half mask or full face piece respirator if they choose this option.

5.3. Breathing Air

Compressed air cylinders including SCBA tanks, and breathing air supplied by a compressor, may be used at LBNL. Use of compressed air is subject to the following requirements:

- Compressed air shall meet the requirements of CGA Type 1-Grade D breathing air
- Cylinders of breathing air shall meet DOT requirements and have a certificate of analysis

that the breathing air meets the requirements for Type 1-Grade D breathing air

- Compressors that supply breathing air shall be constructed to prevent entry of contaminated air into the air-supply system
- Breathing air supplied by compressors shall be tested to verify quality

6. TRAINING

Employees required to wear respiratory protective equipment must be trained in the selection, care, use and limitations of that equipment. This annual training will be completed for tight fitting and loose-fitting face piece respirator. Respirator Training includes fit testing, as described in the Fit Testing section of this document.

Training of voluntary users of filtering face piece respirators is provided in Respirator Awareness Training (Dust Mask). This training is required one time only.

Respiratory training may vary depending on the type of respirator to be issued and the nature of the airborne hazard. At a minimum, the training shall include:


- The purpose of respiratory protective equipment
- The prerequisites for respirator use, including medical qualification, training, and fit testing
- The different types of respirators, their specific application, selection, and limitations
- The issuance procedure for respirators
- The use of respirators, including field seal checking procedures;
- Cleaning and sanitizing procedures

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- The proper storage of respirators
- Inspection and maintenance procedures

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

	HYDROGEN SULFIDE	HES 028
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2. PURPOSE

ELITE Construcciones SL is constantly striving to improve the safety of our employee customers, and community. To further that goal, we have developed and have implemented this program specific to hydrogen sulfide safety. Through this program we hope to assure that all company employees performing job tasks in which a potential hydrogen sulfide exposure could occur, are protected. Compliance with this program is mandatory and is applicable to all company employees who work in an environment where hydrogen sulfide may be present in any amount.

Failure to comply will result in disciplinary action and/or is grounds for termination.

3. SCOPE

This procedure applies to all ELITE CONSTRUCCIONES SL facilities and work locations that perform any duties on an any operations that may expose employees to H2S or having a proximity to H2S release and accumulation situations.

4. RESPONSIBILITY

4.1. Senior management shall;

4.1.1. Assign and review the development of a Hydrogen Sulfide awareness program.

4.1.2. Provide the necessary resources to implement, support, and enforce the Hydrogen Sulfide (H2S) awareness program within the company.

4.1.3. Serve the role of technical support and consultation to departments of affected employees to interpret requirements and establish safe practices.

4.2. Site Supervisors shall;

4.2.1. Recognize potential of H2S exposure of workers based on this policy, notifying safety management of each potential H2S exposure that their employees may face and to involve their affected employees in this program.

4.2.2. Notify Risk Management and Safety of the need for appropriate training, such as determining characteristics, possible sources and hazards of Hydrogen Sulfide.

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4.2.3. Evaluate, on an annual basis, the effectiveness of the program as it applies to the work that their affected employees perform and to provide Risk Management and Safety with their conclusions, compliance challenges and recommendations.

4.3 Affected Employees shall;

4.3.1. Follow the program requirements outlined in this policy and standard procedures required by their department for the work activities they are involved with.

4.3.2. Notify their supervisor when questions arise surrounding safe procedures, the need for personal protective equipment and difficulties complying with requirements.

4.3.3. Attend any Hydrogen Sulfide training that is required of them.

4.3.4. Report all accidents and near misses that they witness or incur. This will help the ELITE CONSTRUCCIONES SL to improve safe practices.

5. DEFINITIONS

Hydrogen Sulfide (H₂S) – Colorless gas or liquid, with the odor of rotten eggs.


Permissible Exposure Limit (PEL) means the dermal or inhalation exposure limit.

* For Hydrogen Sulfide the PEL is 10 PPM.

6. HYDROGEN SULFIDE

6.1 Overview

Exposure to Hydrogen Sulfide occurs in many industries. Most exposures center around the oil and natural gas industries. Hydrogen sulfide is an extremely toxic, flammable gas that may be encountered in the production of gas well gas, high-sulfide high sulfur content crude oil, crude oil fractioning, associated gases, and waters. Hydrogen sulfide is heavier than air, and can collect in low places. As an employee of the company, potential exposure to various forms and amounts of hydrogen sulfide may occur during certain job activities. However, any exposure should be avoided. If an exposure cannot be avoided through ventilation, etc., proper personnel protective equipment must be used.

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6.2 Forms of Hydrogen Sulfide Exposure

Hydrogen Sulfide exposures are almost exclusively through inhalation. However, other exposures such as ingestion should not be overlooked. Inhalation at certain concentrations can cause Hydrogen Sulfide to injury or death. The listed IDLH (immediately dangerous to life and health) level is extremely low (300 PPM).

6.3 Health and effect of Hydrogen Sulfide Exposure

6.3.1 If steps are not taken to control exposure, continued inhalation of Hydrogen

Sulfide Hydrogen Sulfide could result in:

6.3.1.1 Loss of the sense of smell.

6.3.1.2 Death

6.3.2 Low concentration exposures (under 10 PPM)

6.3.2.1 In low concentrations, Hydrogen Sulfide can be detectable by its odor; however, the smell cannot be relied upon to forewarn of dangerous concentrations, because it rapidly paralyzes the sense of smell. A longer exposure to the lower concentrations may result in the loss of the sense of smell.

6.3.2.2 Symptoms from repeated exposure to low concentrations usually disappear after being removed from the exposure for a period of time.

6.3.3 Higher concentration exposures (10 PPM and above)

6.3.3.1 Concentrations that are prolonged or of high concentrations may lead to death.

6.3.3.2 It should be well understood that the sense of smell will be rendered ineffective by hydrogen sulfide, which can result in an individual failing to recognize the presence of dangerously high concentrations. Exposure to hydrogen sulfide causes death by poisoning the respiratory system.

6.3.4 REPORTING OF PROBLEMS

Immediately notify your supervisor if you develop potential signs or symptoms associated with Hydrogen Sulfide exposure. You should also notify your

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supervisor if you have difficulty breathing while wearing a respirator or suspect problems with other personal protective equipment.

6.3.5 EXPOSURE ASSESSMENT

The job site foreman will determine if employees are exposed to concentrations of hydrogen sulfide. The exposure determination shall be based on the following:

6.3.5.1 Personal exposure monitoring

6.3.5.2 If the initial exposure determination reveals employee exposure to be below the STEL, continuous monitoring will be performed. In addition, continuous ventilation shall be used. Appropriate personnel protective equipment will be worn by all employees exposed to Hydrogen Sulfide.

6.4 PREVENTING EXPOSURE

Proper control of exposure to Hydrogen Sulfide is the responsibility of both the host employer, ELITE Construcciones SL and the employee. All of the control methods discussed below are essential to minimize additional sources of Hydrogen Sulfide absorption from inhalation. Strict compliance with these provisions can virtually eliminate several sources of Hydrogen Sulfide exposure that significantly contribute to excessive Hydrogen Sulfide absorption.

6.4.1 Review the site specific safety programs as well as the site emergency action plan.

6.4.2 Ventilation systems may provide for venting of the Hydrogen Sulfide vapor prior to entrance into the area.

6.4.3 Confined Space Entry Procedures will greatly reduce the hazards to employees and should be followed whenever entry into a confined space is required. For further details, review the ELITE Construcciones SL Confined

Space Entry program.

6.4.4 Respiratory Protection shall be used in combination with continuous monitoring when warranted by the conditions of the area.

6.4.4.1 Exposure to hazardous materials requires special precautions against absorption of toxic compounds. While engineering controls(e.g. ventilation systems) are the primary means of controlling materials such

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as Hydrogen Sulfide vapors, it is often necessary to rely on respiratory protection. The respirator will give you the proper amount of protection based on the nature of the hazard.

Only use respirators tested and certified by the National Institute for Occupational Safety & Health (NIOSH).

6.4.4.2 The cartridges that come with the mask are approved for the environment in which you will be working.

6.4.4.3 Never use a cartridge respirator in an atmosphere containing less than 19.5% oxygen or an atmosphere immediately dangerous to life and health (IDLH). In addition, observe the requirements of the

6.4.4.4 Respiratory Protection Program. In extreme cases an OSHA certified air purifying respirators may be required. Protective Equipment required to protect personnel is to be supplied at no cost to the employees.

6.4.4.5 If Self-contained breathing apparatus is to be worn, all provisions applicable to the use of respirators apply as well as the as the provisions of the ELITE Construcciones Respiratory protection program.

6.4.4.6 If at any time the alarm sounds or there is an equipment malfunction. The area is to be evacuated and re-evaluated prior to re-entry.


6.4.5 Gas detection equipment shall be used whenever an entry into an area which may contain hydrogen Sulfide vapor.

6.4.5.1 Equipment shall be operated per the manufacturer's instructions.

6.4.5.2 Detection equipment shall be calibrated prior to use and on a schedule per the manufacturer's instructions.

6.4.5.3 Continuous monitoring shall be used when Hydrogen Sulfide has been detected.

6.4.6 Protective work clothing and equipment must be worn when the exposure to Hydrogen Sulfide and Hydrogen Sulfide compounds is above the PEL. If work clothing is provided, it will be given to you in a clean and dry condition. Protective work clothing and equipment can include coveralls, type coveralls, gloves, hats, shoes, shoe coverlets, and / or full face respirators. All

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clothing and equipment will be repaired, replaced, cleaned, laundered, or disposed of as necessary by the company. Contaminated work clothing and equipment must be removed in the designated change room and placed in the provided closed containers to be cleaned or disposed of. At no time may Hydrogen Sulfide be removed from protective clothing or equipment by any means which disperses Hydrogen Sulfide into the workplace air.

7. EMPLOYEE INFORMATION & TRAINING

7.1 Annual training will be conducted per the ELITE Construcciones Safety Program. Information and training will be given to all employees who may be exposed to Hydrogen Sulfide. The training program will inform employees of the following:

7.1.1 The characteristics, possible sources, and hazards of Hydrogen Sulfide.

7.1.2 Proper use of the Hydrogen Sulfide detection methods.

7.1.3 Recognition of, and proper response to, Hydrogen Sulfide warnings.

7.1.4 Symptoms of Hydrogen Sulfide exposure.

7.1.5 Proper rescue techniques and first-aid procedures to be used in a Hydrogen Sulfide exposure.

7.1.6 Proper use and maintenance of personal protective equipment.

Demonstrated proficiency in using PPE should be required.

7.1.7 Wind direction awareness.

7.1.8 Use of safety equipment.

7.1.9 Use and operation of all Hydrogen Sulfide monitoring systems.

7.1.10 corrective action.

7.2 Site specific training will be conducted by the site foreman and per the Elite Construcciones Safety Program. Information and training will be given to all employees (Elite Construcciones SL and Sub-contractors) who may be exposed to Hydrogen Sulfide. The training program will inform employees of the following:

7.2.1 Emergency response procedures and shutdown procedures.

7.2.2 Locations of safety equipment.

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7.2.3 Confined space and enclosed facility entry procedures.

7.2.4 Routes of egress.

7.2.5 Worker awareness and understanding of workplace practices and maintenance procedures to protect personnel from exposure to hydrogen sulfide.

7.2.6 Facility sources of Hydrogen Sulfide.

7.3 Documentation of employee information and training is kept on file at the Elite Construcciones Safety department office.

8. RECORD KEEPING

The following records will be kept on file at the corporate office, if applicable:

8.1 Exposure monitoring for airborne Hydrogen Sulfide

8.2 Name and job classification of employees measured

8.3 Details of the sampling and analytic techniques

8.4 Results of the sampling



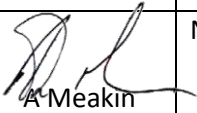
8.5 Type of respiratory equipment worn

9. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	20 Aug 2012	<i>(signed)</i> S Carangalan	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	20 Jan 2015	<i>(signed)</i> H Nuñez	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Frequency of training added
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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2. PURPOSE

The purpose of this procedure is to ensure that all ELITE personnel and contractor shall be aware of the existing hazards and the safety precaution shall be in placed when handling various types of materials.

3. SCOPE

This procedure applies to all ELITE CONSTRUCCIONES SL facilities and work location that perform any duties on an any operations that may require employees to push, pull, lift, carry, move or lower any object or person manually.

4. RESPONSIBILITY

4.1. Senior management shall;

4.1.1. Responsible for the implementation of this procedure on the project.

4.1.2. Ensuring that risk assessments are reviewed and conducted for identified hazardous manual handling tasks.

4.1.3. Complying with legislation relating manual handling.

4.2. Site Supervisors shall;

4.2.1. Recognize potential manual handling hazard that their employees may face and to involve their affected employees in this program.

4.2.2. Ensure that all manual handling operations are assessed and controlled as laid out in this procedure.

4.2.3. Ensure that all accidents, incidents and near misses related to manual handling are reported immediately not later than 24 hours.

4.2.4 Ensure that any personal protective equipment provided is worn and that it does not hinder safe working practice.

4.3. Affected Employees shall;

4.3.1. Follow the program requirements outlined in this policy and standard procedures required by their department for the work activities they are involved with.

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4.3.2. Notify their supervisor when questions arise surrounding safe procedures, the need for personal protective equipment and difficulties complying with requirements.

4.3.3. Attend any Manual Handling training that is required of them.

4.3.4. Report all accidents and near misses that they witness or incur. This will help the ELITE CONSTRUCCIONES SL to improve safe practices.

5. DEFINITIONS

Manual Handling Operations – The Regulations apply to the manual handling of loads, i.e. by human effort, as opposed to mechanical handling by crane, lift trucks etc. The human effort may be applied directly to the load, or indirectly by hauling on a rope or pulling on a lever. Introducing mechanical assistance may reduce but not eliminate manual handling since human effort is still required to move, steady or position the load. Manual handling includes both transporting a load and supporting a load in a static posture. The load may be moved or supported by the hands or any other part of the body, for example, the shoulder. Manual handling also includes the intentional dropping of a load and the throwing of a load, whether into a container or from one person to another. The application of human effort for a purpose other than transporting or supporting a load is not a manual handling operation. For example, turning the starting handle of an engine or lifting a control lever on a machine is not manual handling, nor is the action of pulling on a rope while lashing down cargo on the back of a vehicle.

Load - A load in this context must be a discrete movable object. This can be a person, animal or inanimate object, but not an implement, tool or machine whilst being used for its intended use.

6. PROCEDURE

6.1 Hazard Identification

Hazard identification may be carried out for a group of tasks rather than for individual tasks if all the tasks in the group are similar and does not result in the employee being subject to any greater, additional or different risk. Following type of injuries related to manual handling must be considered during hazard identification:

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- Repetitive Strain Injuries
- Muscle Injuries
- Tendon and Ligament injuries
- Bone Injuries
- Injuries from falling objects
- Pinch points

6.2 Risk Control

6.2.1 If possible avoid manual handling operations

The first thing to consider is whether manual handling operation can be avoided altogether. This will then mean that a further assessment is not required if the operations can easily be avoided or the appropriate steps to reduce any risk of injury to the lowest level reasonably practicable.

6.2.2 Carrying out an assessment of any manual handling operations that cannot be avoided.

Manual Handling assessments should be carried out for all remaining operations. Assessments must consider the following:

- The task
- The load
- The Working Environment
- Individual capability and
- Other factors e.g. the wearing of personal protective equipment

6.2.3 Provision of mechanical assistance.

Having completed the assessment, it is important to look to see if the risk of injury from those operations can be reduced further, so far as is reasonably practicable. Investigate providing trolleys, rucksacks or hoists, remembering that it may still be necessary to load and unload material into or onto these aids.

6.3 Manual Handling Safe Work Practice

6.3.1 Lifting Light objects from low levels

6.3.1.1 Process to be followed

1. Check the way/path travelled is clear

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2. Approach the load and size it up (weight, size and shape). Consider your ability to handle the load. If in doubt, get assistance. Use foot protection.
3. Place feet close to object to be lifted. Adopt a balanced position, one foot beside the load pointing in the direction of travel, the other behind the load.
4. Bend knees to comfortable degree and get a good handhold. Maintain normal spinal curves. Always bend your knees not your back.
5. Tighten stomach muscles. Commence to lift the load keeping it close to the body.
6. Lift the load using leg muscles and allow the load to rest in fully

6.3.1.2 Precautions

- Always bend your knees when lifting from low levels
- Move your feet when turning. Do not twist your back
- For any objects that are an awkward shape or size or are difficult to grasp always
- use mechanical assistance such as a trolley or team lifting arrangements

6.3.2 Manual Team lifting

6.3.2.1 Process to be followed

- Follow same principles as standard lifting technique
- One person should coordinate the lift making sure all team member follow safe lifting techniques and that all members are comfortable before lifting
- All members must lift at the same time
- Double the people does not mean double the capacity.

6.3.2.2 Precautions

- Avoid forward bending and sideways bending of the back
- Avoid twisting of the back

6.3.3 Overhead Loads

6.3.3.1 Process to be followed

- Do not attempt to lift heavy or awkward items alone
- Always use a step-stool or ladder to avoid over reaching
- Test weight before removing shelf
- Slide object toward you

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- Hold load close body as you descend

6.3.3.2 Precautions

- Avoid forward bending and sideways bending of the back
- Avoid twisting of the back

6.3.4 Using Trolleys

6.3.4.1 Process to be followed

- Hold the trolley as low as possible and use your leg muscles to push the load
- Pushing is easier than pulling
- IF YOU MUST PULL A TROLLEY; - Face the object squarely, with feet shoulder width apart (one foot in front of the other), keep your back straight, bend your knees slightly and pull in a smooth motion.
- When loading and unloading the trolley ensure that you move your feet to turn. Do not twist your back.
- Make sure the load as close as possible before lifting
- Always remember to bend the knees when lifting objects that below waist level.

6.3.4.2 Precautions

- Avoid forward bending and sideways bending of the back
- Avoid twisting of the back

6.3.5 Carrying Loads

6.3.5.1 Process to be followed

- Never walk with items stacked so high that your vision is obstructed
- Do not stack items so they are unstable
- Check to see if your pathway is clear
- Hold load close

7. EMPLOYEES TRAINING

7.1 Classroom and visual presentation are the method use to share the information.

7.2 Assessment are given at the end of the presentation to ensure that employee fully understand with ELITE Manual Handling Safety procedure.

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7.3 An employee must get a grade not less than 80% of the examination to pass the assessment. In the event that an employee could not pass in the first assessment, a second chance is given to attend again the presentation and retake the exam on a given schedule. And, if the employee fails again he could not take another exam until three (3) months off period.

7.4 Annual training/refresher will be conducted and evaluated to maintain employee's knowledge and awareness with regards to ELITE Manual Handling Safety procedure.


7.5 English and Spanish Languages are separately used in visual presentation to ensure that all ELITE employees and contractors (Expats and Nationals) understand the Manual Handling safety procedure presentation.

8. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	02 Apr 2017	<i>(signed)</i> A Lapuz	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
1	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
2	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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2. PURPOSE

The purpose of this Abrasive Blasting program is to prevent occupational health hazard associated with the activity to ELITE CONSTRUCCIONES SL employee and comply with the OSHA Standard 29 CFR 1910.95 – Occupational Noise Exposure. OSHA's Hazard Communication standard ([29 CFR 1910.1200](#)). OSHA Respiratory Protection standard ([29 CFR 1910.134](#))

3. SCOPE

This procedure applies to all ELITE CONSTRUCCION SL facilities and work locations that involve abrasive blasting activities.

This written procedure includes but not limited to:

- Occupational Noise exposure
- Required monitoring
- Audiometric Test
- Hearing Protection
- Respiratory Protection
- Hazardous Chemical Communication
- Exposure Limit
- Control Measures
- Employee education and Training
- Record Keeping

4. RESPONSIBILITY

4.1. Supervisor/Department

- Notifying Health, Safety and Environment (HSE) of noise complaints or potential noise hazards.
- Notifying Health, Safety and Environment (HSE) of complaint on exposure and potential hazards of abrasive blasting other than those mentioned in this document.
- Ensuring that employees are provided with required hearing protectors.
- Ensuring that employees properly use and care for hearing protectors.
- Ensuring that employees are provided with required respiratory protection .
- Ensuring that employees properly use and care for respirators.
- Ensuring that noise-hazardous equipment/areas are properly labeled or posted (greater than or equal to 85 dBA operating noise level).
- Notifying Health, Safety and Environment (HSE) of process, materials or equipment changes that may alter noise exposures.
- Notifying Health, Safety and Environment (HSE) of process, materials or equipment changes that may alter respiratory exposure.
- Ensuring that potentially overexposed employees are provided with a baseline audiometric hearing test prior to the initial work assignment and then annually thereafter. High noise exposure must be avoided for 14 hours prior to an exam.

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- Enforcing the use of hearing protectors or noise reduction procedures in the designated areas/assignments.
- Enforcing the use of respirators and controlling exposure procedures in the designated areas/assignments.
- Ensuring new employee HCP orientation/training and annual refresher HCP training of employees are provided to all potentially overexposed personnel.

- Maintaining the following records (see Record Keeping 9.10):
 - Name and job classification of the employee in the HCP
 - Audiometric test results from our Occupational Health Provider
 - Noise exposure assessments from EH&S
 - Training documentation

4.2. Environmental Health and Safety (EH&S)

- Administering the Hearing Conservation Program.
- Workplace and employee noise evaluation:
 - noise assessment to determine if administrative and engineering controls are needed, and how they should be implemented.
 - identification of areas or processes that require noise abatement and/or posting
 - identification of areas or processes that require respiratory protection and dust control measures.
 - evaluation and periodic re-evaluation of employees' exposure, by job classification, to determine which job titles need to be included in the Hearing Conservation Program.
- Maintaining records of employee exposure measurements.
- Providing comprehensive annual training on HCP and HPDs.
- Assist employees in selecting the proper HPDs and provide instruction on their use.

4.3. Employees

- Wearing hearing protection devices and following any noise reduction procedures as required.
- Storing and maintaining Hearing Protection Device(s) in a clean and sanitary manner.
- Storing and maintaining respirators (s) in a clean and sanitary manner
- Reporting noise hazards and hearing protector problems to their supervisor.
- Attending required training sessions on Hearing Conservation Program.

5. DEFINITIONS AND ACRONYMS

Action Level: An 8-hour time-weighted average of 85 decibels A-weighted (85 dbA 8-hr TWA) established by CAL/OSHA.

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Administrative Controls: Methods that limit an employee’s exposure time to noise. This includes assigning the employee to less noisy areas in the workplace for a certain length of time so the employee shall not exceed the action level.

Audiogram Testing: Exams that measure the sensitivity of a person's hearing threshold in decibels as a function of frequency.

Audiometer: An instrument for measuring the threshold or sensitivity of hearing.

Audiologist: A professional specializing in the study and rehabilitation of hearing, who is certified by the American Speech-Language-Hearing Association or licensed by a state board of examiners.

Baseline Audiogram: An audiogram obtained after 14 hours of quiet. The audiogram against which future audiograms are compared.

Continuous Noise: Noise levels that vary with intervals of one second or less.

Decibels (dB): A measure of the sound level (loudness). The decibel scale is a logarithmic scale; as an example, a 90 dB noise is ten times louder than a 80 dB noise.

Decibels, A-Weighted (dBA): The A weighted is the scale used for most occupational noise measurements. The A weighting approximates the range of human hearing by reducing the effects of lower and higher frequency noises with respect to the medium frequencies.

Decibels, C-Weighted (dBC): The C weighted scale filters include both high and low frequency noise and are used for impact noise and in the selection of hearing protection.

Engineering Controls: May include purchasing quieter equipment using barriers, damping, isolating, muffling, installing noise adsorption material, mechanical isolation, variations in force, pressure or driving speed or any combination of methods to decrease noise levels.

Frequency: A sound's pitch measured in hertz (hz); high pitches are high frequency sounds.

Hearing Conservation Program (HCP): Program established when employees are exposed to noise exceeding the Action Level. Program must include noise surveys, audiometric testing, hearing protectors, training, and recordkeeping requirements.

Hearing Protection Devices (HPD's): Personal protective equipment that is designed to be worn in the ear canal or over the ear to reduce the sound level reaching the ear drum. Examples include ear muffs or plugs.

Hearing Threshold Level (HTL): The lowest threshold that the employee can hear the test tone during an audiometric test. The HTL's are recorded on the employee's audiogram.

Hertz (Hz): A unit of measurement of frequency, expressed as cycles per second.

Impulse/Impact Noise: Noise that is a sharp burst of sound, generally less than one-half second in duration, that does not repeat itself more than once per second.

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Noise: Unwanted sound.

Noise Dosimeter: An instrument worn by an individual that integrates the sound level exposure over a period of time.

Noise Reduction Rating (NRR): The Noise Reduction Rating of hearing protection devices (HPD) indicates the theoretical amount of reduction of noise levels that can be achieved if the HPD is worn correctly. This rating is shown on the HPD packaging.

Otolaryngologist: A physician specializing in diagnosis and treatment of disorders of the ear, nose and throat.

Permissible Exposure Limit (PEL): 90 dBA 8-hr TWA.

Pitch: Another term for sound frequency. Higher pitches are higher frequency sounds.

Representative Exposure: Measurements of an employee's noise dose or 8-hour time weighted average sound level that is representative of the exposures of other employees in the workplace.

Sound: A vibration or pressure oscillation that is detectable by the ear drum.

Sound Level Meter: An instrument used for the measurement of noise in sound level surveys.

Speech Interference Levels (SILs): The frequencies most associated with speech, which are the 500-4000 hz (frequency) range. Vowels (a, e, i, o, u) are low frequency sounds (below 2000 hz) and consonants (b, c, d, etc) are high frequency sounds. The low frequencies are the least affected by noise. If the high frequencies are affected, t's and p's or s's and f's may be easily confused.

Standard Threshold Shift (STS): An average shift from the baseline measurement in either ear of 10 dB or more at 2000, 3000 and 4000 Hz. These frequencies are the most important frequencies in communication and the most sensitive to damage by industrial noise exposure. See Section 3.5

Stanford Risk Management for a definition of a CAL-OSHA reportable STS.

Time-Weighted Average Sound Level (8-hr TWA): That sound level, which if constant over an 8-hour exposure, would result in the same noise dose measured in an environment where noise level varies. Threshold of Pain: A noise level of 120 dB causes pain.

6. PROGRAM COMPONENTS

6.1 Noise Surveys/Monitoring

- Representative noise monitoring with a designed sampling strategy will be performed by Environmental Health and Safety to allow the identification of employees for inclusion in the Hearing Conservation Program and to enable the proper selection of hearing protection.
- All continuous, intermittent and impulsive sound levels from 80 to 130 dBA shall be integrated into the computation of an 8-hr TWA.

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- Monitoring shall be repeated when any changes occur in production, process, equipment or controls which might render the hearing protectors inadequate or require additional employees to be included in the program.
- Employees exposed at or above the action level shall be notified of the results of the monitoring.
- Employees' noise exposure shall be reassessed periodically as needed (i.e. following changes in processes, job responsibilities, equipment or when a STS is determined).

6.2 Audiometric Testing

- Audiometric testing program shall be managed by our Occupational Health Provider.
- Performing audiometric database analysis (ADBA) procedures, as defined in ANSI Standard S12.13-1991, to assess the effectiveness of hearing conservation efforts (i.e., is hearing loss being prevented).
- Baseline audiograms shall be preceded by at least 14 hours without exposure to workplace noise. This requirement may be met by wearing hearing protectors which will reduce the employee's exposure to a sound level of 80 dBA or below.
- Baseline audiograms shall be provided for the employees whose job classification are included in the Hearing Conservation Program upon employment, and annually thereafter.
- Evaluation of audiograms shall be done in compliance with CCR Title 8, section 5097(d).
- Employees shall be informed in writing within 21 days when an audiogram indicates a standard threshold shift which is determined to be work related

6.3 Hearing Protection Devices

- Exposure to high noise levels can cause permanent hearing loss. Abrasive blasting equipment can generate various noise levels that may cause workers to be exposed to noise that exceeds the exposure standard.
- The exposure standard for noise in relation to hearing loss, is defined in the WHS Regulations as an LAeq,8h of 85 dB(A) or an LC,peak of 140 dB(C). There are two parts to the exposure standard for noise because noise can either cause gradual hearing loss over a period of time or be so loud that it causes immediate hearing loss.

In the abrasive blasting industry, the main sources of noise for the operator are:

- discharge of compressed air from the blast nozzle – 112 to 119 dB (A)
 - the feed air inside the protective helmet – 94 to 102 dB (A)
 - blast cabinets – 90 to 101 dB (A)
 - air compressors – 85 to 88 dB(A).
- Maximum noise levels up to 137dB(A) have been measured at the operator's position during blasting activities when the abrasive runs out.

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- Operators of small abrasive blasting cabinets are particularly at risk. They may not perceive the noise to be damaging because of the relatively short periods of use. However, average noise levels at the operator's ears have been measured between 90 - 101 dB (A). This means that at 101 dB(A), for instance, an exposure of unprotected ears of only 12 minutes is allowed in any eight hour shift so as not to exceed the exposure standard of LAeq,8h 85 dB(A). Following such exposure, other work activities must not contribute to further noise exposure.
- Unprotected workers and others close to the blasting process may also be exposed to excessive noise.
- Employees exposed to noise levels at or above an 8-hour TWA of 90 dBA shall wear hearing protectors. Employees exposed to noise levels at or above the action level of an 8-hour TWA of 85 dBA shall wear hearing protectors if they have experienced a documented standard threshold shift or have not obtained a baseline audiogram.
- Hearing protectors shall be available to all employees exposed to noise levels at or above the action level of 85 dBA, 8-hr TWA, at no cost to the employees
- Employees shall be given the opportunity to select their hearing protectors from a variety of suitable types.
- Proper initial fitting and supervision of the correct use of hearing protectors shall be provided.
- Hearing protector attenuation shall be evaluated for the specific noise environments in which the protector will be used. The methods used for measuring attenuation shall be one of the four methods described in CCR Title 8, Section 5098, Appendix E.
 - Hearing protectors must attenuate the noise level to an 8-hour TWA of 90 dBA or less.
 - For employees who have experienced a standard threshold shift, the attenuation must reduce the sound level to an 8-hour TWA of 85 dBA or less.
 - Re-evaluation of hearing protectors shall be done whenever a workplace noise level increase renders the hearing protector's attenuation inadequate.
 - Workplaces in which the noise level exceeds 85 dBA shall have signs posted. Signs shall read "Hearing Protectors Required".

6.4 . Respirators

- Workers engaged in abrasive blasting should be supplied with and wear an airline positive pressure hood or helmet fitted with an inner bib and a high visibility shoulder cape, jacket or protective suit.
- Respirator helmets must be supplied with breathing air of an adequate quality. If the air is supplied from compressed air cylinders, the source should be fitted with an alarm device that warns the wearer or an attendant when the cylinder pressure falls below a predetermined level. For information on air quality refer to AS/NZS 1715: *Selection, use and maintenance of respiratory protective equipment*.

Any air-fed respirator should have an alarm that warns and logs the incidence of carbon monoxide gas.
- An air purifying respirator should also be worn by the pot attendant and any other person within the work area while abrasive blasting is in progress, during maintenance or repair work or during the clean-up of dust. For further information refer to AS/NZS 1716: *Respiratory protective devices*.

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- Care should be taken to ensure breathing air lines cannot be run over by vehicles or damaged by the blasting process. Air intakes to breathing air compressors should be situated well away from sources of contaminants, particularly exhaust gases from mobile liquid fuel engines, or areas where exhaust fumes may accumulate.
- Respirators should be fitted for each person individually and if one is to be used by another operator, it should be disinfected and refitted before use. The tightness of all connections and the condition of the face piece, headbands and valves should be checked before each use.
- Respirators should be selected, fitted, used and maintained in accordance with the manufacturer's instructions. For further information also refer to AS/NZS 1715: *Selection, use and maintenance of respiratory protective equipment*.

6.5 Protective clothing

- To keep out dust and abrasive grit, protective suits or clothing should be worn and should have leather or elastic straps at the wrist and ankles and overlapping flaps at all suit closures.
- Protective gloves should be industrial safety gloves or mittens of an appropriate material to reduce penetration of particulate matter. For further information refer to AS/NZS 2161: *Occupational protective gloves*.
- Protective footwear should be made of material which reduces penetration from particulate matter, and where appropriate, should be waterproof. For further information refer to AS/NZS 2210: *Occupational protective footwear*.

If disposable clothing is worn, the clothing should be appropriately disposed of after use, without risk to the safety and health of others.

6.6 Helmets and eye protection

- Helmets will provide protection from flying fragments to the eyes, head and neck.
- Helmets should not be held or hung up by the air feed hose, dropped or left in areas where they might be exposed to dust and dirt or be subject to distortion. After removing the helmet, dust should be vacuumed and the cleaned helmet placed in an airtight plastic bag. It should be stored in a dust-free area, away from direct sunlight. At least once a week, the inside of the helmet should be washed with warm water and mild detergent.

6.7 Hazards and Control Measures

6.7.1 Heat

- Heat is also a common hazard associated with carrying out abrasive blasting. Workers are at risk of heat strain due to working in hot, poorly ventilated or confined spaces and the type of personal protective equipment that is worn, for example blast helmets, protective suits or leather coveralls.
- Heat strain is a serious medical condition which could lead to heat exhaustion and death.
- When assessing the risks associated with heat, you should consider a number of factors including the workplace temperature, humidity, air movement, exposure to sources of heat,

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the work demands, how much clothing is worn (including PPE), individual risk factors, and whether the worker is acclimatised to the conditions.

CONTROL MEASURES

- fitting cooling devices to the air supply of blast helmets
- providing PPE that is selected and fitted to minimise the build up of heat and wearing cotton undergarments
- providing a cool, well-ventilated area where workers can take rest breaks or carry out other tasks
- scheduling work so that abrasive blasting is done at cooler times
- ensuring cool drinking water is readily available

6.7.2 Vibration

- The force of the abrasive moving through the blast hose transmits vibration to the hands and arms of operators holding the equipment. Prolonged use of abrasive blasting equipment may lead to a condition known as occupational Raynaud's disease (also called white finger or dead finger). It results from persistent microscopic damage to nerves and blood capillaries. It may also cause carpal tunnel syndrome.

Symptoms include:

blanching (whiteness) and numbness in the fingers
 fingers are cold to touch
 loss of dexterity or increased clumsiness
 decreased sensitivity to touch, temperature and pain, and
 loss of muscular control.

- Chronic exposure may result in gangrenous and necrotic changes in the finger. The condition may take months or years to develop. There is no effective treatment to reverse the effects of white finger.
- The risk of injury or disease from vibration will vary depending on the equipment being used, the intensity of the vibration, frequency and duration of exposure, the force of grip applied by the worker, maintenance of the equipment and insulation provided by protective gloves.
- Further information on measuring exposure to hand/arm vibration is available in AS 2763: *Vibration and shock – Hand transmitted vibration – guidelines for the measurement and assessment of human exposure.*

CONTROL MEASURES

- Using an alternative method to clean or prepare surfaces, where possible
- Using engineering controls, for example vibration-reduced equipment such as vibration isolating handles incorporated into blasting nozzles and/or supports to reduce the pressure of the hand to control the nozzle
- Using administrative controls, for example reducing the amount of time an operator is required to operate a blast nozzle by job rotation or more frequent breaks. Frequent maintenance of equipment may also reduce the level of vibration

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- Using PPE, for example vibration absorbing gloves may assist in dampening vibration.

6.7.3 Manual tasks

- Abrasive blasting may result in musculoskeletal disorders from performing hazardous manual tasks, for example:
 - back strain from lifting or pushing
 - muscle strain from working in awkward positions
 - strain from hose whip
 - Occupational Overuse Syndrome from controlling the blast hose
- Ways of reducing the risk of musculoskeletal disorders include
 - appropriately designed plant and hoses which are tied to prevent hose whip
 - ensuring workers do not have to perform manual tasks in excess of their capability
 - reducing the amount of force necessary to perform tasks, for example, fixing wheels to heavy equipment, and moving heavy objects into and out of blasting chambers by using specially designed equipment
 - job rotation

6.8 Employee Education and Training

- Annual training is required for all employees exposed to noise at or above an 8-hour TWA of 85 dBA.
- The training shall cover the following information:
 - The effects of noise on hearing.
 - The effect of respirable and inhalable dust.
 - Crystalline silica acute and chronic effect to human health.
 - Controlling Hazard and Control Measure associated with Abrasive Blasting.
 - Hazardous Material labels and pictograms
 - The purpose, advantages, disadvantages, and attenuation of various types of hearing protectors.
 - Instruction of proper fitting and care of protectors and respirators
 - The purpose and procedures of audiometric testing.
- Any informational materials pertaining to this standard that are supplied by OSHA shall be available to the affected employees.

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6. 9. Record Keeping

- Noise exposure measurement records shall be retained for at least 2 years by Environmental Health and Safety.
- Audiometric test records provided by our Occupational Health Provider should be maintained by departments with employees enrolled in the Hearing Conservation

Program and shall include :



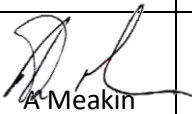
- the name and job classification of the employee
 - the date of the audiogram
 - the examiner's name
 - the employee's most recent noise exposure assessment
 - the date of the last acoustic or exhaustive calibration of the audiometer and the measurement of the background sound pressure levels in the audiometric test rooms.
- Records of audiometric test results shall be retained for the duration of the affected employee's employment.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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1. APPROVAL AND REVISION RECORD

Rev No.	Date of Revision	Prepared by:	Reviewed by:	Approved by:	Revision Notes
0	17 Apr 2017	<i>(signed)</i> A Lapuz	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	First issuance
2	30 Dec 2018	<i>(signed)</i> M Caceres	<i>(signed)</i> K Richardson	<i>(signed)</i> A Meakin	Revised the evaluation period from 1 year to 3 years. Updated the format.
3	30 Dec 2021	 M Caceres	 K Richardson	 A Meakin	No revision

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2. INTRODUCTION

This document details the safety guideline in rigging and the use of slings.

3. PURPOSE

The purpose of this procedure is to ensure that lifting and rigging works are performed in a safe and controlled manner.

4. SCOPE

This lifting and rigging procedure covers work performed by Elite employees, contractors and third party service provider within the company's area of operational control.

5. DEFINITIONS

Anti-Two Block (Dead Heading Limit Switch) – These are electrical sensing devices that are installed on the crane to prevent the main and auxiliary hoist from hitting the sheave.

Blind Lift - This is any lift where the Qualified Crane Operator does not have visual contact with all or part of the object being moved.

Binding Gears - is used for the transportation of equipment (e.g. tubular) to and from onshore sites and should only be used for this purpose e.g. ratchet-type binder, ratchet belt, binding chain.

Complicated/Complex Lifts - lifts which are difficult because of the nature of the load, e.g., awkward shape, offset or high centre of gravity, fragile, containing liquids, no lifting attachments/difficult to sling, etc. The actual lifting operation/handling of the lift may also be difficult, e.g., it may require rotation or being cross-hauled involving two or more sets of rigging and/or tandem lifting with cranes.

Cranes - Lifting devices that are capable of being dynamically loaded when lifting, loading or shifting loads by means of a projecting and/or swinging boom and movable lifting blocks.

Crawler Crane – crane that consisting of rotating super structure with a power plant operating machinery and boom (telescopic or lattice), mounted on base and equipped with crawler treads for travel.

Truck mounted crane- A crane consisting of a rotating superstructure (center post or turn table) boom (telescopic or lattice), operating machinery, and one or more operator's station mounted on frame attached to a commercial truck chassis, usually retaining a payload hauling capacity whose power usually powers the crane.

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Mobile Crane – A crane consisting of a rotating super structure (center post or turn table), boom (telescopic or lattice) operating machinery, and one or more operators station mounted on a crane carrier equipped with axles and rubber tire wheel for travel.

Critical Lifts – The following lifting shall be designated as critical lifts:

- Lifting over live operating lines or equipment
- Lifting in a congested area where structures, pipe racks or other obstacles may be involved
- Lifting in area where poor soil or unknown underground condition exist
- Lifting near energized electric power lines
- Lifting whenever it involves turning of the load vertically
- Lifting with two or more cranes at one time (tandem lift)
- Lifting of personnel in baskets, etc.
- Lifting, if there is potential for a collision, upset, or dropping could result in damage to equipment, injury to personnel, an unacceptable delay in the schedule, or to other significant program impacts such as loss of vital data
- Lifting using web sling

Hoist - A hoist (including pneumatic-powered lifting equipment, lever hoists) is a chain or electric lifting device, usually attached to a trolley, which travels along a monorail or bridge crane. A hoist may also be a chain or electric lifting device that is affixed to a stationary point.

Inspection - a periodic evaluation where the results are compared to specific requirements of the standard. An inspection consists of procedure, defined frequency and testing, documentation of tests and inspections and correction of identified deficiencies.

Lifting Plan – A plan that is required for every Complicated or Critical Lift to ensure the safe load lifting. The load being lifted should not exceed the maximum lift radius and the capacity of the crane for all conditions encountered during the lift

Load block-upper - The assembly of shackle, swivel, sheaves, pins, and frame suspended from the boom point

Load Chart - A table that summarizes the crane static, dynamic, and personnel handling load capacities at various boom angles, radii, and reeving configurations. The load chart will include boom length, cable size, and weight of block, crane model, and serial number.

Outriggers - Are the extendable (or fixed) metal arms attached to the crane mounting base and which rest on supports on the outer end. When the outriggers are extended (and supported), they level and stabilize the crane.

Passenger Pickup Truck Mounted Crane (Boom truck) – A purpose built crane of rated capacity of 3200 pounds (1450 kgs) or less that is permanently mounted on a passenger pickup truck of one ton or less size.

Qualified Crane Inspector – A third party service provider trained and experienced to inspect and certify cranes, holding appropriate certificate and authorized by EG Government.

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Qualified Rigging and Lifting Inspector – A third party service provider with documented training and experience to inspect and certify lifting and rigging equipment, holding appropriate certificate and authorized by EG Government

Qualified Crane Operator - An individual with training and experience who has successfully completed an appropriate rigging and qualified crane operator crane skills training course. The qualified crane operator shall hold a qualification card for the type and capacity of crane that they are operating, issued by all relevant Government Bodies within jurisdiction where operations are being conducted.

Critical Lift Controller - The Critical Lift Controller (Operations Manager) reviews and approves the Lifting Plan and Job Safety Analysis (JSA) for this work. He will assess the level of risk involved and determine whether or not the risk has been sufficiently mitigated. The Critical Lift Controller or his designee must be on site.

Qualified Rigger - Is a trained and experienced person that has successfully completed an appropriate rigging training course and a rigger skills training course.

Rigging - Rigging refers to two things: the process of safely moving loads with slings, hoists, jacks, and other types of lifting equipment and the equipment used to lift and move these loads.

Routine Lifts - Routine lifts are uncomplicated lifts that are performed on a regular basis using fixed, dedicated lifting equipment. Essentially, this type of lift consists of normal crane operations within the installation and to or from supply vessels. i.e. lifting from v-door, pipe ramp, catwalk and pipe rack.

Safety Factor - The ratio of a failure-producing load to the maximum safe stress a material can carry. To calculate the safety factor, divide the breaking strength by the safe working load.

Safe Working Load - The safe working load (SWL) is the maximum load that may be imposed on a piece of lifting equipment. The actual load must not exceed the SWL.

Rigger - A Rigger (has completed rigging & slinging course) designated by the Work Group Supervisor to guide the lifting appliance operator using either hand signals or two-way radio.

Sling - The piece of equipment used to connect the load to the main hook or stinger.

Stinger/Single Leg Sling/Crane Pennant - Is a single multi-leg wire rope sling equipped with a hook fitted with a safety latch and a master link the other end. It is used to keep the main hoist load block or auxiliary hoist headache ball from coming in contact with personnel.

Tag Line - The tag line is a length of rope attached to the load that is used by the qualified riggers to aid in the control of the load.

Two-Blocking (Dead Heading) - Occurs when the load block or auxiliary line ball is pulled up into the boom tip sheaves. The most common occurrence is when a hydraulic boom is extended without lowering the hoist line. This can also occur when the load block is positioned near the boom tip sheaves and the boom is lowered without lowering the load block.

6. ROLES AND RESPONSIBILITIES

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There must be clearly defined roles, and personnel must meet the training and competency requirements of this standard prior to starting work. Local regulations will specify additional training and competency requirements.

A single individual may fulfill more than one role as long as he or she meets the competency requirements and is able to fully meet multiple responsibilities.

The following roles and responsibilities are specific to lifting and rigging:

Qualified Crane Operator

- Conducts pre-use of crane and ensures that the equipment is in good condition.
- Checks area for obstruction (overhead electrical cables, existing structures, populated areas, vehicles and equipment, etc) before crane set up.
- Ensures that the crane is set up in a firm and level ground
- Maintains good communication with the rigger/signal man.
- Ensures that crane is lifting within SWL.
- Exercise Stop Work Authority for all substandard lifting practices.

Qualified Rigger/Signalman

- Conducts pre-use inspection of lifting gears and accessories
- Ensure proper rigging practices is implemented before, during and after the lift.
- Acts as signal man during crane positioning.
- Ensures there is no loose item that has a tendency to fall during lifting.
- Ensures housekeeping of lifting gears and accessories after use.
- Isolate the lifting perimeter to unauthorized personnel.
- Ensures a tag line is used to control the load.
- Maintains good communication with the crane operator.
- Wear required PPEs (ie; helmet, safety shoes, safety glasses, gloves and hi-visibility vest.)
- Exercise Stop Work Authority for all substandard lifting practices.

Lift Supervisor

- Ensures crane equipment, lifting gears and accessories are 3rd Party certified.
- Ensures that crane operator and rigger are certified and accredited training provider and possess valid licenses.
- Prepares Job Safety Analysis and Lift plan and secures Lifting Permit.
- Conducts Pre-Job Safety Meeting.
- Maintains supervision throughout the lift.
- Prepares MOC in case of change or deviation from original plan has occurred.
- Facilitates close out of Lifting Permit.
- Executes Stop Work Authority for all substandard lifting practices.

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7. GENERAL REQUIREMENTS

1. Hazards associated with Lifting and Rigging shall be identified and mitigated before the work begins.
2. Competent personnel must complete (i.e., develop lifting plan as required) the steps needed to properly and safely prepare the job site and equipment for the start of work. Determine if the lift to be made is critical or not.
3. Ensure lifting and rigging equipment is certified for current use and in good working condition (pre-use inspection).
4. Confirm weight of the object and establish the load's center of gravity before the lift begins.
5. Establish clear pick-up and lay-down areas that are within the crane's safe load lifting radius.
6. Ensure the load path from the beginning of the lift to the lay-down area is clear of obstructions.
7. Loads appropriately and ensure loads are free of possible restraints.
8. Place load in designated lay-down area and remove rigging equipment after load is securely in place and free of support from the crane.
9. Crane operator must be certified by all relevant Government Bodies within jurisdiction where operations are being conducted.
10. A Pre-Job Safety Meeting shall be conducted.

8. TRAINING REQUIREMENT

Third Party Service Provider will conduct skills and competency training to personnel prior to work engagement. Emphasis on training of the workforce should be directed at five areas

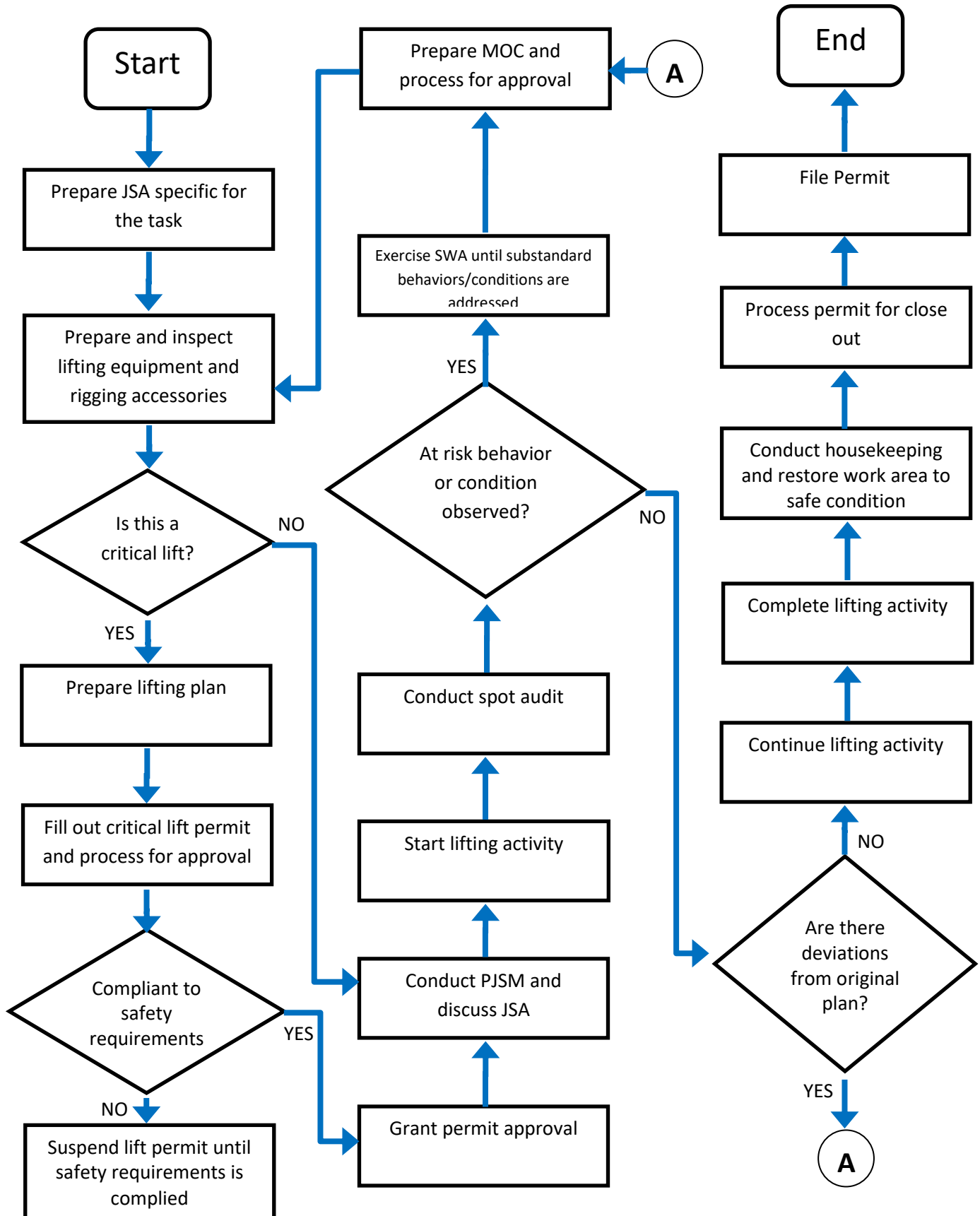
- Load lift plan
- Load hook-up
- Load movement signaling
- Hoisting equipment
- Crane Operators

Note: National certification for operator and riggers or equivalent may be considered as equivalent to the above training details.

9. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

PROCEDURE AND PROCESS FLOW



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ACTION GUIDE	RESPONSIBLE
1. Verify validity of 3 rd party certification of crane and lifting accessories.	Lift Supervisor
2. Verify competency of crane operator and rigger.	Lift Supervisor
3. Determine the size, shape and weight of the load to be lifted, where it will be lifted from, where it will be placed.	Lift Supervisor and Crane Operator
4. Identify the lifting gears to be used e.g. shackles, hooks, slings.	Lift Supervisor and Rigger
5. Conduct Pre Use Inspection of Crane and Lifting accessories.	Crane Operator and Rigger
6. Survey lifting area and determine the crane position, lifting radius, boom length and boom angle.	Lift Supervisor and crane operator
7. Prepare Job Safety Analysis.	Lift Supervisor
8. Prepare lifting plan.	Lift Supervisor
9. Secure Lifting Permit. (Note: Lifting Permit and Lifting Plan are required for critical lifts)	Lift Supervisor
10. Review and validate compliance on permit requirements prior to approval	Permit Issuer and Controller
11. Conduct Pre-Job Safety Meeting and discuss Job Safety Analysis and Lifting Plan	Lift Supervisor
12. Set up crane equipment and check for the following: <ul style="list-style-type: none"> • Crane stability • Outrigger pads and mattings • Obstruction • Power lines • Rigger position (no blind spot) 	Lift Supervisor, Operator and Rigger

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- Crane Configuration (Load moment indicator, Load chart)

10. Attach rigging gears and tag line to load to be lifted.	Rigger
11. Verify loose items that could fall during the lift.	Rigger
12. Isolate the lifting area. <ul style="list-style-type: none"> • Clearing of non-essential personnel within crane boom radius • Installation of barricade tapes 	Rigger
13. Conduct load test for critical lifts (at least 6" from the ground)	Crane Operator and Rigger
14. Start the lifting activity.	Crane Operator and Rigger
15. In emergency cases, cancel the permit and reassess the condition.	Permit Controller
16. If there will be a deviation from the original intent of the permit, implement management of change process.	Lift Supervisor
17. In case there is non-compliance exposing essential personnel to imminent danger, cancel the permit.	Permit Controller
18. In cases where the activity cannot be completed within the specified time frame, the review the permit for validity of extension.	Permit Controller
19. Dismantle slings and other rigging gears after securing the load.	Rigger
20. Conduct housekeeping of lifting gears and accessories after the lift.	Rigger
21. Boom down and secure the crane.	Crane Operator
22. Process for permit closeout.	Lift Supervisor
23. Approve the permit closeout upon task completion and housekeeping	Permit Issuer and Controller
24. File Permit	HSE Advisor

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2. INTRODUCTION

2.1 Purpose

To provide all employees at all levels of the organization with the information and guidance on the company's fatigue management plan. It identifies specific hazards associated with the over-fatigue, mitigations and responsibilities of the employees.

2.2 Scope

This plan covers the specific guidelines for working hours, working breaks and shift-work of the Elite employed and contracted personnel performing activities and projects requiring 24-hour operations and works exceeding normal work shifts.

3. DEFINITIONS

Fatigue – The loss of alertness and capacity to perform safely caused by insufficient sleep or poor quality sleep, working at times when you would normally be asleep or engaging in mentally or physically demanding activities.

Breaks – A pause in work or during activity of a particular individual. Breaks can be 5 minutes to as long as 1 hour such as lunch breaks. Weekly rests shall be at least 1 day or 24 hours.

4. RESPONSIBILITIES

4.1 Employer Responsibilities

1. To provide information to new and prospective employees regarding the location of the workplace, type of work, weather conditions and working environment.
2. To establish schedule and shift change over processes which fully acquaint incoming shift workers with current operating conditions.
3. To consider the following principles in its planning, deployment and operations.
 - a. address the opportunity for quantity and quality of sleep;
 - b. ensuring that the number of consecutive shifts (in particular night shifts), shift lengths and rest periods between shifts are considered in roster compilation;
 - c. understanding that employees have a need to balance the competing requirements of their jobs with their social and domestic responsibilities;
 - d. compensating periods of extended hours with a longer break before commencing the next shift;
 - e. ensuring the number of consecutive "on call" shifts takes into consideration "occasional" or "frequency" of all call outs to determine restrictions on consecutive shifts; and
 - f. addressing the potential for secondary employment to impact employee fatigue.

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4.2 Supervisor Responsibilities

1. To be alert for signs of drowsiness on the job and insist that an in-shift break be taken when these are observed;
2. Be aware that the hours between midnight and 6.00am and the first night shift of a sequence may be particularly problematic for drowsiness;
3. Be alert for any unusual behaviour, which might indicate stress, chronic fatigue or personal problems;
4. Ensure that work rosters fall within the limits detailed above; and
5. Reporting and responding to any incidents and accidents arising from hazards associated with shift work.

4.3. Employee Responsibilities

It is the responsibility of employees at all levels to comply with this plan. All employees are required to attend work fit to safely perform their duties without risk to themselves or others. This can only be managed from a personal perspective by ensuring that an individual's time away from work includes sufficient sleep and recovery. This will include amongst other things employees managing any health, lifestyle, personal or family responsibilities that may impact on their fatigue.

Employees must:

- Present to work in a fit condition and not adversely affected by fatigue;
- Utilise breaks provided within and between shifts to rest and recuperate;
- Report all incidents and accidents arising from hazards associated with shift work;
- Recognise signs of sleep deprivation and/or fatigue and the impact on themselves and others and report to their supervisor the circumstances in which fatigue and lack of sleep are impacting on individual wellbeing and workplace safety;
- Understand the implications of voluntarily seeking additional work hours, including secondary employment, that have the potential to increase risks to individual and organisational health and safety; and
- Ensure your allocated shifts comply with this policy.

5. FATIGUE MANAGEMENT

Fatigue management is a shared responsibility between employer and employee as it involves factors that occur both in and outside of the workplace. If you are experiencing fatigue it is important to identify the factors that are contributing to fatigue, discuss any issues with your employer, make changes as required, including sleeping patterns, workloads, rosters and lifestyle behaviours and seek professional help if necessary.

5.1. Identifying Fatigue Hazards

Fatigue causes physical symptoms such as:

- Headaches,

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- Muscle aches,
- Breathing and digestive problems,
- Distraction,
- Nervousness,
- Poor judgment, and
- Slow motor skills.

Typical symptoms of tiredness, limit of endurance and co-worker fatigue are:

- A drowsy relaxed feeling,
- Short temper,
- Blurred vision,
- Difficulty keeping your eyes open,
- Head nodding,
- Head resting on a surface for example a table during breaks,
- Excessive yawning,
- Changes in voice alertness on the two-way radio,
- Poor judgement when operating equipment, and
- Arriving at a destination and not remembering how you got there.

Employees shall immediately notify their supervisor if they experience any of the above symptoms.

The supervisor shall arrange for the employee to have a short break. If the employee feels that they are too tired to continue, the supervisor shall make arrangements for the employee to be stood down for the remainder of the shift.

5.2. Addressing Fatigue Hazards

Mental and physical work demands:

1. Use plant machinery and equipment that eliminates or reduces the mental and physical demands of the job;
2. Not to exceed 3 hours of continuous use of plant machinery without a break that involves high levels of mental and physical demands, e.g. crane operations;
3. Drivers on a long drive should have at least 15-minute break every after 2 hours of continuous driving.
4. Redesign the job to include a variety of mental and physical tasks;
5. Optimise rest periods; and
6. Increase the amount of variation in work tasks to reduce repetition, e.g. job rotation or swap roles with a member of your team.

Work scheduling and planning:

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1. Ensure there are adequate numbers of people and resources to do the job without placing excessive demands on personnel; and
2. Minimise sequential night shifts.
3. Ensure that adequate rests in between shifts are provided including possible travel time from and to camp and worksite.
4. Ensure adequate time of travel is allocated for personnel travelling from base-off/vacation from other countries.

Working time:

1. Minimum of 10 hour break between shifts unless approved by the Operations Manager or their delegate;
2. Must not exceed 16 hour if unplanned. Prior to the 10th hour, Supervisors to notify duty managers that the shift will go beyond 10 hours;
3. Where possible, establish shift rosters ahead of time and avoid sudden changes of shifts to allow employees to plan leisure time;
4. Appropriate supervision during periods of low alertness;
5. Set standards and allow time for communication at shift changeover;

Hazardous work should be managed appropriately during periods of extreme heat; methods to do this include:

1. Consider heat and cold and requirements for protective equipment, devices or facilities for heating, cooling, shelter, rest rooms etc; and
2. Consider increasing rest breaks during periods of extreme heat.
3. Provision of potable water with drinking cups near or at the worksite.

Individual factors and factors outside of work:

1. Provide awareness, training and information on fatigue management;
2. Managing the hours of work for multiple jobs or secondary employment; and
3. Individuals are to manage external factors that may impact on their ability to carry out their work duties.

5.3. Limits to Hours of Work

Shift Duration – Continuous shifts will not normally exceed 12 hours including overtime in any 24 hour period. There will be a minimum break between shifts of ten (10) hours.

Weekly Rest – In each 4 week cycle a minimum of two (2) days break is required; these do not have to be taken consecutively.


Rest Breaks – There will be a fifteen (15) minute rest break and thirty (30) minute meal break with a break generally taken every three hours.

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Exceptions – No exceptions to any of the limits above will be made without the approval of the Operations Manager or his/her delegate.

6. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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2. PURPOSE

This guide presents a structured process for the systematic identification, assessment and management of the risks associated with tasks that place specific demands (physical or psychological) on employees. It offers processes and tools which, if adopted, help to reduce the risk of injury or harm to Elite Construcciones S. L. employees and third party contractors and the company reputation.

3. SCOPE

This applies to all employees of Elite Construcciones S.L. only.

4. RESPONSIBILITY


- 4.1 The General Manager to provide necessary support to achieve the purpose of this standard.
- 4.2 The HSE Department Head to ensure that programs are reviewed and properly implemented. Conduct audits as necessary. Provide awareness to the employees regarding the procedure.
- 4.3 Company Nurse or designated shall facilitate and assist in the medical related responses and document control. Return to work shall be reviewed by the Company nurse. Periodically monitor health condition of the crew thru health surveillance and records keeping.
- 4.4 HR and Admin Department to facilitate related activities to comply with this standard. Record safekeeping is the responsibility of the Admin department. HR and Admin dept shall identify and facilitate contract requirements for accredited diagnostic facilities. Schedule the new employees as well as old employees for medical examination.
- 4.5 Employees must be aware of this standard and comply with the procedure before working within Elite Facilities or its projects.

5. DEFINITIONS

Fitness to Work (FTW) – an employee is currently in a physical and psychological condition in which one can carry out specific work, without significant risk to oneself, co employees and the business.

Medical Surveillance – process designed to monitor the health of a workforce exposed to occupational hazard.

Cardiovascular (CVS) Profile – A Cardiovascular system risk calculator (e.g. Framingham) or equivalent may be used to give an indication of an employee’s potential for a cardiovascular event directing the need for further investigation. They do not provide an absolute and personal measure of individual risk.

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Medical Evaluation – The process by which medical information is solicited through questionnaire and or examination as part of the decision making process in respect fitness to work and medical surveillance.

Non medical evaluation – Evaluations which are not medical in nature but which is an integral part of the fitness to work decision making process. Examples include strength and agility tests, substance abuse tests and trade tests.

Trade test – The process of evaluation, in controlled circumstances, of an employee’s proficiency to complete a required task e.g. emergency response work and color vision task testing.

Unfit – This describes a decision made as a result of medical and non-medical evaluation, that an employee has a functional limitation such that they are not able to complete the designated task safely. In these circumstances the process of accommodation is applied to facilitate the retention of the employee in the workplace.

With cause evaluation – Examples of circumstances when a “with cause evaluation” may be appropriate include, but are not limited to:

- Return to work after prolonged absence due to injury or illness or commencing new medication.
- Referral by a supervisor following observed behavior in the workplace e.g. failing to complete a task appropriately.
- Self-referral by an employee with concerns over fitness for duty.

6. FITNESS TO WORK PROCESS


A Fitness for Duty Program shall provide the following components:

- Medical Surveillance
 - Pre Employment Screening
 - Periodic Medical Examination (and follow examination when appropriate)
 - Other Special Examination
 - Post Employment Examination
- Treatment
 - Emergency
 - Non-Emergency
- Record Keeping
- Program Review

6.1 COMPONENTS OF FITNESS FOR DUTY:

6.1.1 Pre-employment Screening:

There are two major functions of pre-employment screening, namely:

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- Determination of an individual’s fitness for duty, including ability to work while wearing protective equipment.
- Provision of baseline data for comparison with future medical data.

OCCUPATIONAL AND MEDICAL HISTORY

To ensure that the worker fills out an occupational and medical history questionnaire (Appendices A and B: Elite Medical History Questionnaire) paying attention to prior occupational exposures to workplace health hazards e.g. Chemical, Physical, Biological, and Ergonomics.

Review past diseases and chronic diseases particularly skin diseases like eczema, asthma, lung diseases and cardiovascular diseases.

Review of symptoms especially shortness of breath or labored breathing on exertion, other prolonged respiratory symptoms, chest pain, high blood pressure, and heat intolerance.

Identify individuals vulnerable to a particular substance (history of severe asthmatic attack to a specific chemical)

Record relevant lifestyle risk factors like cigarette smoking, drug and alcohol use.

PHYSICAL EXAMINATION

Conduct a comprehensive physical examination of all body organs focusing on the respiratory, cardiovascular and musculoskeletal systems.

Note conditions that could increase susceptibility to heat stroke such as obesity, and lack of physical exercise.

Note conditions that could affect respirator use such as missing or arthritic finger, facial scars, dentures, poor eyesight, or perforated eardrums.

ABILITY TO WORK WHILE WEARING A PROTECTIVE EQUIPMENT

Individuals who are clearly unable to perform their job based on medical history and physical examination (e.g. those with severe lung diseases, heart diseases, with back or orthopedic problems)


Limitations concerning the workers ability to use protective equipment (those who wear contact lenses cannot wear full face piece respirators)

Provide additional testing like pulmonary function test, ECG, Stress Test if warranted based on recommendations by the doctor.

Base the determination on the individual workers profile (e.g. age, medical history, physical exam, other risk factors high blood pressure, elevated blood sugar level, elevated cholesterol, smoking, etc.)

6.1.2 Baseline Data for Future Reference

Pre-employment screening can be used to establish baseline data to subsequently verify the efficacy of control measures and remedial action plan being implemented in the work area where health hazards cannot be eliminated (e.g. noise, heat, chemical hazards etc.).

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6.1.3 Pre-Employment Medical Examination

Pre employment medical examination shall be similar to the periodic medical examination. The coverage of the medical exam shall be dependent on the category of the employee (Cat 1: off shore or Cat 2: non-off shore) and the country of origin. See Appendix C and D for reference.

At the completion of the examination, the applicant shall be rated as follows:

- a. CLASS A - Physically fit for any work
- b. CLASS B - Physically under-developed or with correctible defects, (error of refraction dental caries, defective hearing, and other similar defects) but otherwise fit to work,
- c. CLASS C - Employable but owing to certain impairments or conditions, (heart disease, hypertension, anatomical defects) requires special placement or limited duty in a specified or selected assignment requiring follow-up treatment/ periodic evaluation.
- d. CLASS D - Unfit or unsafe for any type of employment (active PTB, advanced heart disease with threatened failure, malignant hypertension, and other similar illnesses).


6.1.4 Periodic Health Evaluation

Periodic annual medical examinations shall be conducted in order to follow-up previous findings, to allow early detection of occupational and non-occupational diseases, and determine the effect of exposure of employees to health hazards. These examinations:

- a. Shall be as complete and as thorough as the pre-employment examinations and include general clinical examinations.
- b. Shall include all special examinations and/or investigations deemed necessary for the diagnosis of these diseases which will be free of charge in case the workers are exposed to occupational health hazards.
- c. Shall be as frequent as the nature of employment may warrant taking into consideration the special hazards involved and their relative importance.
- d. Shall have an interval of not longer than two years between two (2) consecutive periodic physical examinations depending on hazard exposure, age of the employee, to determine if the employee continues to meet the criteria, being negatively affected by their work or if they can continue working under the same work conditions without detriment to their health and safety or to those of others.
- e. The coverage of the periodic medical examination is listed in Appendices C and D. It shall be noted that medical examination requirements may vary depending on the regulations and service availability of the host country where Elite Construcciones S. L. operates.

Following categories:

1. Cat 1: The periodic medical examination of employees for Offshore Duty (BOSIET Training Required) shall be in accordance with the UKOOA/OGUK Offshore Medical guidelines and offshore medical certificates shall be issued only from UKOOA/OGUK accredited clinics and physicians.

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2. Cat 2. The periodic medical examination of employees that does not require offshore duty (BOSIET Training is not required) shall be in accordance with the medical examination procedures approved by the government in the employees country of origin. (i.e. Filipino employees shall be issued offshore medical from DOH/POEA accredited clinics following established guidelines)

6.1.5 Other Special Examinations

Special examinations may be required where there is undue exposure to health hazards, such as lead, mercury, hydrogen sulfide, sulfur dioxide, nitro glycol and other similar substances.

5.3 Return to Work Management Plan

5.3.1 A return to work examination shall be conducted:

1. To return injured/ill employees to suitable, gainful employment as soon as medically possible.
2. To detect if illness of the worker is still contagious;
3. To determine whether the worker is fit to return to work;
4. To assist ill or injured employee who were advised by their attending physician to return to work with limitation of duties to adapt and restore to their job task gradually within an agreed time.

5.3.2 Return to Work Procedure

If an employee experienced an injury or illness which may affect their ability to undertake the full duties of their position, a medical clearance indicating “**fit to work**” from a doctor shall be required before the employee will be permitted to return to work.


5.3.3 Separation from Employment Examination

An employee leaving the employment of the company shall, if necessary, be examined by an occupational health physician / designated physician:

1. To determine if the employee is suffering from any occupational disease;
2. To determine whether he is suffering from any injury or illness;
3. Shall be complete, thorough and include general clinical examinations.
4. Shall include all special examinations and/or investigations deemed necessary for the diagnosis of diseases suspected to be occupational in nature.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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Appendix A. Elite Medical History Questionnaire - English



ELITE CONSTRUCCIONES S.L.

PUNTA EUROPA, MALABO, GUINEA ECUATORIAL

TEL. NO: (+240) 555 696 400

TEL. NO: (+44) 3300431528

EMAIL: elite@eliteconstruccion.com

Web: www.elite-equatorialguinea.com

ELITE MEDICAL HISTORY QUESTIONNAIRE

NAME: _____

DATE OF BIRTH (DAY/MONTH/YEAR): / / _____

1. Are you being treated for any medical condition at the present or have you been treated within the past year? If so, why?
 YES NO NOT SURE/MAYBE

2. When was your last medical checkup? _____

3. Has there been any change in your general health in the past year? If yes, please explain. _____
 YES NO NOT SURE/MAYBE

4. Are you taking any medications, non-prescription drugs or herbal supplements of any kind? If yes, please list. _____
 YES NO NOT SURE/MAYBE

5. Do you have any allergies? If you answered yes, please list using the categories below: _____
 YES NO NOT SURE/MAYBE

a) medications b) latex/rubber products c) other (e.g. hayfever, foods)

6. Have you ever had a peculiar or adverse reaction to any medicines or injections? If yes, please explain. _____
 YES NO NOT SURE/MAYBE

7. Do you have or have you ever had asthma? _____
 YES NO NOT SURE/MAYBE

8. Do you have or have you ever had any heart or blood pressure problems? _____
 YES NO NOT SURE/MAYBE

9. Do you have or have you ever had a replacement or repair of a heart valve, an infection of the heart (i.e. infective endocarditis), a heart condition from birth (i.e. congenital heart disease) or a heart transplant? _____
 YES NO NOT SURE/MAYBE

10. Do you have or have you ever had back problems? _____
 YES NO NOT SURE/MAYBE

11. Do you have any conditions or therapies that could affect your immune system, e.g. leukemia, AIDS, HIV infection, radiotherapy, chemotherapy? _____
 YES NO NOT SURE/MAYBE

12. Have you ever had hepatitis, jaundice or liver disease? _____
 YES NO NOT SURE/MAYBE

13. Do you have a bleeding problem or bleeding disorder? _____
 YES NO NOT SURE/MAYBE

14. Have you ever been hospitalized for any illnesses or operations? If yes, please explain. _____
 YES NO NOT SURE/MAYBE

15. Do you have or have you ever had any of the following? Please check.

<input type="checkbox"/> chest pain, angina	<input type="checkbox"/> rheumatic fever	<input type="checkbox"/> pacemaker	<input type="checkbox"/> steroid therapy	<input type="checkbox"/> seizures (epilepsy)	<input type="checkbox"/> osteoporosis
<input type="checkbox"/> heart attack	<input type="checkbox"/> mitral valve	<input type="checkbox"/> lung disease	<input type="checkbox"/> diabetes	<input type="checkbox"/> kidney disease	<input type="checkbox"/> medications
<input type="checkbox"/> stroke	<input type="checkbox"/> prolapse	<input type="checkbox"/> tuberculosis	<input type="checkbox"/> stomach ulcers	<input type="checkbox"/> thyroid disease	(e.g. Fosamax, Actonel)
<input type="checkbox"/> shortness of breath	<input type="checkbox"/> heart murmur	<input type="checkbox"/> cancer	<input type="checkbox"/> arthritis	<input type="checkbox"/> drug/alcohol dependency	

16. Are there any conditions or diseases not listed above that you have or have had? If so, what? _____
 YES NO NOT SURE/MAYBE

17. Are there any diseases or medical problems that run in your family? (e.g. diabetes, cancer or heart disease) _____
 YES NO NOT SURE/MAYBE


18. Do you smoke? _____
 YES NO NOT SURE/MAYBE

19. Is there any chance you may be pregnant? _____
 YES NO NOT SURE/MAYBE

To the best of my knowledge, the above information is correct:

SIGNATURE: _____ DATE: _____

WITNESS BY: _____ DATE: _____

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Appendix A. Elite Medical History Questionnaire - Spanish



ELITE CONSTRUCCIONES S.L.

PUNTA EUROPA, MALABO, GUINEA ECUATORIAL

TEL. NO: (+240) 555 696 400

TEL. NO: (+44) 3300431528

EMAIL: elite@eliteconstruccion.com

Web: www.elite-equatorialguinea.com

CUESTIONARIO DE HISTORIA MÉDICA

NOMBRE: _____
 FECHA DE NACIMIENTO (DIA/MES/AÑO): / / _____

1. ¿Está siendo tratado por alguna condición médica en este momento o ha sido tratado en el último año? Si es así, ¿por qué? SI NO INSEGURO/TAL VEZ

2. Cuando fue su último chequeo médico? _____

3. ¿Ha habido algún cambio en su salud general en el último año? En caso afirmativo, explíquelo por favor. SI NO INSEGURO/TAL VEZ

4. Toma algún medicamento, medicamento no pre-escritos, o suplementos herbales de algún tipo? En caso afirmativo, indique: SI NO INSEGURO/TAL VEZ

5. Tiene alguna alergia? Si respondo que sí, enumere usando las categorías a continuación: SI NO INSEGURO/TAL VEZ

a) medicamentos b) productos de látex / caucho c) otros (por ejemplo, fiebre del heno, alimentos) _____

6. ¿Alguna vez ha tenido una reacción positiva o adversa a algún medicamento o inyección? En caso afirmativo, explique por favor. SI NO INSEGURO/TAL VEZ

7. Tiene o tuvo asma alguna vez? SI NO INSEGURO/TAL VEZ

8. ¿Tiene o alguna vez ha tenido problemas cardíacos o de presión arterial? SI NO INSEGURO/TAL VEZ

9. Tiene o alguna vez ha tenido un reemplazo o reparación de una válvula cardíaca, una infección del corazón (es decir, endocarditis infecciosa), una afección cardíaca desde el nacimiento (es decir, enfermedad cardíaca congénita) o un trasplante de corazón? SI NO INSEGURO/TAL VEZ

10. ¿Tiene o ha tenido problemas de espaldas? SI NO INSEGURO/TAL VEZ

11. ¿Tiene alguna condición o terapia que pueda afectar su sistema inmunológico, p.ej. leucemia, SIDA, infección por VIH, radioterapia, quimioterapia? SI NO INSEGURO/TAL VEZ

12. ¿Alguna vez ha tenido hepatitis, ictericia o enfermedad hepática? SI NO INSEGURO/TAL VEZ

13. ¿Tiene un problema de sangrado o un trastorno hemorrágico? SI NO INSEGURO/TAL VEZ

14. ¿Alguna vez ha sido hospitalizado por alguna enfermedad u operación? En caso afirmativo, explíquelo por favor. SI NO INSEGURO/TAL VEZ

15. ¿Tiene o alguna vez ha tenido alguno de los siguientes? por favor, compruebe.

<input type="checkbox"/> Dolor de pecho, angina	<input type="checkbox"/> Fiebre reumática	<input type="checkbox"/> mareos	<input type="checkbox"/> Terapia con esteroides	<input type="checkbox"/> convulsiones (epilepsia)	<input type="checkbox"/> osteoporosis
<input type="checkbox"/> Ataque cardíaco	<input type="checkbox"/> válvula mitral	<input type="checkbox"/> enfermedad pulmonar	<input type="checkbox"/> diabetes	<input type="checkbox"/> medicamentos para enfermedad renal	
<input type="checkbox"/> Prolapso de accidente cerebrovascular	<input type="checkbox"/> tuberculosis	<input type="checkbox"/> úlceras estomacales	<input type="checkbox"/> enfermedad de la tiroides (por ejemplo, Fosamax,		
<input type="checkbox"/> Falta de dependencia de la respiración	<input type="checkbox"/> soplo cardíaco	<input type="checkbox"/> cáncer	<input type="checkbox"/> artritis	<input type="checkbox"/> Drogas/alcohol Actonel)	

16. ¿Hay alguna condición o enfermedad no mencionada anteriormente que tenga o haya tenido? Entonces qué? SI NO INSEGURO/TAL VEZ

17. ¿Hay enfermedades o problemas médicos que corren en su familia? (por ejemplo, diabetes, cáncer o enfermedad cardíaca) SI NO INSEGURO/TAL VEZ


18. Fumar? SI NO INSEGURO/TAL VEZ

19. Existe alguna posibilidad de que este Emboscado? SI NO INSEGURO/TAL VEZ

Yo declaro que la información arriba mencionada es correcta:

FIRMA: _____ FECHA: _____

ATESTIGUADO POR: _____ FECHA: _____


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Appendix C. Recommended Medical Examination Coverage (Cat 2) Expat

Medical examinations shall be from government accredited diagnostic hospital or facilities only. The following are the recommended coverage of the medical check up.

- Vital Signs (Blood Pressure, Heart and Pulse Rate, Respiratory Rate, Temperature, Height, Weight and Basal Metabolic Index (BMI))
- Taking of Past and Present Medical History
- Visual Acuity (Far and Near Vision), Color Vision, Peripheral Vision for Drivers
- Dental Examination
- Laboratory Test:
 - Complete Blood Count (Blood Typing, Rh test)
 - Blood Chemistry (FBS, BUN, Creatinine, Total Cholesterol, Lipid Profile, Blood Uric Acid, SGOT, SGPT,
 - Urinalysis
 - Fecalalysis
 - Chest X-Ray
 - ECG for applicants 35 years old and above or Stress Test at the discretion of examining physician
 - Audiometry for mechanics and offshore employees
 - Spirometry (Pulmonary Function Test) for respirator users
 - HIV/AIDS Test
 - Drug Test
- Other test requested by the examining physician, and Occupational Health Officer.

Note: Cat 1 employees shall follow UKOOA/OGUK Offshore Medical guidelines and this list may vary.

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Appendix D. Recommended Medical Examination Coverage (Cat 2) National


Medical examinations shall be from government accredited diagnostic hospital or facilities only. The following are the recommended coverage of the medical check up.

1. Basic Medical for Nationals
 - Analitica
 - Gota Gruesa
 - Hemograma Completa Automatizado
 - Antigenos Febriles
 - VIH
 - Test De Hepatitis B
 - Test De Clamidas
 - Test De Hepatitis C
 - Test De Orina Completo
 - Glucosa
 - Test De Tuberculosis
 - Test De Lues
 - Radiografia De Torax

2. Complete Medical for Nationals
 - Analitica
 - Gota Gruesa
 - Hemograma Completa Automatizado
 - Antigenos Febriles
 - VIH
 - Test De Hepatitis B
 - Test De Clamidas
 - Test De Hepatitis C
 - Test De Orina Completo
 - Glucosa
 - Test De Tuberculosis
 - Test De Lues
 - Colesterol Total
 - Colesterol Hdl
 - Colesterol Ldl
 - Creatinina
 - Heces Fecales
 - Radiografia De Torax

Note:

***Additional medical test for women personnel is Pregnancy Test

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2. PURPOSE

The purpose of this program is to promote workplace safety through positive recognition of observed safe behaviors, or note-worthy contribution or participation of employees in various health, environment and safety (HES) programs and activities. Our goal is to promote positive open discussion about safety at all levels of management, leading to safer workplace behaviors, reduction in workplace injuries, and laying the foundation to build a better safety culture at Elite Construcciones S. L. resulting in fewer workplace accidents and injuries.

3. SCOPE

This applies to all employees of Elite Construcciones S.L. only.

4. RESPONSIBILITY

- 4.1 The General Manager to provide necessary support including funds and supplementary resources to achieve the purpose of this standard. Approves the nominated safe worker.
- 4.2 The HSE Department Head to ensure that programs are reviewed and properly implemented. Conduct audits as necessary. Provide guidance and awareness to the employees and supervisors regarding the procedure. The department shall submit to the Project Manager or General Manager the recommended safety awardee for approval. Requests materials, gifts, tokens or awards to be given to selected employees.
- 4.3 The supervisors will nominate safe worker from the employees he has worked with on a monthly basis which shall be consolidated.
- 4.4 HR and Accounting Department to support the safety incentive program. The SIP shall be supplementary to any employee recognition programs by the HR department, in fact, it can be used as a factor in selecting employees for promotion. Provide adequate funds for the implementation of the program.
- 4.5 Employees must be aware of this standard and participate to the safety incentive program.


5. DEFINITIONS

SIP – Safety Incentive Program refers to this particular program promoting positive safety culture in the company thru gifts, awards or bonuses for note-worthy safe behaviors or actions of its employees.

Safe Worker Award – an award given to a particular employee who has demonstrated note-worthy safe behaviors or actions and recognized by the supervisor, safety personnel or client or management representatives.

6. INCENTIVES AND AWARDS

6.1 Monthly Safe Worker Award

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Eligibility and Criteria:

- a. More than 6 months employed with Elite Construcciones S. L.
- b. Nominated by a supervisor using the safe worker award nomination form (Appendix 1). Following criteria and considerations for nomination:
 - b.1. Has reported an unsafe condition timely which (in the opinion of the supervisor) otherwise would have resulted in a catastrophic or major incident.
 - b.2. Performed consistently and notably his job cautiously and safely. Complies with safety requirements and mitigations with minimal supervision or instructions.
 - b.3. Consistently wearing the approved PPE. Cleans his/her PPE regularly and maintains good hygiene despite the conditions of the job.
 - b.4. Follows safety instructions from supervisors and HES department personnel.
 - b.5. Attends and participates the daily safety toolbox talks (pre-job safety meeting and daily toolbox talks). Willingly reads toolbox talk topic.
 - b.6. Recognized by client for notable safe behavior or actions contributing to the good reputation of the company and the employees to its clients.
 - b.7. Recognized by management team or representatives during a site visit or inspection.
- c. HES department employees and supervisory level up are disqualified to this award.

Procedure:


- a. Supervisor / HES Department personnel may nominate a worker for the Safe Worker of the Month. Note that only notable safe workers shall be nominated. Submission of nomination is not mandatory.
- b. Submission of nomination to HES department cut off is on the 25th of the month.
- c. HES Department shall observe the nominated worker at the field or get feedback from the field safety officers or supervisors. Score and rank the nominees and submitted to the project manager / general manager for approval.
- d. HR / Admin Department shall provide the gift check or approved incentive.
- e. Awards shall be given no later than 5th of the following month.

Incentives or awards:

- a. The safe worker of the month will be given a certificate (see appendix 2).
- b. Goods, PPE, items or gift check amounting to XAF25,000. Items may change depending on availability or approved items.

6.2 Other safety incentives

- a. Client SIP. Elite Construcciones S.L. supports client or facility SIPs and encourages its workers to participate in similar programs of the client. (i.e. Stop card submissions – best stop card, zero incident incentives)

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- b. Million-man hour incentives. The management may spearhead activities in order to recognize the efforts of the workers contributing to the achievement of million safe manhour milestones.
- c. Other recognitions that maybe initiated by the management highlighting and acknowledging note-worthy safe actions or safe behavior. Sample are small tokens of appreciation for safe behavior and efforts supporting safety initiatives to be given to recognized workers during toolbox talks.
- d. Approved annual budget for the SIP shall be allocated by the accounting department which can be used by the HES Department to purchase items, goods or PPE which can be given to employees as awards or token for working safely.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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Appendix 1. Safe Worker Award Nomination Form



ELITE CONSTRUCCIONES S.L.

PARAISO, MALABO, GUINEA ECUATORIAL
 TEL. NO.: (240) 222 259622
 EMAIL: elite_construccion@hotmail.com

SAFE WORKER OF THE MONTH NOMINATION FORM

Date: _____

Sir,


I recommend Mr./ Ms. _____ as a Safe Worker of the month, for this reason/s of:

Nominating Supervisor (name & signature)

Remarks:

 HES Representative (name & signature)

Noted by:

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Appendix 2. Safe Worker Certificate



This certificate of recognition known as

SAFE WORKER AWARD

is awarded to


Pascual Mba Edjang

for his active participation and valuable contribution in the daily toolbox talks conducted at the Elite Construcciones S. L. yard.






Mr. Anthony Lionel Meakin
 General Manager
 Elite Construcciones S.L.

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2. PURPOSE

The purpose of this program is establish procedure and measures to protect short service employees from the hazards associated with their work within the operational control of Elite Construcciones S. L.

3. SCOPE

This applies to short service employees as defined below.

4. RESPONSIBILITY

4.1 Project Manager

- 4.1.1 Shall designate supervisor who will implement training program to the short service employee
- 4.1.2 Shall be responsible and accountable for the implementation and enforcement of the guidelines embodied on this program.
- 4.1.3 Shall provide necessary requirements for the effective handling of short service employee
- 4.1.4 Shall decide if an employee is considered an SSE and approves the completion of SSE program of an employee.

4.2 Supervisor

- 4.2.1 Shall be the SSE Mentor or assign an experienced employee as SSE Mentor at the site under his supervision.
- 4.2.2 Shall monitor the performance of short service employee and provide necessary adjustment
- 4.2.3 Shall recommend to the Project Manager any actions pertaining to the needs of the short service employee including recommendation of completion of an employee's SSE program.

4.3 Safety Department

- 4.3.1 Shall monitor that the provisions of this program is being complied and adhered at all times
- 4.3.2 Shall assist the Supervisor in identifying and assigning SSE Mentor


4.4 SSE Mentor (employee)

- 4.4.1 Shall coach and directly oversee the SSE at the site
- 4.4.2 Shall report to supervisor any feedback and support needed for the SSE
- 4.4.3 Orient the SSE on proper hazard identification.

4.5 SSE (employee)

- 4.5.1 Shall follow instructions and tasks given by the Supervisor or SSE Mentor
- 4.5.2 Shall make necessary adjustment to improve his skills

5. DEFINITIONS

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5.1 Short Service Employee (SSE) – Elite employee or its subcontractor with less than three (3) months experience in the same job type: a newly hired employees with different line of work from other companies or an active employee who is transferred to another line of work or discipline. Project Manager shall evaluate and decide if an employee is considered an SSE. SSE wears a yellow hard hat with a name tag “SSE”

5.2 SSE Mentor – An experienced Elite employee assigned by the supervisor to the SSE to coach and train the SSE.

6. GUIDELINES

6.1 Project Manager decides if an employee is an SSE following on the guidelines set herein and assessment of the employee’s qualification and experience and assigns a supervisor and/or an SSE mentor.

6.2 SSE personnel shall be visibly identified with a distinctive “SSE” mark on his yellow hard hat.

6.3 An SSE will not be allowed to work alone.

6.4 No more than one (1) SSE will be allowed on a workgroup of less than five (5) personnel and not to exceed 20% of more than 5 workers in a workgroup.

6.5 Subcontractor shall advise the Elite contact personnel of any SSE in their workgroup to be assigned to work with Elite and should align with this program unless expressly agreed upon otherwise.

6.6 An employee will not be considered SSE

6.6.1 if he/ she had already served three (3) months continuous or cumulative service from previous employment with Elite or its subsidiaries or direct contractors provided he/ she was hired/ re-hired in the same type of work.


6.6.2 has served three (3) months or more continuous or cumulative service that were evaluated/ promoted to a higher position in the same type of work

6.6.3 upon evaluation of the competence of an employee by the project manager who approves that an employee is considered not SSE

6.7 SSE identifier (“SSE” label on the hard hat) will be removed only upon the recommendation of the Supervisor and the Safety Department and upon approval of the Project Manager.

7. REVIEW AND EVALUATION

This HSE policy or program shall be reviewed and evaluated by the HES Department and Management every three (3) years or as needed to comply with industry regulations and best practices and updates or as a recommendation from an investigation of an incident or client.

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Appendix 1. SSE Hardhat



