

OCCUPATIONAL HEALTH, SAFETY & ENVIRONMENT MANAGEMENT SYSTEM

HSE MANUAL

Applicable Standards - ISO 45001:2018 and ISO 14001:2015

Prepared by	Reviewed by	Approved by	Rev. Number	Issue Date
Prashant Arora Biswajit Biswas (HSE)	Jagat Pandya (HSE)	Vinayak Deshpande (Management Appointee)	02	5 JAN 2021

Revision History

Description	Last Rev No.	Current revision No.	Amendments made
SW-HSEM-Rev00 (HSE Manual developed to address the requirements of ISO45001 and ISO14001)	NA	00	New Document
SW-HSEM-REV01, 05.06.2021	00	01	Revised corporate HSE Policy added
SW-HSEM-REV02, 05.06.2023	01	02	Revised corporate HSE Policy added The corporate HSE Role deleted

SECTION 1 TABLE OF CONTENT

CONTENT	Page No.	CLAUSE REFERENCE	
		ISO45001: 2018	ISO14001: 2015
SECTION 1 TABLE OF CONTENT	3	--	--
SECTION 2 INTRODUCTION	5	--	--
2.1 MANUAL DISTRIBUTION AND USER MANUAL	5	--	--
SECTION 3 DEFINITION & ABBREVIATIONS	6	--	--
SECTION 4 CONTEXT OF THE ORGANIZATION	9	4	4
4.1 ORGANIZATION PROFILE	9	4.1	4.1
4.2 CONTEXT TO DETERMINE NEEDS & EXPECTATIONS OF WORKERS AND INTERESTED PARTIES	9	4.1, 4.2	4.1, 4.2
4.3 SCOPE & PURPOSE	13	4.3	4.2
4.4 HSE MANAGEMENT SYSTEMS	13	4.4	4.4
SECTION 5 LEADERSHIP	17	5	5
5.1 LEADERSHIP & MANAGEMENT COMMITMENT	17	5.1	5.1
5.2 HSE POLICY	20	5.2	5.2
5.3 ORGANIZATIONAL ROLES, RESPONSIBILITIES AND AUTHORITIES	22	5.3	5.3
5.4 CONSULTATION & PARTICIPATION OF WORKERS	23	5.4	---
SECTION 6 PLANNING	23	6	6
6.1 ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES	23	6.1	6.1
6.1.1 HAZARD IDENTIFICATION AND RISK ASSESSMENT, ENVIRONMENTAL ASPECT IMPACT ANALYSIS & CONTROLS, ASSESSMENT OF HSE OPPORTUNITIES AND OTHER OPPORTUNITIES	24	6.1.1, 6.1.2	6.1.1, 6.1.2
6.1.2 LEGAL REQUIREMENTS & OTHER REQUIREMENTS AND EVALUATION OF COMPLIANCE	26	6.1.3, 9.1.2	6.1.3, 9.1.2
6.1.3 PLANNING ACTION	27	6.1.4	6.1.4
6.2 HSE OBJECTIVES AND PLANS TO ACHIEVE	27	6.2, 6.2.1, 6.2.2	6.2, 6.2.1, 6.2.2
SECTION 7 SUPPORT	28	7	7
7.1 RESOURCES, COMPETENCE, AWARENESS, INTERNAL AND EXTERNAL COMMUNICATION	28	7.1, 7.2, 7.3, 7.4	7.1, 7.2, 7.3, 7.4
7.2 DOCUMENTED INFORMATION	32	7.5	7.5
SECTION 8 OPERATIONS	33	8	8
8.1 OPERATIONAL PLANNING AND CONTROL	33	8.1, 8.1.1, 8.1.2	8.1
8.1.1 MANAGEMENT OF CHANGE	33	8.1.3	---

8.1.2 PROCUREMENT	34	8.1.4	---
8.2 EMERGENCY PREPAREDNESS AND RESPONSE	34	8.2	8.2
SECTION 9 PERFORMANCE EVALUATION	35	9	9
9.1 MONITORING, MEASUREMENT, ANALYSIS AND PERFORMANCE EVALUATION	35	9.1,9.1.1	9.1,9.1.1
9.2 INTERNAL AUDIT	36	9.2	9.2
9.3 MANAGEMENT REVIEW	36	9.3	9.3
SECTION 10 IMPROVEMENT	37	10	10
10.1 INCIDENT, NONCONFORMITY AND CORRECTIVE ACTION	38	10.1, 10.2	10.1, 10.2
10.2 CONTINUAL IMPROVEMENT	38	10.3	10.3

SECTION 2 INTRODUCTION

SW has developed and implemented integrated systems which include Occupational Health & Safety and Environmental management systems (HSEMS). This is as per the requirements of ISO 45001:2018 and ISO 14001:2015 applicable to our organization to document and improve our operational practices in order to satisfy the needs and expectations of our workers, customers, stakeholders and interested parties, familiarize with the controls that have been implemented and to assure them that the integrity of our management system is maintained and is focused on meeting its intended outcomes. This also describes the structure and interactions of our management system and delineates authorities, inter-relationships and responsibilities of personnel who operate within the boundaries of SW’s management systems, whilst providing reference to the procedures, forms, reports, processes, and activities that comprise it.

2.1 MANUAL DISTRIBUTION AND USER MANUAL:

This manual is prepared and reviewed by the HSE team, approved by Management Appointee (MA), and circulated to Top Management, Functional Heads, and Project In-charges.

The revision of the manual shall be done on identifying any changes in organization, methods, procedures, or regulatory standards in discussion with MA and Business HSE. The changes will be apprised CEO/ COO during the management review meeting. This document is the master copy and is maintained on the internal SharePoint site. Any copies are considered uncontrolled.

SECTION 3 DEFINITION & ABBREVIATIONS

Audit	Systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.
Client	An organisation or company that receives products and services from Sterling and Wilson.
Continual Improvement	Recurring activity to enhance performance
Environment	Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelationships.
Environmental Aspect	Element of an organization's activities, products or services that can interact with the environment.

Environmental condition	State or characteristic of the environment as determined at a certain point in time
Environmental Impact	Change to the environment, whether adverse or beneficial, wholly, or partially resulting from an organization's activities, products, or services.
Environmental management system	Part of the management system derived from ISO14001:2015 used to manage environmental aspects, fulfil compliance obligations, and address risks and opportunities
Environmental performance	Performance related to the management of environmental aspects
Hazard	A source with the potential to cause injury and ill health
HSE MS	structure, responsibilities, practices, procedures, system processes and resources for implementing occupational Health, Safety & Environmental (HSE) Management Systems. i.e., an Integrated Management system
HSE Policy	A statement, endorsed by the company's senior management, stating the intentions and principles of actions regarding the health, safety & environmental Management Systems, which gives rise to strategic and detailed objectives.
Indicator	Measurable representation of the condition or the status of operations, management, or conditions
Injury and ill health	Adverse effect on the physical, mental, or cognitive condition of a person
Interested Party/ Stakeholders	A person or organization that can affect, be affected by or perceive itself to be affected by a decision or activity.
Lifecycle	Consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.
Management System	Set of interrelated elements of an organization to establish policies and objectives and processes to achieve those objectives
Measurement	The process to determine a value
Monitoring	Determining the status of a system, a process, or an activity
OH & S performance	Performance related to the effectiveness of the injury and ill health to workers and the provision of the safe and healthy workplaces

OH&S Management system	Management system or part of management system derived from ISO 45001:2018 used to achieve the HSE policy
OH&S opportunity	Circumstances or set of circumstances that can lead to improvement of OH&S performance
Organization	Company, corporation, firm, enterprise, authority or institution or part of a combination thereof, whether incorporated or not, public, or private, that has its functions and administration
Outsource	Make an arrangement where an external organization performs part of an organization's function or process
Performance	Measurable results
Risk and opportunity	Potential adverse effects and potential beneficial effects
Risk Assessment	The overall process of estimating the magnitude of risk and deciding whether or not the risk is tolerable.
Safety	Safety encompasses the systems, programs, procedures, and practices required for the prevention of incidents. It is a state of wellness related to all the operatives related to the company.
Top Management	Person or group of people who directs and controls the organization at the highest level
Waste Management	Waste Management encompasses the assessment and disposal of waste generated by facilities with the goal of minimizing and preventing the generation of waste.
Work Environment	Set of conditions under which work is performed
Worker	A person performing work or work-related activities that are under the control of the organization
Workplace	Any physical location in which work-related activities are performed under the control of the organization

ABBREVIATIONS

ABBREVIATION	DESCRIPTION
ALARP	As low as reasonably practicable
CEO	Chief Executive Officer
Doc. No.	Document Number
Eff. Date	Effective Date
EPC	Engineering, Procurement & Construction
HSE	Health, Safety and Environment
MA	Management Appointee
SW	Sterling and Wilson Pvt. Ltd.
MRM	Management Review Meeting
NCR	Non-Conformity Report
Nos.	Numbers
OHS	Occupational Health and Safety
PE	Project Engineer
PM	Project Manager
PPE	Personal Protective Equipment
Ref.	Reference
Resp.	Responsibility
Rev.	Revision

SECTION 4 CONTEXT OF THE ORGANIZATION

4.1 ORGANIZATION PROFILE

The Company started as Wilson Electrical Business Services in 1927. It was re-christened as Sterling & Wilson in 1973 with Shapoorji Group taking a 51% stake in the Company. In 2005, the Company became an MEP solutions provider both in the domestic and international markets. Today, Sterling & Wilson is one of the few players in India offering 360° MEP solutions comprising Electrical, HVAC, Plumbing, Fire Fighting, and Low Voltage systems termed as Electro-Mechanical services or Turnkey MEP solutions. Over the years S&W has been responsible for growing the concept of Turnkey MEP projects in India, keeping in line with the global trends. This has good long-term implications for projects in the country to be executed in faster timelines and with much better quality. The recently executed MEP projects in the country including Cochin International Airport, Supreme Court of India, Ford Motors, Cadbury factory, etc are good examples of this growing trend.

The Company enjoys a significant share of the domestic MEP market. This division of the Company plays a pivotal role in the project execution of other service divisions and, therefore, lies at the heart of the organisation's operations. The MEP division's activities span the entire value chain: proposal engineering, design, project management and planning, procurement, quality assurance and on-time delivery of a superior-quality project.

4.2 CONTEXT TO DETERMINE NEEDS AND EXPECTATIONS OF WORKERS AND OTHER INTERESTED PARTIES

Context of the organization

One of the Global leaders in MEP, IEPC and O&M business, Sterling & Wilson emphasises that the context of its operation plays the most important role while developing its HSE management system & policies. Context includes the internal and external issues including environmental conditions that are relevant to SW and can affect the ability to achieve the intended outcomes.

Understanding the organization and its context to determine the needs and expectations of workers and other interested parties

A sustainable growth-oriented business model requires understanding the numerous issues which may affect its business objectives on HSE outcome. To maintain the globally acknowledged reputation and for its indefatigable urge to stay ahead as a leader, Sterling & Wilson sets the strategic direction for HSE by adopting occupational Health Safety, environmental and social principles through analysing the key aspects to support a broader sustainability initiative.

Identification of key HSE issues is a critical activity considering the multiple locations (often remote) across boundaries, we execute projects for various customers/clients amongst diversified ethical, cultural, and climatic conditions. The often-changing circumstances also played a huge role while identifying the stakeholders with substantial influence, both positive and adverse on S&W's HSE journey for achieving the intended outcome and striving for continual improvement.

Determining Our Strategic Direction

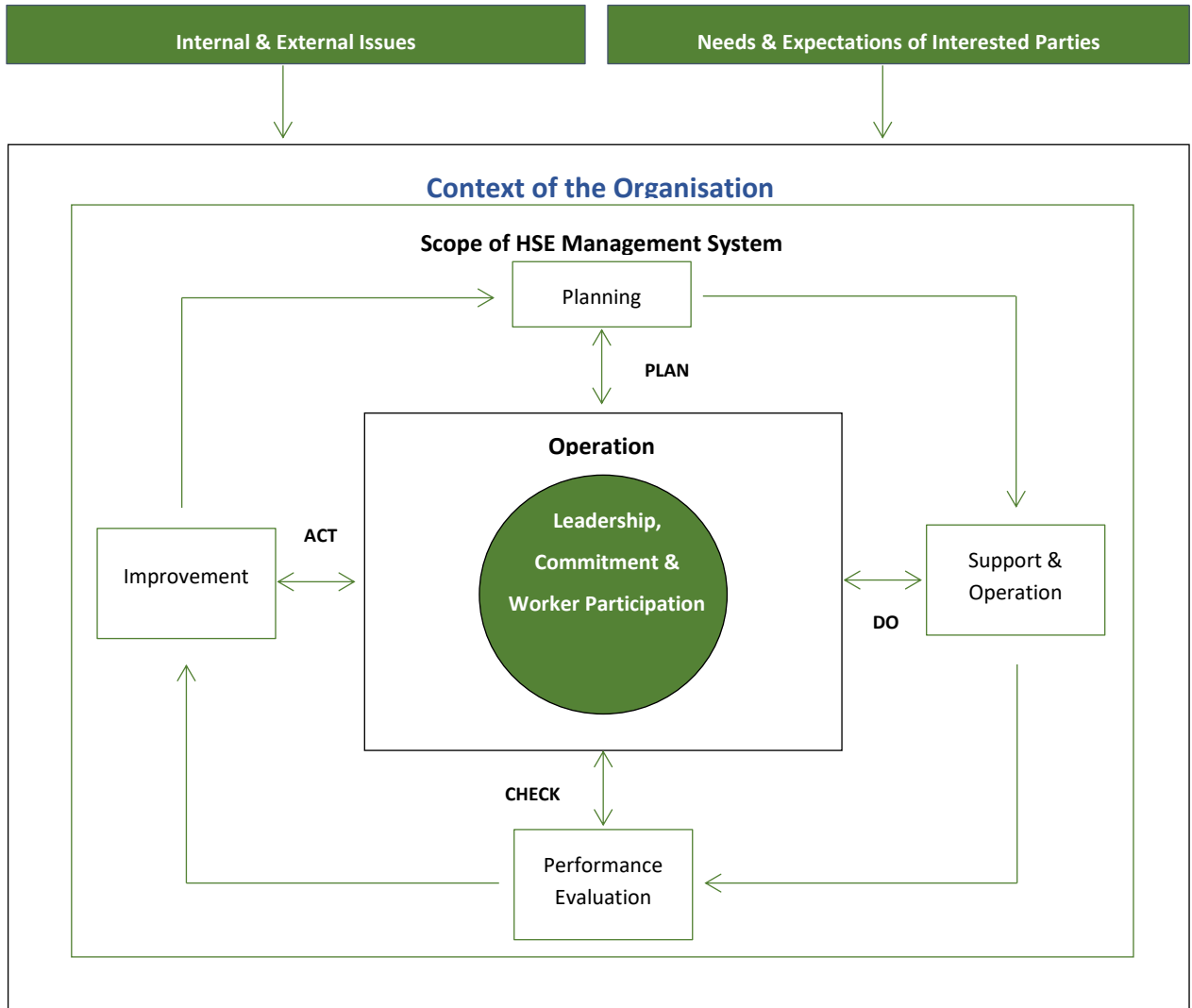
Sterling and Wilson have reviewed/analysed key aspects of its own and its stakeholders for a conceptual understanding of business impact, and subsequently to determine the strategic direction to achieve the intended outcome on HSE performance in line with its sustainable business model.

This involves:

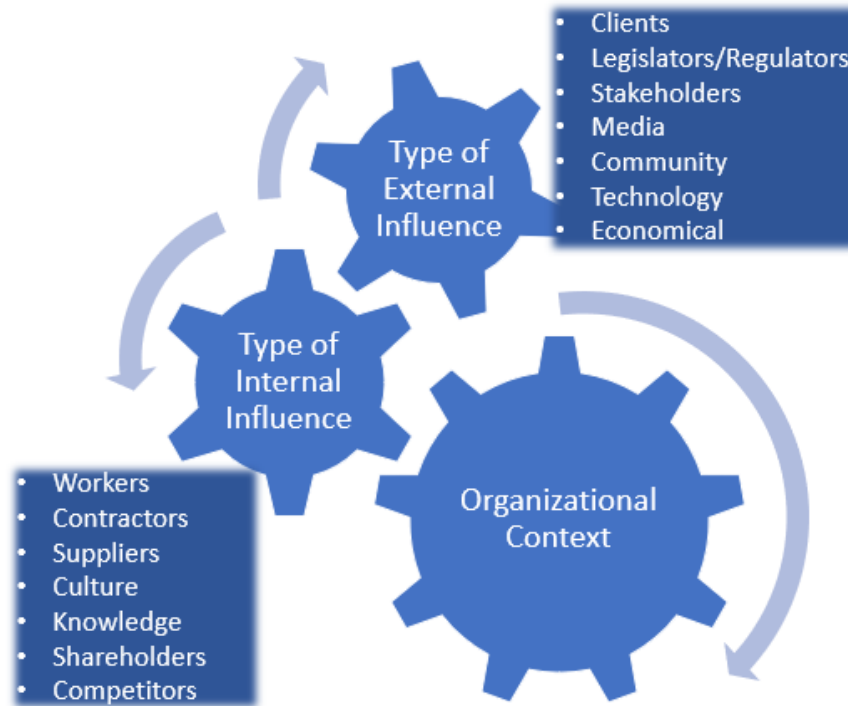
- Understanding the internal issues such as organisational policies, objectives, capabilities, information flow, decision matrix, future business focus, statutory requirements, etc.
- Understanding the external issues such as contractors, suppliers, partners, prospective clients, market competition, and industry trends on HSE; baseline environmental conditions; Published reports, policies, and guidelines by the statutory bodies and so on.
- Identifying “interested parties” (stakeholders) who may have significant interest in our HSE performance or who may be impacted by them.
- Determine the significantly interested parties who may have a high influence over our business or receive ‘high impact’ due to HSE issues from the operations.
- Connote the HSE needs and expectations of the significant interested parties including workers to understand the significant issues, that would become critical for S&Ws’ operation and which of these are its compliance obligation.

The process of understanding its context enriched the knowledge of the organisation, which in turn used to plan, implement, and operate its HSE management system. This general, conceptual understanding of the most important issues is documented in SW/HSE/F457. Such issues are monitored and updated as appropriate and discussed as part of management reviews

Sterling and Wilson utilize these well-thought-out issues as inputs while determining the scope of its HSEMS and planning for the development of the HSE process. This knowledge is used to determine the risk and opportunities, identify the probable compliance obligation, and set the HSE objectives as well.



INTERNAL AND EXTERNAL INFLUENCES:



STERLING AND WILSON’S INTERESTED PARTIES:



4.3 SCOPE & PURPOSE:

Based on an analysis of the aforesaid strategic issues of concern, and interests of stakeholders, and in consideration of its products and services, Sterling and Wilson have determined the scope of the management system as follows:

Design, Engineering, Procurement, Construction, Installation, Project Management, Testing, Commissioning, Operation and Maintenance of HVAC, Electrical Equipment, Plumbing & Piping, Fire Fighting system and Integrated building management system.

4.4 HSE MANAGEMENT SYSTEM:

SW has established, documented, implemented, and maintained its HSE management system, with a focus on continual improvement and its effectiveness in conformance with the requirements of International standards ISO 45001:2018 & ISO 14001:2015.

This document specifically addresses the following aspects:

- Determining the processes needed for the HSEMS and their application throughout the organization
- The sequence and interaction of the processes
- Criteria and methods used for the effectiveness of the processes
- Monitoring, measuring where applicable and analysing these processes
- Responsibility to implement the processes
- Procedure describing how to be achieving the intended outcome for continual improvement of HSEMS
- The type and extent of control on process related to the concerned persons under the influence or control of Sterling and Wilson
- Risk and opportunities as related to HSEMS

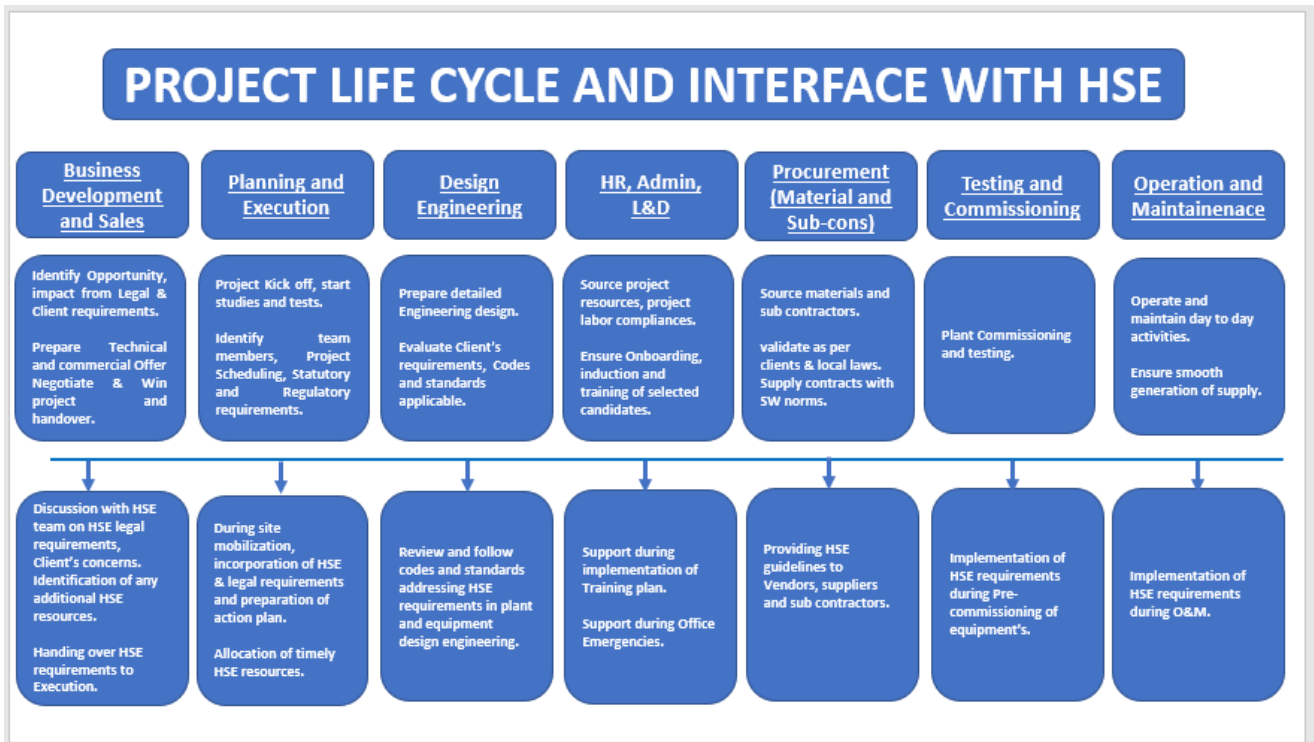
Approach for HSE MS

The HSE management system is viewed as an organized framework that is being monitored continually and reviewed periodically to define the organisation's response to the external and internal issues affecting the HSE performance of Sterling and Wilson and the overall business performance as well.

The HSE MS is developed considering the following salient criteria:

- Sterling and Wilson HSE procedures and processes are established to carry out its activity as planned to achieve the intended outcomes. These controlled processes and procedures are implemented uniformly across the organisation.

- Responsibility to implement the HSE MS at different functional levels is established by integrating requirements of the HSE management system into its various business processes.



This HSE management system is being established based on the Plan-Do-Check-Act (PDCA) model and the ongoing process of continual improvement. The framework of standards ISO 45001 and ISO 14001 are integrated and follow the PDCA model as described below:

Plan: Establishing HSE objectives and processes necessary to deliver results in accordance with the HSE policy

Standard requirements	Approach
1. Understand the organization and its context, including the needs and expectations of interested parties;	Section 4 in HSE Manual
2. Determine the scope of and implement the HSE management system	
3. Ensure leadership and commitment from top management	Section 5 in HSE Manual
4. Establish HSE policy	Section 5.2 in HSE Manual
5. Assign responsibilities and authorities for relevant roles	SW/HSE/P001
6. Identify OHSE Hazards and Risks and environmental aspects and impacts	SW/HSE/P003
7. Identify and have access to Legal obligations and other requirements	SW/HSE/P004
8. Determine the risks and opportunities that need to be addressed related to bullets 1), 6) and 7) above	SW/HSE/P002
9. Plan to take actions to address risks and opportunities determined in 8) above, and evaluate the effectiveness of these actions	
10. Establish HSE objectives and define indicators and a process to achieve them	SW/HSE/F403

Do: implement the processes as planned

Standard requirements	Approach
1. Determine the resources required to implement and maintain the HSE management system	Section 7.1 in HSE Manual
2. Determine the necessary competence of persons and ensure these persons have the competency and awareness as determined	SW/HSE/P005
3. Establish, implement, and maintain the processes needed for internal and external communications	SW/HSE/P005
4. Ensure an appropriate method for creating and updating and controlling documented information;	SW/HSE/P006
5. Plan, implement and control operational control processes needed to meet the HSEMS requirements	Site-related Standard Operating Procedures
6. Determine potential emergencies and the necessary response	SW/HSE/P009

Check: monitor and measure processes against the HSE policy, including its commitments, HSE objectives and operating criteria and report the results

Standard requirements	Approach
1. Monitor, measure, analyse and evaluate environmental performance	SW/HSE/P010
2. Evaluate fulfilment of compliance obligations	SW/HSE/P04
3. Conduct periodic internal audits	SW/HSE/P011
4. Review the organization’s HSEMS to ensure continuing suitability, adequacy, and effectiveness	SW/HSE/P012

Act: take actions to continually improve

Standard requirements	Approach
1. Take action to deal with nonconformity	SW/HSE/P013
2. Take action to continually improve the suitability, adequacy, and effectiveness of the HSE management system to enhance HSE performance	SW/HSE/P013

SECTION 5 LEADERSHIP**5.1 LEADERSHIP & MANAGEMENT COMMITMENT:**

A culture that supports an organization's HSE management system is largely determined by top management and by virtue of its group values, managerial practices, perceptions, and competencies that determine the commitment and proficiency on how its HSE issues are addressed.

The needs and expectations of its interested parties, the risks, and opportunities due to its HSE performance & practices and business objectives are the main determinants of its strategic planning.

Top management's commitment, accountability and leadership are most important for the successful implementation of an effective HSE management system, including the capability to achieve intended outcomes. It is characterized by, but not limited to, active participation of employees at all levels, cooperation and transparent communications, shared perceptions of HSE risk by active involvement and direction of the management, towards effectiveness of preventive and protective measures.

Thus, the top management demonstrates leadership by encouraging all employees to report incidents, hazards, risks, and opportunities; directing the employees to participate in training and competency building, and instructing them to ensure the HSE rules including emergency management and waste management protocol.

To keep a tab on the HSE performance across its global reach, Sterling & Wilson is capturing the real-time data of critical HSE performance through digital platforms for Risk assessment, Hazard observation, Permit to work, Incident reporting, Safety suggestion and Sustainability reporting.

To disseminate the HSE responsibilities to the organization, top management will direct and support others in the organization in relevant management roles, so they can lead HSE management in their areas of responsibility to achieve the intended outcomes for the HSE management system. Management Appointee (MA) will ensure the synergy of respective HSE responsibilities with different departments and functions.

The HSE management system will be more effective and enduring if it is intrinsic to the strategic direction of the organization and integrated into other business processes through:

- taking overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of safe and healthy workplaces and activities.
- ensuring that the HSE policy and related HSE objectives are established and are compatible with the strategic direction.
- ensuring the integration of the HSE management system requirements into business processes.
- ensuring that the resources needed for the HSE management system are available.
- communicating the importance of effective HSE management system requirements.
- ensuring that the HSE management system achieves its intended outcome.
- directing and supporting persons to contribute to the effectiveness of the HSE management system.
- ensuring and promoting continual improvement.
- supporting other relevant management roles to demonstrate their leadership as per their areas of responsibility.
- developing, leading, and promoting a culture that supports the intended outcomes of the HSE management system.
- Protect workers from reprisals when reporting incidents, hazards, risks, and opportunities.

- ensuring the process(es) for consultation and participation of workers; and
- supporting the establishment and functioning of HSE committees.

Top Management accountabilities:

Requirement	Demonstrated by	Evidenced by
Accountability for the effectiveness of the HSE	<ul style="list-style-type: none"> • Endorsed HSE Policy • Endorsed HSE Manual • Establish Objectives • Authorise HSE Management Review • Assigning adequate, competent HSE resources • Ensure Implementation of HSE • Ensuring reporting to Corporate HSE and Top Management 	<ul style="list-style-type: none"> • HSE Policy • HSE MS Manual • KPI reports • Management Review MoM, JDs, Competency records • MRM reports • Performance indicators report
Communicating the importance of effective HSE management and of conforming to the HSE requirements	<ul style="list-style-type: none"> • During Management Reviews & follow-up on Corrective Actions • Input to SW declarations at external platforms. • Poster campaign • Emphasising achievement of intended outcome through the HSE • Awareness of the Cost of HSE non-compliance and Business risks due to deviations 	<ul style="list-style-type: none"> • Management Review MoM • External platform reports • ‘Town Hall’ meetings • Posters • Interested Parties’ feedback • Awareness presentation
Directing and supporting persons to contribute to the effectiveness of HSE MS	<ul style="list-style-type: none"> • Team meetings • Site visits & toolbox talks • Feedback on performance against functional objectives • Enabling training, where required, to be undertaken • Encouraging Suggestions, and improvement projects by employees 	<ul style="list-style-type: none"> • Management Review, MoM, KPI report, • Training records, • Clear roles & responsibilities • Reports of implemented Suggestions
Promoting continual improvement;	<ul style="list-style-type: none"> • Knowledge of the PDCA model • Poster campaign – improvement practices • Supporting implementation of lessons identified • Adopting Technology for improvement of HSE performance 	<ul style="list-style-type: none"> • Able to explain Plan-Do-Check-Act cycle, HSE Policy, Poster campaign • Enabling change, Authorising competitions & prizes

<p>Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility</p>	<ul style="list-style-type: none"> • Establishing clear objectives within the team • Cascading objectives and expectations • Provision of adequate, competent resources • Regular awareness sessions with the management team • Enabling competency development (budget) 	<ul style="list-style-type: none"> • Annual strategy & budget targets, Personal performance scorecards • Competent team members, Training Presentation material, MoM • Personnel records
---	---	---

Responsibilities that can be delegated

Requirement	Demonstrated by	Evidenced by
<p>Ensuring that the HSE policy and HSE objectives are established and are compatible with the strategic direction and the context of the organization;</p>	<ul style="list-style-type: none"> • Endorsed HSE Policy • Define HSE objectives and targets • Define roles and responsibilities to achieve the policy and objectives • Define responsibilities for fulfilling compliance obligations 	<ul style="list-style-type: none"> • HSE Policy • HSE Objectives • Status of Compliance obligations
<p>Ensuring the integration of the HSE requirements into the organization’s business processes</p>	<ul style="list-style-type: none"> • Integration of HSE approvals for management of change. • HSE parameters are included in the design engineering process, Supplier evaluation process, Vendor evaluation process, transporters finalisation 	<ul style="list-style-type: none"> • Change management reports • Supplier evaluation reports
<p>Ensuring that the resources needed for the HSE are available</p>	<ul style="list-style-type: none"> • The role, responsibility, and competency for this has been mapped • Provision of adequate, competent resources • HSE requirements included in the Business plan 	<ul style="list-style-type: none"> • Competency matrix • Business plan • Budget approvals • Approved HSE objectives

<p>Ensuring that the HSE achieves its intended outcomes</p>	<ul style="list-style-type: none"> • Management Reviews, • HSE Objectives monitoring • Regular Monitoring of performance indicators 	<ul style="list-style-type: none"> • Minutes of meetings, • action plans for non-achievement • HSE objectives achievement results
--	--	--

5.2 HSE POLICY:

HSE policy is a top management commitment towards achieving the ultimate goal of outstanding HSE performance with a set of principles as the long-term direction of the organization to support and continually improve its HSE performance. It provides a framework to set its objectives and initiate actions to achieve the intended HSE outcomes. Further, these commitments are reflected in the organizational processes to ensure a robust, credible, and reliable HSE management system.

The HSE Policy defined and developed in line with the above requirements is approved by The Chairman and is a part of this manual. The contents of the HSE Policy are disseminated throughout the organisation and copies are made available (including different vernaculars) to all employees, interested parties and other stakeholders. To ensure that the policy and objectives for the HSE are understood and maintained at all levels within SW, the following measures will be followed:

- All existing and new employees will undergo induction into the HSE Policy statement and the requirements of the HSEMS.
- HSE audits will be routinely conducted to ensure compliance with HSE MS requirements.
- The HSE policy is displayed in SW offices/ project sites and a copy of this policy will be made available to the public upon official request.
- HSE Policy is available on Sterling and Wilson’s website page. https://sterlingandwilson.com/pdf/hse_policy.pdf



HEALTH, SAFETY & ENVIRONMENT (HSE) POLICY

We, at Sterling and Wilson, recognize that high standards of health, safety and environmental protection are integral for the growth of the organization and its people. We are committed to providing a safe and healthy workplace for all employees, and preventing any untoward incidents, accidents, injury and/or ill-health of any employees, contractors, and other relevant stakeholders. We also aim to take adequate measures to protect the environment and prevent environmental pollution.

The company's senior management recognizes the importance of HSE to achieve and sustain excellence in our businesses; therefore, with the cooperation of all employees, we endeavour to continually improve our HSE Management System by committing to:

- Incorporating HSE considerations in the business decisions and operations of the organization
- Adopting preventive measures in our business processes and practices
- Promoting awareness among employees, contractors, business partners and other stakeholders to develop a positive HSE culture within the organization.
- Striving to achieve zero harm and zero lost time injuries by establishing accountability along with an HSE mindset at all levels of the organization.
- Providing information and imparting training (including emergency and crisis management) to employees, contractors, and other relevant stakeholders to ensure HSE requirements are met at job sites.
- Striving to reduce our environmental impact through optimization of waste generation, preservation of natural resources and encouraging conservation and recycling.
- Maintaining proper equipment, and office and job site conditions through optimum utilization of resources that minimize and/or eliminate occupational health, safety and environmental risks.
- Developing effective planning and monitoring systems to periodically review the organization's health and safety performance and identify potential errors, and to ensure that corrective actions are initiated to reduce their impact.

Communication, consultation, participation and collaboration among all employees and stakeholders will uphold the principles of this policy. Responsibility for compliance to this policy rests with all the employees of the company. They shall support its implementation by using the safety equipment issued to them, familiarising themselves with the safety rules/procedures of the organization and enforcing appropriate corrective measures if violations are reported at job sites.

This HSE Policy will be implemented in accordance with applicable statutory requirements, safety and health regulations, and standards/ codes of practice of our customers. It shall be reviewed every two years. It will be displayed prominently on the office premises, and access to the detailed HSE manual will also be available for reference by any employee.

1st June, 2023

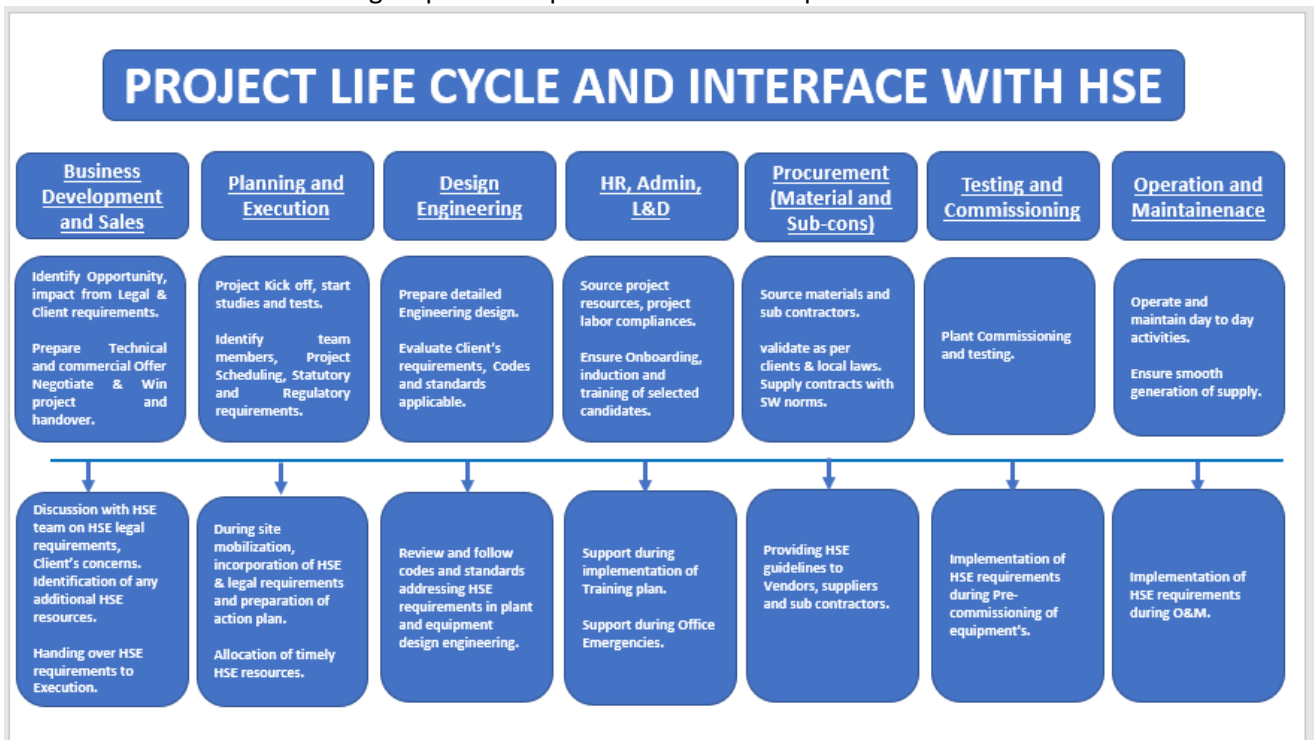


Khurshed Daruvala
Chairman

5.3 ORGANIZATIONAL ROLES, RESPONSIBILITIES AND AUTHORITIES:

The success of HSE management systems and the commitment to continual improvement of HSE performance depends on the employees’ participation in their respective business functions. To achieve it Sterling and Wilson have set the HSE roles and responsibilities at different levels of employees across functions. The HSE authorities and responsibilities are well defined for the relevant roles in the procedure **SW/HSE/P001 – Organisations Roles, Responsibilities and Authorities**

The interface matrix for multiple job functions will provide the basis for departmental interdependency of HSE performance. The Management Appointee (MA) for HSE MS, appointed by the top management, will coordinate the interface among respective departments for HSE implementation.



The responsibility and the authority to be defined for:

- ensuring that the HSE management system conforms to the requirements of this document.
- reporting on the performance of the HSE management system to top management vide SW/HSE/F405.

The online HSE portal is developed as the prime tool for implementation and measuring of HSE requirements for Sterling and Wilson projects and operations. The role-based authorities for using this digital platform are defined in user feed sheets (SW/HSE/F460).

5.4 CONSULTATION & PARTICIPATION OF WORKERS (ISO45001 CLAUSE 5.4):

Consultation and participation of workers in HSE MS is one of the most important requirements to achieve the ultimate outcome of the HSE goals of an organization. The Consultation, implies and involves the timely provision of the information necessary for workers, to give information and get feedback for achieving HSE performance.

Participation enables workers to contribute to improving HSE performance and propose any change in HSEMS if required. This is to be achieved through participation in risk assessment, safety suggestions, hazard observations, safety meetings, training, toolbox talks, and other means.

Sterling and Wilson always encourage workers at all levels to report hazardous situations, so that preventive measures can be put in place and corrective action taken. As a measure, the workers are awarded for their safety suggestions thru rewards and recognition programs.

To meet the requirements, Sterling and Wilson will follow the below:

- provide mechanisms, time, training, and resources necessary for consultation and participation.
- provide timely access to clear, understandable, and relevant information about the HSE MS.
- determine and remove obstacles or barriers to participation and minimize those that cannot be removed.
- emphasize the consultation of non-managerial workers on needs and expectations of interested parties, HSE policy, respective roles and responsibilities, authorities, legal requirements, HSE objectives, procurements and contracting, monitoring and measurements, auditing, continual improvement
- emphasize the participation of non-managerial workers in consultation and participation process, HIRA and AIA, risk and opportunities, training needs evaluation, communication, incident investigation and nonconformities, and implementation of corrective actions.

Detailed procedure is referred to in SW/HSE/P005 - Competency, Awareness, Communication, Consultation and Participation.

SECTION 6 PLANNING

6.1 ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

Planning is an ongoing process anticipating the changing circumstances to continually determine risks and opportunities of HSE MS. While planning for HSEMS, Sterling and Wilson consider context, concerns of interested parties and HSE MS scope and determines the risks and opportunities to achieve its intended outcomes through continual improvement and to prevent or reduce undesired effects. While determining the risk and opportunities, HSE hazards and associated risks, environmental aspects and associated impacts, other opportunities and legal & other requirements would be considered. Sterling and Wilson will identify and assess the risks and opportunities that are relevant to its intended HSEMS outcomes in line with the changes in the organisation, processes, or management systems.

Risk and opportunity management is undertaken as part of SW's day-to-day operations to capture and respond to perceived risk and opportunity, ensuring each issue is managed at the most appropriate level within the organization. The aim of risk and opportunity management is to ensure that organizational capabilities and resources are employed efficiently and effectively to take advantage of opportunities and to mitigate risk to our strategic direction and business planning, interested parties, management system, processes and suppliers. SW considers and manages the risks and opportunities relating to internal and external stakeholders in line with the context. This process uses the information collected during the evaluation of context and strategy, analysis of context and interested party and from the evaluation of OHS hazards & environmental aspects.

All risk and opportunity management activities and related decisions are recorded in the Risk & Opportunity Register (SW/HSE/F459). This register allows us to methodically assess each risk and to study each opportunity associated with our organizational context, strategy, Significant risk/not acceptable hazards, and compliance obligations that relate to the needs and expectations of our customers and interested parties. Controls like SOPs, Management Programs will be derived to mitigate the risks.

Detailed procedure is referred to in SW/HSE/P002 – Risk and Opportunities.

6.1.1 HAZARD IDENTIFICATION AND RISK ASSESSMENT, ENVIRONMENTAL ASPECT IMPACT ANALYSIS & CONTROLS, ASSESSMENT OF HSE OPPORTUNITIES AND OTHER OPPORTUNITIES

Sterling and Wilson firmly believe that the identification of OHS hazards and environmental aspects is an ongoing process that could influence to establishment of the HSE MS and the assessment of OHS risks and environmental impacts, would lead to achieving its intended outcome. It will continue as the design is detailed followed by the operation as well as ongoing during its full life cycle to reflect current, changing, and future activities.

Hence, Sterling and Wilson have established and implemented a system to identify OHS hazards/environmental aspects and assess the OHS risks/environmental impacts by an experienced team consisting of area in-charges, engineers, job supervisors, safety professionals and workers to determine the controls. It should be noted that the life cycle perspective (SW/HSE/F458) needs to be considered while identifying the environmental aspects. Hazard Identification Risk Assessment and Environmental Aspect Impact Assessment will be carried out on the online HSE portal system and recorded in the HIRA-AIA Module (SW/HSE/F431).

The Hazard Identification and Risk Assessment and Environmental Aspect Impact need to be addressed the following elements:

- organisational activities related to projects and operations, considering associated risk, its social and cultural impact and how it is addressed & controlled by management.
- All routine, non-routine, normal, abnormal activities, and emergencies, including but not limited to:
 - infrastructure and physical conditions of the workplace,
 - equipment, materials, and substances
 - design, service, testing, assembly, modification, maintenance, and disposal
 - human factors.
 - how the work is performed.

- Past incident and emergency data
- potential emergencies
- People including workmen (direct and indirect), contractors, staff and visitors, other workplace-related personnel, neighbouring community living in the vicinity of the workplace and off-location employees.
- Other persons and situations in the vicinity not in direct control of SW but may affect adversely
- Human capabilities and ergonomics, machinery, and equipment in use
- Plant layout
- Change in processes, activities and layout, knowledge and information, and equipment.

Sterling and Wilson is assessing its significant OHS risk and environmental impacts arising out from its projects and operations considering the effectiveness of the existing controls, and determining the control hierarchy and measures required thereof.

The evaluation of the OHS risk of an activity is carried out on the basis of the likelihood or frequency of occurrence of an event and its consequence or severity of that event. The evaluation of Environmental Impact is calculated considering its scale, severity, probability, and duration.

The OHS Risk / Environmental impact matrix is developed on the basis of our collective experience from S&W executed past projects and from similar industries /projects, to determine the significant OHS Risk / Environmental Impact.

While evaluating the significance of an OHS risk / an Environmental Impact, the effectiveness of the existing process and related control will be taken into account along with the lifecycle impact on the environment of a product being used for that activity; and the rating will be provided accordingly.

A Hierarchy of controls for significant OHS risks / Environmental impacts will be selected as practicably possible keeping in mind the ALARP principle. If elimination of a task or sub-task is possible, then will follow it, whereas in other instances substitution, engineering controls, administrative controls and use of personal protective equipment will be chosen. A combination of more than one control to mitigate the significant risk may be adopted wherever required.

Re-evaluation of the risk rating will be carried out along with the identification of new hazards in case of change in the operational set-up. The change related to operations and decision, work methodologies, plant and equipment, statutory requirements, resources and (or) skill, will be considered for this purpose.

Local external issues which may impact the activities or decision on the execution and the worker's concern are to be considered for reevaluation of risk as well. Communication of the new risk equation through training or other means to the workers and others concerned will be ensured.

The procedure of Management of Change (SW/HSE/P07) is in place to address the requirements of review and re-evaluation of risk.

While carrying out the evaluation of the environmental impact of an activity to identify the potential impact, S&W will consider not only the adverse environmental impact but the positive or beneficial impact as well.

While rating the impact to determine the significance, the team will consider both actual and potential impacts on air, water, soil, flora, fauna, and land couture. Apart from the magnitude of global environmental impact, the local environmental conditions such as local weather conditions, water table, soil types, cultural heritage, and social environmental dependencies, also will be considered. The Environmental impact of an emergency and the carbon footprint potential are also to be considered during evaluation.

The OHS risk and Environmental Impact evaluation and its rating to identify significance will be carried out in accordance with **SW/HSE/P03-HIRA AIA**.

6.1.2 LEGAL REQUIREMENTS & OTHER REQUIREMENTS AND EVALUATION OF COMPLIANCE

Sterling and Wilson identify all applicable legal requirements where it operates/executes to determine the applicability of statutory norms, and local regulations to its projects and operations. Other requirements such as contract conditions, environmental baseline study (if applicable), lender/financers requirements, local community rules & protocols, and stated needs & expectations of interested parties on HSE will also be addressed as applicable.

The decision to determine the applicable legal requirements and other requirements of projects and operations will be enlisted in Task Management Module in the online HSE portal for specific locations.

Periodic updates on legal and other requirements, or updates required due to any change including needs and expectations of interested parties, requirements arising out due to planned developments or modified activities, will be ensured.

The information on new or modified legal requirements will be captured through Sterling and Wilson's Legal and compliance team, memberships of the National Safety Council & British Safety Council and other relevant professional bodies, and related governmental websites on HSE regulations.

Sterling and Wilson are addressing the legal obligation on its HSE commitments through:

- a commitment to fulfil compliance obligations in the HSE policy
- establish HSE objectives with consideration to compliance obligations
- ensure that all persons working under the organization's control are aware of the consequences of failing to fulfil compliance obligations and have necessary competence regarding applicable compliance obligations, and related processes that apply to them.
- communication of compliance obligations to concerned
- periodically evaluate fulfilment of compliance obligations
- consider changes in compliance obligations when reviewing the HSE MS.

Periodic review of the compliances and evaluation of its status will be ensured, and actions will be taken accordingly in management review meetings. SW procedure **SW/HSE/P004** and **SW/HSE/P07** will address this requirement in detail.

6.1.3 PLANNING ACTION:

To establish and implement the HSEMS for Sterling and Wilson, we have drawn inputs and planned certain activities by identifying risks and opportunities, significant environmental aspects, legal and other requirements relevant to the business, identification of multiple emergency scenarios; to adopt the required actions for implementation and incorporation into the HSEMS.

- Action over identified HSE risk and opportunities to integrate it with HSE MS, are addressed through procedure SW/HSE/ P02.
- Verification and evaluation of Legal and other requirements are addressed through procedure SW/HSE/ P04.
- Emergency planning and preparedness are addressed through procedure SW/HSE/P09.
- Identified significant environmental aspects are addressed through procedure SW/HSE/P03

To meet our corporate HSE commitments and objectives, and for establishing HSEMS and communicating its requirements, policies, objectives and associated operational procedures, implementation of planning HSE planning activity in a true sense plays an important role.

Once the significant risks and opportunities are identified; from the activities and outputs undertaken, our organization plans actions to avoid or mitigate perceived risks, or to take advantage of opportunities. Business HSE analyses the risks associated with each change and presents the assessment to MA and in turn to Corporate HSE and Top management for consideration.

Action is taken in a variety of ways by ensuing management views and requirements on HSE, design review meetings, HSE goal settings, KPIs and policies, operational control, emergency preparedness, supplier, and contractor's evaluation (SW/HSE/P08), and other appropriate processes including management of change (SW/HSE/P07).

6.2 HSE OBJECTIVES AND PLANS TO ACHIEVE:

Setting HSE objectives to achieve the goal of continual improvement in HSE performance is one of the key elements to having a robust HSE MS. Sterling and Wilson have set HSE objectives for continual improvement of its HSE performance considering the following inputs:

- HSE Policy
- Legal and other requirements
- List of significant HSE aspects/ hazards and risk/ impact
- Views of interested parties including consultation with workers
- HSE Risks and opportunities impacting SW's business
- Operational and business requirements
- Financial and technological options

HSE Objectives are to be well defined within a specific timeframe; to be monitored, communicated, updated and with measurable outcomes as appropriate.

The HSE objectives need to be reviewed periodically, to monitor its progress towards its intended outcome, on the following parameters

- define the objectives
- resources required
- responsible person/ team
- timelines for milestones and completion
- evaluation criteria
- performance indicators for monitoring
- actions required to achieve the HSE objectives

Sterling and Wilson will maintain the HSE objectives and their progress as documented information through Format SW/HSE/F403. Objectives are reviewed every six months to monitor their progress and to take decisions for any additional resources if required. Top management will look over the status of the objectives and their progress during its management review and revise the same for any additional resource requirement and in turn provide directions for setting the new objectives.

SECTION 7 SUPPORT

7.1 RESOURCES, COMPETENCE, AWARENESS, INTERNAL AND EXTERNAL COMMUNICATION (ISO45001 AND ISO14001 7.1, 7.2, 7.3, 7.4)

RESOURCES:

Adequacy of resources is an important factor for the successful implementation of HSEMS. The required resource is organized for establishing, implementing, maintaining and continual improvement of the HSEMS, in terms of:

- infrastructure
- externally provided resources
- information systems
- human resources
- competence
- technology
- financial

Keeping the view of the futuristic need of the business S&W has allocated the required resource to embrace the digitisation of the HSE Process through an internationally recognised organisation of repute. It has given a solid milestone for tracking the HSE performance in detail and thus identifying the areas, where it requires improvement.

S&W not only standardises the basic infrastructures require for HSE process implementation at all project site, but also the responsibilities and authorities at all level right from the top management to staff/supervisors /workers concluded in roles and responsibility document, and implement it through the role matrix of online HSE portal.

Embracing new technology always remains a great priority of S&W. Our design engineering team is working hand in hand with the HSE team and other subject matter experts for adopting the new developments in the execution process or for optimisation of resource utilisation for the plant installation and maintenance.

In the same line, the objectives have been taken after discussion with the business head / COO and thus the financial resource allocation has been secured with a tentative budget. Knowledge is an important resource for establishing or improving the HSE management system. S&W has emphasised this requirement and developed a detailed training plan as per the training matrix. Toolbox talk for the execution workforce is well-defined and even it is linked with the issuance of the PTW system. S&W knowledge management portal has been developed to keep the inventory of the already acquired knowledge over a subject and to disseminate it among the employees.

COMPETENCE

The competence of the workforce across all levels including management staff is an important factor to achieve the desired outcome in HSE MS. Competence includes the knowledge, understanding, skills or abilities needed to appropriately identify the hazards / environmental aspects and deal with the OH&S risks / environmental impact associated with their work and workplace.

The HSE competencies for the different organisational roles that affect or can affect its HSE performance including compliance obligations, are addressed through different means.

The competency requirements for the office staff, management staff and coordinators, those who manage a function or undertake a role which is critical to achieving the intended outcomes of the HSE management system are addressed mainly through:

- the education, training, qualification, and experience necessary to undertake the role and the retraining necessary to maintain competence.
- the understanding of requirements applicable to the HSE management system.
- the understanding of organisational commitment in HSE policy & obligation in legal and other requirements.
- the understanding of the potential consequences of compliance and noncompliance, including the impact on the worker's health and safety and environment.

Competency requirements of the office staff, management staff and coordinators are addressed through the Job Description of that role. The frontline workforce at S&W project sites including contractor workers are required to have the necessary competence to remove themselves from situations of imminent danger and to be sensible towards work methods or materials with potential environmental degradation. For this purpose, it is important that this target group is required to have a practical skillset depending on their past experience on similar jobs/projects.

S&W identifies the required competencies of these frontline workforces for multiple trades, critical to HSE based on mainly:

- the past training and past experience.
- the understanding of the HSE requirements associated with the trades.
- the HSE policy & obligation in legal and other requirements.
- the understanding of the potential consequences of noncompliance and the impact on the health and safety and environment

- the environmental condition of the workplace and individual capabilities.
- the understanding of the preventive and control measures resulting from the risk assessment and environmental aspect identification process.

The competency matrix for multiple trades which are legally identified and significant to the HSE performance is developed, and the competency of an individual is assessed by the HSE professional in the stipulated format (SW/HSE/F201 to 222) and maintained in S&W online HSE portal. The relevant updating of the competence will undergo necessary changes by context or work changes.

To build the necessary HSE competencies across all levels, workers and other employees including management staff must be provided with sufficient training on hazards & risks / environmental aspects & impacts associated with the work. The training on SOPs and the Emergency response plan is extremely necessary across all levels of the workforce. The fundamental HSE rules of a particular establishment (project or location) are required to communicate through Induction training. A separate HSE Induction programme is imparted in the S&W worksite for the visitors. On-the-job Toolbox Talk is used as an effective tool to train the workers on the SOP of a particular activity at the location before starting an activity.

The S&W training process includes:

- identification of training needs through the ‘training matrix’ based on roles/trades of an identified group across all levels of employee.
- design and development of monthly training plan to address identified training needs
- delivery of the training through standardised training modules and delivered through selected trainers
- evaluation of the training result of the group undergone the training.
- documentation and monitoring of the training records through the online HSE portal.

S&W will evaluate the effectiveness of the training after 10 days to verify whether the necessary competence is achieved.

AWARENESS

S&W recognise that building awareness across all levels of employees, in relation to the HSE management system and HSE performance to enhance knowledge and promote behaviour that supports the organization’s HSE commitments is one of the key elements to its HSE journey. This includes making employees and others under the organization’s control, aware of S&W’s HSE values, and how they can contribute towards the organization’s business strategy.

S&W ensure that its employees across all levels and those it has control will aware about:

- the HSE policy
- Importance of HSE objectives for which they are responsible or accountable
- their contribution to the effectiveness of the HSE management system, including the benefits of improved HSE performance.
- the implications and potential consequences of not conforming to the HSE management system requirements.
- the significant actual or potential environmental aspects and associated environmental impacts of their work activities.
- hazards, OH&S risks, and actions determined that are relevant to them

- identified HSE risks and opportunities that need to be addressed in relation to their work activities,
- incidents and the outcomes of investigations that are relevant to their job

S&W do recognize that all its workforce including permanent employees, contractual employees and other staff, temporary worker, contractors, visitors and any other parties should be aware of the OH&S risks to which they are exposed in order to develop the ability to remove themselves from work situations that they consider present an imminent and serious danger to their life or health. They must also be made aware of the arrangements for protecting them from undue consequences as well. HSE Induction program, emergency preparedness training, and Hazard reporting program are developed to address this issue.

COMMUNICATION

S&W established the communication process in relation to its HSE management system for gathering, updating and disseminating information relevant to the operations. S&W addressed the relevant HSE communication requirements in the documented procedure (SW/HSE/P05) and considering the following requirements:

- the relevant legal requirements and compliance obligations.
- the consistency and reliability of the HSE information, which are to be communicated is
- the communication protocol to ensure that relevant HSE information is received and is understandable to all relevant workers and interested parties.

A communication matrix (SW/HSE/F461) is developed to address the pertinent communication requirements both to the internal & external interested parties. To be specific in necessary communication to the different stakeholders / interested parties the following points are considered in the communication matrix:

- what to communicate.
- when to communicate.
- with whom to communicate, such as internal or external, relevant interested parties, contractors, and visitors.
- how to communicate, i.e., communication medium such as – electronic medium, print medium, register, posters/signages etc.

The documented information/records of the communication both to and from the stakeholders are to be retained till the project lifecycle. The resolution of any stakeholder communication if asked for, the same would be updated in the task management module in the S&W online HSE portal. The communication matrix would address what are those HSE issues to be communicated to the internal stakeholder and the external stakeholder as well. It also addresses the probable communication S&W may receive and provide direction for its resolution.

Internal Communication would address the HSE matters, which may affect the workers under its control and other employees of the organization, including:

- the relevant information among the various levels as appropriate, about the HSE management system and functions of the organization, such as HSE policy, HSE suggestion, HSE achievement through broadcasting tool and so. Any change in the HSE management process addressed through MOC

(SW/HSE/P07) is required to be communicated to all the internal stakeholders to make them aware of the new risk if any and its mitigation action.

- the required communication on the HSE processes which enables the workers and other internal stakeholders to contribute to continual improvements, such as - hazard reporting,
- lessons learnt in incident investigation, HSE rules, Safety suggestions and so.

External Communication would address the HSE information relevant to the HSE management system, as to the identified external stakeholders that also address its communication requirements to fulfil the obligation of legal/statutory requirements and other requirements. External communication will also address the way, the neighbouring community needs to act in an outbreak of emergency or so. On the other hand, the communication on HSE issues received from the neighbouring community, local body, or other stakeholders, will be received by multiple modes and the resolution of the same to be accomplished accordingly. S&W has developed the Stakeholders management plan (SW/HSE/P014) to set the guideline for this purpose.

The procedure **SW/HSE/P005 – Competency, Awareness, Communication, Consultation and Participation** further elaborates on these requirements described above.

7.2 DOCUMENTED INFORMATION

SW has established documented and implemented HSE MS that satisfies the requirements of ISO45001:2018 and ISO 14001:2015. The scope of the HSE system covers, the organization, responsibilities and authorities, procedures, work methods, and resources, with a view to achieving and maintaining a service commensurate with the HSE policy and objectives and the client expectations. The HSE MS documentation is structured in the following order of precedence:

- HSE Management Systems Manual (HSEMS Manual) provides an overview of the HSEMS. It sets out in broad terms what the SW intends to achieve by the adoption of a Management System. It defines the responsibilities for the structure of the system. It provides details on how the system complies with the ISO 45001:2018 and ISO 14001:2015 standards requirements.
- HSE Management Procedures (P), which detail the responsibilities and methods to be followed when carrying out various processes and tasks and their related controls. These procedures define how the requirements of applicable clauses of ISO 45001:2018 and ISO 14001:2015 and are applied to the services. These are confidential and their circulation is restricted to internal use unless otherwise contractually agreed with the client.
- Standard Operating Procedures (SOP) where necessary are developed to suit individual documentation needs for specific activities for subsidiary processes or operations. These are maintained at the site level.
- HSE documented information/records are maintained in accordance with stated procedures in order to provide evidence that the requirements of the HSEMS standard as well as customer and interested party requirements are met and to demonstrate continual improvement.
- Documents of external origin, which are essential to the HSEMS such as specifications, manufacturer's manuals, reference standards, national rules, and regulations, national or international codes or standards etc.

Detailed procedure is referred to as SW/HSE/P006 – Control of Documented Information

SECTION 8 OPERATIONS

8.1 OPERATIONAL PLANNING AND CONTROL

Sterling and Wilson recognise that determining the controls for mitigating the risks of hazards and aspects is an imperative need for continual enhancement of HSE performance. The established process of operational controls will be implemented as necessary by eliminating hazards or, if not practicable, by reducing the HSE risks to levels as low as reasonably practicable for operational areas and activities.

The operational control of the processes will include the use of procedures and systems of work, ensuring the competence of workers, establishing preventive or predictive maintenance and inspection programmes, specifications for the procurement of goods and services, application of legal requirements and other requirements, or manufacturers' instructions, for equipment, engineering and administrative controls, defining, or redefining, how the work is organized, the induction of new workers, defining, or redefining, processes and working environments, and using ergonomic approaches when designing new, or modifying, workplaces & equipment.

To reduce or control the HSE risk hierarchy of controls systematic approach is adopted while establishing these controls such as elimination, substitution, engineering, administration and PPEs. The PPEs are considered a last resort of controls to mitigate the risks.

The related PPEs for relevant jobs are addressed through the PPE matrix (SW/HSE/F411).

8.1.1 MANAGEMENT OF CHANGE

Sterling and Wilson are cognizant of changes in HSE risks and the introduction of new hazards into the work environment as changes occur with respect to technology, equipment, facilities, work practices, raw, material, design specification, staffing, standards, and regulations. Based on the nature of the change, SW uses an appropriate methodology for assessing HSE risks and opportunities involved in the change. To manage this change SW has developed a process for the implementation and control of planned temporary and permanent changes that impact HSE performance. This process includes the impactful changes from

- new materials, services and processes, or changes to existing materials and services
- processes, including location, surroundings, organisation, working conditions, equipment, and workforce.
- changes to legal requirements and other requirements.
- changes in knowledge or information about hazards and HSE risks.
- developments in knowledge and technology.

SW reviews the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary. All the changes are documented in the respective formats where the change is applicable. Detailed procedure is referred to in **SW/HSE/P007**.

8.1.2 PROCUREMENT

Sterling and Wilson have recognised the need for processes to determine, assess and eliminate hazards and to reduce HSE risks associated with products, hazardous materials or substances, raw materials, equipment, equipment hiring and services before their introduction into the workplace. To achieve this, SW has established and implemented a process to control the procurement of products and services to ensure their conformity to its HSE management system.

In addition, SW coordinates with its contractors, to identify hazards and to assess and control the HSE risks arising from:

- the contractors' activities and operations that may have an impact on SW
- SW's activities and operations that impact the contractor's workers and
- the contractors' activities and operations that impact other interested parties in the workplace.

SW ensures that the requirements of the HSE management system are followed by contractors and their workers. SW's procurement procedure (**SW/HSE/P008**) details our selection criteria for contractors. This procedure is controlled and consistent with legal requirements and other requirements for achieving the intended outcomes of the HSE MS.

8.2 EMERGENCY PREPAREDNESS AND RESPONSE

Sterling and Wilson have a process to identify potential emergencies pertaining to its business operations which may lead to an undesired environmental impact or health and safety hazard. Site HSE/PM is responsible for ensuring that procedures and practices are established for preventing and responding to emergencies. The outcome of the HIRA-AIA Assessment will also be considered while preparing the EPRP for sites. The Emergency Management Plan is jointly owned by the HSE Manager, Project Manager with responsibilities assigned to a dedicated Emergency Response Team, which includes trained Fire Marshals and First Aiders, and is periodically tested by conducting regular drills.

The Emergency Management Plan is initiated in the event of an emergency arising from the following scenarios:

- Incidents involving medical emergency
- Natural disasters like Flood, fires, earthquakes, cyclones
- Environmental Spills/ Releases
- Release of chemical substances
- Collapse of structures
- Pandemic

Response to the emergency is addressed through identification of emergency, prompt response to emergency and mitigation of the risk/impact, provision of periodic reviews and periodic drills to check the effectiveness. Detailed procedure is referred to in **SW/HSE/P009**.

SECTION 9 PERFORMANCE EVALUATION

9.1 MONITORING, MEASUREMENT, ANALYSIS AND PERFORMANCE EVALUATION

In order to identify the status of HSE MS implementation to achieve the intended outcomes of the HSE performance, the laid down HSE processes and system require periodic monitoring, the critical indicators of HSE performance require measurement and the related data needs in-depth analysis.

While determining the monitoring and measurement requirements in the Monitoring and Measurement Matrix (SW/HSE/F509) following considerations are considered:

- what needs to be monitored and measured.
- the methods for monitoring, measurement, analysis, and evaluation, as applicable
- the evaluation criteria of the HSE performance, and appropriate indicators.
- when the monitoring and measuring will be performed.
- when the results from monitoring and measurement be analysed and evaluated.

The inputs for the monitoring requirements will come from environmental Impact assessment, OHS risk assessment, statutory regulations, HSE objectives, emergency management plan and incident investigation outcome. It will be ensured that only valid calibrated equipment is in use for measuring physical parameters

A systematic approach towards evaluation of the organisational HSE performance is certainly one of the most important aspects to achieving the intended outcome on HSE performance. S&W has determined the parameters, that are necessary to monitor and measure for analysing the present HSE performance vis-a-vis it intended to achieve and thus to emerge as a global benchmark on HSE performance.

While determining the monitoring requirements S&W has considered the followings:

- the extent to which legal requirements and other requirements are fulfilled.
- its activities and operations related to identified hazards, risks, and opportunities.
- tracking progress on achieving HSE policy commitments and the organization's HSE objectives and continual improvement
- effectiveness of operational and other controls.
- data on emissions and discharges to fulfil compliance and sustainability.
- data on the use of water, energy, or waste generation to achieve environmental commitments.
- data to evaluate the organization's Safety & environmental performance.
- data to evaluate the performance of the HSE management system.

S&W addresses all these above requirements in S&W online HSE portal through multiple modules such as:

- Sustainably module
- Task management module
- Incident management module
- Inspection & Audit Module
- Hazard observation module and so on.

The data representation and the detailed data analysis are the key inputs for continual improvement of HSE MS. Insight Modules in the online HSE portal addresses those requirements. HSE reports including monthly site

rating & contractor rating are developed to generate the overall performance status in concise form and to provide indications on HSE implementation to the management for action needed. Detailed procedure is referred to in **SW/HSE/P010**.

9.2 INTERNAL AUDIT

Sterling and Wilson have established a defined procedure for its effective audit management as per ISO 14001 and ISO 45001 international standards. The extent of the audit programme is based on the complexity and level of maturity of the HSE MS. Audits are scheduled based on the status and importance of the activity and results of previous audits. Audits are prepared and planned by trained auditors and the audits will be preferably held by auditors independent of the function that they are auditing.

All non-conformities raised during the audit are recorded through Audit and Inspection module through the online HSE portal and an audit report is prepared. The outcome of audits is communicated to respective managers who are responsible for the timely implementation of agreed corrective actions. It requires that the implementation and effectiveness of corrective action are to be verified through Finding and Action items recorded in the online HSE portal. The progress on the closure of action items of corresponding findings of audits will be one of the prime inputs for the HSE management review. Detailed procedure is referred to in **SW/HSE/P011**.

9.3 MANAGEMENT REVIEW

Sterling and Wilson's top management recognizes the importance of HSE to achieve and sustain excellence in its businesses; therefore, with the cooperation of all employees, it endeavours to continually improve the HSE Management System. Management review may be coordinated with the SW's planning and budgeting cycle, and HSE performance being evaluated during top management's review of its overall business performance so that decisions on priorities and resources for the HSEMS are balanced with other business priorities and resource needs.

To ensure the continuing suitability, adequacy, and effectiveness of SW's HSEMS in meeting the organization's strategies, Top management conducts formal management review meetings annually. MA will chair the management review meeting and ensures that the review includes each of the requirements of ISO 14001:2015 and ISO 45001:2018. Management Review Minutes are prepared and distributed by the MA.

The management review considers the following **inputs**:

- the status of actions from previous management reviews.
- changes in external and internal issues that are relevant to the HSE management system, including:
 - the needs and expectations of interested parties.
 - legal requirements and other requirements.
 - risks and opportunities.
- the extent to which the HSE policy and the HSE objectives have been met.
- information on the HSE performance, including trends in:
 - incidents, nonconformities, corrective actions, and continual improvement.
 - monitoring and measurement results.
 - results of an evaluation of compliance with legal requirements and other requirements.

- audit results.
- consultation and participation of workers.
- risks and opportunities.
- adequacy of resources for maintaining an effective HSE management system.
- relevant communications with interested parties.
- opportunities for continual improvement.

The **outputs** of the management review include decisions related to:

- the continuing suitability, adequacy, and effectiveness of the HSE management system in achieving its intended outcomes.
- continual improvement opportunities.
- any need for changes to the HSE management system.
- resources needed.
- actions, if needed.
- opportunities to improve integration of the HSE management system with other business processes.
- any implications for the strategic direction of the organization.

Detailed procedure is referred to in SW/HSE/P012 – Management Review.

SECTION 10 IMPROVEMENT

Sterling and Wilson believe that improvement is integral to an effective HSEMS and identifies opportunities for improvement because of monitoring, measurement, analysis, and evaluation related to HSE performance and fulfilment of its compliance obligations; audits of its HSEMS and management review. To achieve the intended outcomes of the HSEMS, SW takes actions necessary to address identified opportunities for improvement, including controlling and correcting nonconformity and enhancing its HSE performance through continual improvement of HSEMS.

A range of performance evaluation tools are used to make recommendations for improvement and to achieve the intended outcomes of the management system. For example, recommendations may emerge from findings raised in internal audits, inspections, meetings, and feedback. To determine and select opportunities for improvement or implement any necessary actions to meet the requirements of customers and relevant interested parties, or to enhance customer satisfaction, SW drives improvement via the analysis of relevant data.

The data inputs for the improvement process include:

- HIRA-AIA, Risk, and opportunity evaluations
- Assessment of the changing needs and expectations of interested parties
- The conformity of existing products and services
- The effectiveness of the management system
- Environmental performance
- Reducing or eliminating adverse environmental impacts
- Reducing or eliminating adverse H&S hazards

- Increasing beneficial impacts and opportunities
- levels of customer satisfaction, including complaints and feedback
- Internal and external audit results
- Corrective action and non-conformance rates

10.1 INCIDENT, NONCONFORMITY AND CORRECTIVE ACTION

Sterling and Wilson empower all personnel to identify, record and immediately report any instances of non-compliance and incidents. An established procedure (**SW/HSE/P013**) details the processes for the investigation of all incidents and non-conformities and identifies the root cause to arrive at the appropriate corrective actions.

The incidents are classified by Near-miss, First aid case, Medical treatment case, Restricted work case, Loss time injury, Fatal, Fire incident, Property damage/dangerous occurrence, Environmental incident, and Vehicle incident.

Non-conformities of the HSEMS requirements are identified through audits and inspections, incident investigation outcomes, hazard observation analysis, compliance evaluation and other requirements, deviations from HSE and other management policies and other related protocols. The deviations are recorded through the online HSE portal and categorised as Observations, Compliant, Partially Compliant and Non-complaint (NC). The finding which is not relevant to the business or HSEMS are termed as “Not applicable”.

The investigation process is detailed elaborately in the procedure which includes the determination of underlying HSE deficiencies and other factors that might be causing or contributing to the occurrence of incidents, followed by the identification of corrective action and opportunities for continual improvements through root cause analysis by using the why-why technique. Corrective actions are implemented commensurate with the magnitude of the problem. The implementation and effectiveness of corrective actions are monitored, and compliance is recorded through the online HSE portal.

10.2 CONTINUAL IMPROVEMENT

Sterling and Wilson emphasise the prominence of continual improvement as a key attribute for the effective performance of all HSEMS by imbuing in all its elements to accomplish its enhancement through HSE objectives by top management’s reviews and encouraging the contribution from all employees. This is achieved through the effective application of our corporate policies, objectives, auditing and data analysis, corrective and preventive actions, and management reviews.

Customer satisfaction, internal audit data, process and services performance data, and the cost of poor quality or risk control are compared against objectives or KPIs to identify additional opportunities for improvement. The overall effectiveness of the continual improvement program, including the effectiveness of any corrective actions, as well as the overall progress towards achieving corporate-level improvement objectives, are assessed through our management review process.

The inputs considered for continual improvement may include but are not limited to, new technology, internal and external good practices, suggestions and recommendations from interested parties, new knowledge and understanding of HSE issues, new or improved materials, changes in worker competence, and achieving improved performance with fewer resources.