

Health, Safety and Environmental Management System Manual

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Health, Safety and Environmental Management System Manual

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1. Introduction

This document aims to provide an overview and general understanding of du's HSE management system. **The HSE system has been developed in accordance with the requirements of the international standards; OHSAS 18001 and ISO 14001.**

This manual specifically describes:

- How the HSE system has been developed in alignment with du's services, processes/activities, its internal and external issues and the risks and opportunities within the context of the organization.
- It addresses the requirements of the standards in the form of the documentation produced such as (procedures, work instructions, forms etc.).

1.1. The Purpose and Objectives of the HSE Management System?

The HSE Management System comprises of a hierarchal structure of processes and documentation to determine, plan and manage activities which will aim to ensure the Health and Safety of its people, visitors, contractors and the sustainability of the environment. This is done through the identification of its internal and external issues, impacts and risks and the appropriate control measures that are instituted or recommended.

The HSE management system intends to:

- Determining its internal and external issues that affect its activities, and HSE management system.
- Identify hazards/aspects and risks/impacts associated with its employees and its visitors,
- Understanding the needs and expectations of its interested parties that affect the HSE management system.
- Eliminate, minimize or control identified hazards/aspects and risks/impacts;
- Ensure compliance obligations to the HSE system requirements against legislative, regulatory and other requirements/best practices; and requirements of OHSAS 18001 and ISO 14001.
- Ensure a continuous monitoring framework and environment that would promote awareness, communication and feedback;
- Ensure continuous improvement cycle of HSE within the context of the organization.
- Ensuring a continual HSE performance process

du's HSE management system is characterized by its strong commitment from top management. Further creating a general awareness amongst all staff members in the organization and imposing a share of responsibility on HSE matters to achieve successful management. The challenge however is to maintain the system over time meeting the needs and expectations of its interested parties whilst addressing its internal and external issues through the HSE management process.

2. Context of the Organization

ISO 14001 and OHSAS 18001 Scope: The Health, Safety and Environmental department falls under the business unit of Corporate Services, Supply Chain and Government Relations.

Provision of services that include activities and Services under the following departments:

- Corporate Services: Initiation and Planning, Acquiring, Development, Maintenance, Management, Optimization and Decommissioning of Commercial Facilities Assets and Services
 - Facilities Projects
 - Facilities Services Operations
 - Asset Management and Compliance
 - Real Estate
- Supply Chain Management: Sourcing and warehouse logistics of products and services
 - Procurement and logistics
- Government Relations: Relationship management between internal and external interested parties

However, HSE implementation will be based on the guidance of the following methods:

- Compliance Obligations (Federal and Local laws and regulations, international or other best practices).
- Company Strategic Direction
- Scope of activities within Corporate Services, Supply chain and Government Relations
- Other business operations and processes

The building scope of the HSE management system includes the following Commercial facilities of du: Please see Appendix for List of sites and locations where applicable.

General Structure of Facilities within du but not limited to:

Office Call center Warehouses	}	Support Services
Retails locations	}	Point of sale: only includes the facility and excludes the business processes.
Core sites Data centers	}	Technology (not currently part of ISO and OHSAS scope of services)
POP (Point of Presence) MDF (Main Distribution Facility) IDF (Intermediate Distribution Facility) Mobile sites	}	

3. Internal and External Issues

Internal and external issues have been identified that influence or affect the HSE system as follows:

Internal Issues	External Issues
Customer feedback/complaints/ incidents	Technological advancements (reporting processes, new products that reduces impacts etc.)
Financial and Value management ((financial challenges, budget constraints etc.)	Economic Backdrop (country situations, improvements etc.)
Performance (time, quality)	Suppliers/Vendor Management
Organizational changes (alignment with the strategic direction of organization)	Regulatory Requirements (carbon taxes, changes in legal requirements/mandates, increased energy/water costs)
Resources & capacity	
Innovation and Knowledge (ensuring competence and skill levels)	
Values and Culture	
Asset failure and risk management (incidents, emergencies)	
Organizational governance requirements (new policies and procedures)	

Such issues, have been taken into consideration during planning, implementation or through the corrective action/ continual improvement cycles as risks, opportunities or improvements.

The various business drivers of the organization are governed by the balance scorecard that then sets the strategic direction for the entire business and the scope of the HSE Management systems direction. In its endeavor to ensure that alignment to its overall strategic directions; the set targets and objectives are aligned to Corporate Services mission and service delivery which translated through it Quality and HSE polices. One of its key drivers is its Sustainability approach that covers the areas of:

- Social (people based, addressing internal and external people affected by our activities)
- Environment (internal and external environment impacted by our activities)
- Economic (financial sustainability of activities)

4. HSE Policy and Responsibilities

4.1. Health, Safety and Environmental Policy

It is the policy of du to provide a safe and healthy work environment for its employees and visitors. In conjunction to this it shall ensure that the environment is protected and conserved where reasonably practicable by ensuring sustainable environmental practices.

The HSE policy governs and guides those that may be affected by its activities and includes du staff members and du visitors for example; contractors working on site or members of public. Details of the HSE policy statements can be read on du-HSE-PO-001

It holistically ensures the following are met:

1. To ensure effective planning, implementation and monitoring of our workplace design and operational activities that promotes a safe workplace, wellbeing of its occupants and protection of the environment.
2. Identify, evaluate and control our occupational risk factors, environmental aspects and impacts that have a significant impact on our employees, visitors and the environment.
3. It reiterates compliance obligations to applicable UAE legislation and other relevant requirements
4. Ensuring its Internal and External issues as part of the HSE management system to ensure the safety and sustainability of our business
5. It Indicates commitment to prevention of Pollution and Ill health.

6. Promote continued information, instruction, training and supervision as necessary to ensure its HSE awareness and practices.
7. Promote a continual improvement and measurement approach towards wellness programs, HSE performance aimed at employee protection, prevention of injury and employee welfare.
8. Ensure the measurement and reporting of carbon emissions that affect climate change
9. Promoting green initiatives that reduces our overall environmental impacts and promotes sustainable practices and environment.
10. It should be reviewed annually to determine its applicability to the scope and objectives of HSE management that leads to continual improvement.

The policy is currently communicated and awareness practices continually promoting its effective implementation:

- On the du intranet site. This site is accessible to du employees.
- Available on request to interested parties such as suppliers.

4.2. Leadership Commitment

Our HSE strategy is driven by the UAE's commitment for a Greener, happier Community, which is then translated into the various organizational requirements.

Top management (CEO) has shown its commitment through signing of its HSE policy and further delegating authority to the Chief: Human Capital to ensure its effective implementation. (Refer to appointment form –du-HSE-FOR-015).

Top management of du-Corporate Services has committed and shown its accountability through its establishment, implementation and continual improvement of the HSE management system. Through its set objectives top management promote its intention to deliver on ensuring a safe working environment for its staff and visitors as well as protection of the environment which forms part of the strategic direction of the organisation.

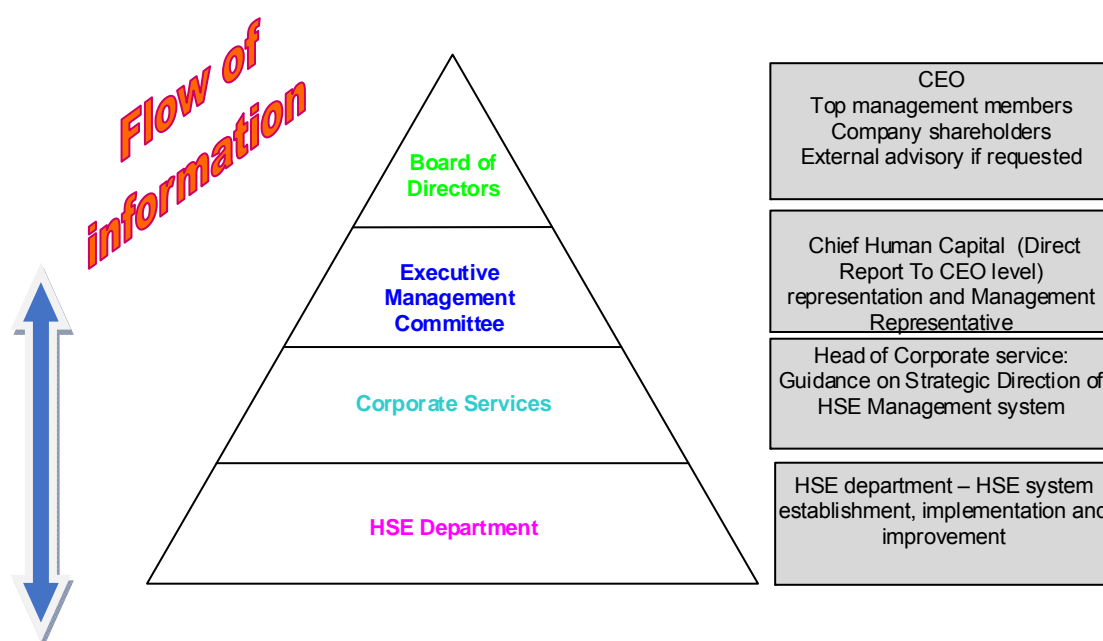
It firmly believes in ensuring continual improvement within the development of its business processes combined with its stability and growth of roles and responsibilities through the establishment of the HSE Management System. It has to be communicated to all staff and or other management levels, the importance of HSE requirements and best practices in conjunction with Compliance Obligations set forth.

The management commits to provide adequate and timely resources for the establishment of the systems as required in order to assess the effectiveness of the systems.

Our governance structures provides the necessary support for creating and establishing the appropriate processes that are important in maintaining and achieving our set objectives and policies.

In addition, our continual improvement process ensures a systematic verification of effectiveness through internal audits and management reviews.

In ensuring effective channels for participation, consultation, communication and involvement within higher management; four levels of responsibilities have been designed to support the HSE implementation. HSE responsibilities are shared, driven and maintained throughout each one of the four identified levels by means of consultation and participation:



4.3. Stakeholders and Interested Parties

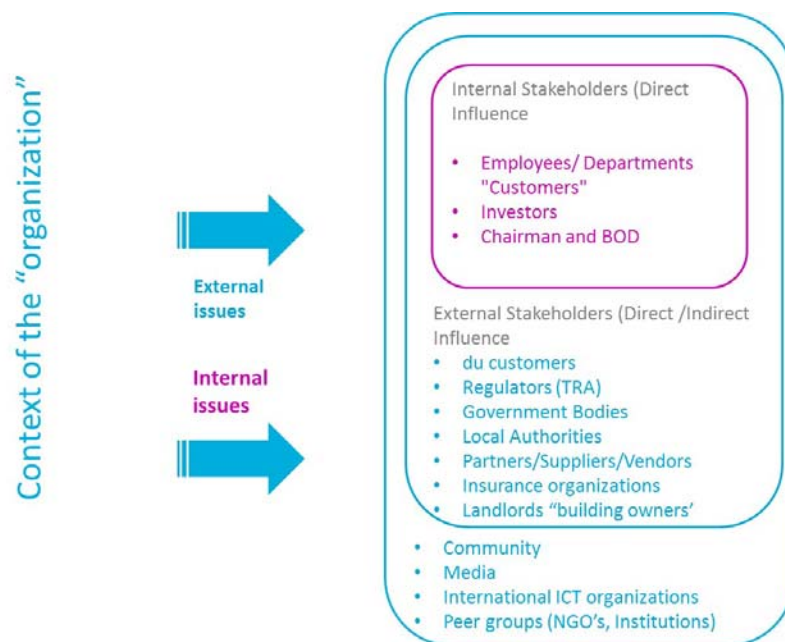
Our stakeholders are vital to the effective management of the HSE system. The stakeholders have been categorized into internal and external groups that influence and or form part of The HSE management system.

Participation and consultation of our stakeholders arises through various methods applied in the organization:

- **Internal Stakeholders** are involved through but not limited to meetings, workshops, training sessions, surveys and or reporting through our enterprise asset management platforms (Maximo).
- External stakeholders are involved directly or indirectly through the following ways:
 - Directly/indirectly through:
 - vendor workshops, audits
 - direct involvement of Local authorities, Government bodies, regulators and or landlords through inspections and or approvals.
 - Insurance organizations through formal incident investigations, and or through claims processes.
 - Our customers to du are involved through our company surveys
 - Our internal customers provide feedback through internal surveys, through our employee engagement survey done annually and or, directly providing feedback via our Maximo systems or through email/verbal communications.

Our Interested parties such as Community's, NGO's, Peer Groups etc. provide feedback through formal (Direct) or Indirectly through the ffg methods:

- Indirect/Direct methods:
 - Sustainability workshops
 - du Forums that engage with our partners/suppliers
 - Requests for information from organizations during tender submissions
 - NGO platforms
 - CSR activities
 - Events and workshops
 - Consultations through memberships and reporting platforms (CDP, GRI)



Through the following interactions, the needs and expectations of our stakeholders and interested parties are understood and translated into the HSE management systems through the corrective action process or through opportunities that improve the system.

4.4.Roles, Responsibility, Accountability and Authority for Health, Safety and Environmental

The successful implementation of the HSE is dependent on the involvement and participation of all its stakeholders and ownership of the different internal roles and responsibilities allocated at various levels within du's hierarchy of departments and management.

Therefore, any person entering or working within du premises or under the authority of providing du services shall ensure that applicable HSE standards are followed and implemented where practicable. The responsibility stems from taking the initiative to consult with the HSE department to understand and familiarize oneself to the companies HSE standards and guidelines.

Accountability is ultimate responsibility, and relates to the person who is held accountable if deviation arises that was within the control of the individual. The various roles can be further delegated to employees or line functions to ensure an effective HSE implementation.

The Individual having authority shall stop work that is unsafe to people (employees and visitors), property and the environment. This would take into account all life threatening situations that cannot be controlled immediately and or extensive damage to property or the environment that is irreversible. Where, work has been stopped, then appropriate justification as to the reasons shall be submitted to the HSE department for investigation and the respective departments or vendors.

Clear defined roles, responsibility, accountability and authority have been communicated as part of the du HR Employee Handbook and shall be addressed as follows:

4.4.1. Employees

- Are required to take all reasonable steps to protect their own safety, as well as the safety of colleagues, customers and members of the public.
- Are required to familiarise and adhere to any legal requirements, HSE practices, standards and procedures developed and implemented.
- Are to adhere to the use or wear of equipment, protective devices or clothing that may be required for his safety.
- Are to report to their line manager or supervisor the absence of or defect in any equipment, safety devices, and or working environment which may endanger him/her and others.
- Shall comply and support all HSE initiatives instituted on du premises.

4.4.2. Line Management

- Each line manager will ultimately be responsible for ensuring the full implementation of the required HSE standards and procedures.
- Line Manager will be responsible if there are any risks associated with the activities of the section or team under him/her.
- Report any deviations and or risks identified to the relevant departments.
- As part of the duties of line management, it shall be their responsibility to adopt and implement environmental initiatives within their processes and operations so as to work towards a sustainable environment.

4.4.3. Outsourced Vendors and Visitors

Vendors shall be deemed to have familiarized itself with du's Health, Safety and Environmental Policy and Procedures (where applicable) before entering into a Contract and shall at the commencement of Services ensure its personnel are fully familiar with du's HSE Policy and procedures.

1. All vendors shall be subjected to a HSE compliance assessment through the supply chain process as defined under section 13
2. The vendor or any sub-contractors shall ensure that the services are carried out in accordance with the rules and regulations provided by the UAE law and with safe working practices. The vendor shall further comply strictly with du's Health, safety, and environmental requirements under the guidance of its HSE policy.
3. The vendor or any sub-contractor shall provide and maintain at all times during the progress of the services adequate measures to safeguard all persons, equipment, property and the environment.
4. The du HSE department from time to time may request the respective vendor to stop any work activities where a hazardous situation may arise or potentially arise. Further were services are carried out off site (away from du premises) then the HSE department may have the right to inspect and ensure such activities are carried out in accordance to all applicable HSE standards.
5. All visitors to any du premises shall ensure that they adhere to the rules and regulations specified within the area/premises. This is monitored and addressed through security measures and visitor management systems. du employees shall also be responsible for his/her visitors while on du premises.
6. Visitors such as customers to our du premises shall follow the requirements of HSE whilst on our premises in the interest of their safety. It would be the staff and management of that location to ensure any incidents arising out of or in connection to that visitor be reported to the HSE department.

Refer to the Vendor guideline book – du-HSE-PRO-012 for specific details on contractor guidance and adherence to HSE practices

4.4.4. Representative Roles for HSE – Emergency Coordinator

The emergency coordinator (floor and building emergency coordinator) will assist during

- Evacuation and
- Any first aid/medical emergencies

Emergency coordinators are designated in accordance to each floor area of office buildings. During any emergency, ensure that the emergency coordinator or security personnel are contacted so as to provide assistance as defined under section 9.

Emergency Coordinators shall be responsibly to address all identified emergency situations where trained to do so, however accountability will be determined upon an investigation after an emergency situation or incident that may arise.

4.4.5. Security Personnel

The identified security personnel are allocated within du facilities. They are responsible and accountable for the overall security of each facility in ensuring the safety of staff and property/equipment against damage.

The security personnel will ensure that the following are carried out:

- Provide assistance during emergency situations that may arise.
- Reporting of all incidents that are identified and reported.
- Implement all Health, safety, security and environmental policies & procedures set forth by the HSE department.
- Provide guidance and assistance to any visitor at du premises

Refer to the security manual for any further guidance on the security policies and procedures.

4.4.6. HSE Department

HSE department and representatives identified are tasked to assist management in their responsibilities of:

- Identifying and controlling risks & impacts;
- Aid in reaching set Objectives and Targets;
- Maintaining of the HSE policy;
- Ensuring that specific operational activities are aligned at each level;
- Ensuring overall HSE performance and continuous maintenance and improvement of the system and
- Reviewing of the HSE system at planned intervals

Refer to the HSE governance structure du-HSE-PRO-027 to determine the overall roles, responsibilities, authority and accountability within the HSE system.

4.5. HSE Objectives and Targets

The approach used to establish the objectives and targets are one of discussion and mutual agreement between the relevant du Line Functions and the HSE Department. Specific attention is given to objectives and targets being realistic, measurable and achievable. Objectives and targets are reviewed at planned intervals and in line with scheduled Management Reviews of the HSE system. There will be at least one review of the HSE system and associated documents per year.

HSE Objectives and Targets are set with the projection of addressing the following requirements:

- Meeting its required HSE Policy commitment set forth by the strategic direction of the organization
- The high Aspects/Hazards, risks/impacts that affect its people, environment or sustainable business operations.
- Compliance obligations, through regulatory and legal compliance matters or best practices that affect or improve the organization.
- Specific initiatives that the organizations set to be achieved as part of business processes or departmental goals.
- Opportunities that improve the HSE management systems and or initiatives to promote a sustainable practice (e.g. feedback from our stakeholders, new innovations, competitive advantage).

Such Objectives and Targets are respectively documented within the HSE system where monitoring in terms of its achievement are measured accordingly.

Objectives and Targets are set according to the specific achievements to be reached as per the HSE Policy and category & priority of the Risk/Impact Register. Indicators are established and implemented to show progress against the set objectives and targets. Further processes established to measure progress of set objectives and targets are:

- Nonconformity Process;
- Measuring and Monitoring Process;
- Internal and External Audits and the
- Management Review Process

Objectives and Targets are communicated within the organization by line management to create awareness and a culture of working together to achieve these amongst the staff members.

Refer to a defined process of the set Objective and Target within du-HSE-PRO-029 and Objective and Target Form – du-HSE-FOR-016

5. Compliance Obligations

5.1. Regulatory Compliance

du as a company based in the UAE complies with all applicable UAE legislation. Emirate specific orders and guidelines and applicable international standards form the basis for HSE system development, implementation and compliance. Compliance herein refers to the UAE Federal Law, Local Orders and Technical Guidelines that are mandatory for business to comply to.

Benchmarking and research are done where necessary and applicable international legislation and standards are used to further develop and improve du's HSE system. Legislation or others requirements are continuously identified collected and analyzed to evaluate its applicability with respect to du's activities and processes

Any new legislation or amendments to current legislation is reviewed by du's HSE department and where required legal departments to ensure the understanding and context of the legislation is applied correctly.

The identified applicable legislation is then linked to the various risk/impact identified to determine its criticality status. A non-compliance or non-conformance to the applicable legislation or other requirements adopted by du will be registered on the Risk/impact Register and managed according to the category and priority set forth. du will continuously align its risks to applicable legal requirements.

Legal Compliance is to be measured and monitored during Management Reviews of the HSE system, including documents and applicability thereof. Audits are conducted within du as per the audit schedule available within the HSE Department to confirm compliance and conformance to the Legal and other relevant HSE management system requirements.

The respective legal departments within du will provide assistance in understanding and reviewing any applicable HSE legislation set forth. Further the Internal Control departments of du ensure verification and compliance to HSE requirements.

Refer to *du-HSE-PRO-020* for the HSE Legal Requirements Procedure and *du-HSE-FOR-006* for the HSE Regulation Compliance Form.

5.2. Violations/Fines and Disciplinary Actions

5.2.1. Company Violations/Fines

Any HSE Violation/fine in terms of Legal noncompliance issued by the external regulatory bodies shall be discussed and forwarded to the HSE department for further review and investigation.

Such investigations shall involve the various affected departments and the legal department so as to ensure such violation is rectified and such situations do not arise again. The legal department shall provide assistance on HSE matters that result in judicial representation.

5.2.2. Employee Violations and Disciplinary Actions

Where an employee/s are found to be in violation to HSE policies and procedures of the company, then appropriate disciplinary action shall be taken. Investigations shall be conducted by the required departments (HSE/ HR) to determine the course of actions deemed necessary.

An HSE incident report and/or violations report shall be issued and the respective HR policies on disciplinary action will be followed.

5.2.3. Vendor Violations

Where a vendor or contractor on site is found to be in violation to du's HSE policies and procedures then appropriate action shall be taken by notifying the respective company on the issue via Procurement policy and commercial agreements.

Depending on the severity of the violation, then either work or services shall be stopped to ensure the health and safety of people or protection of the environment. Notification shall be submitted to the respective company for immediate rectification. Resumption of work will only be done once all measures have been taken to ensure safety of people and protection of the environment.

The HSE department may then advise the requestor of services and Procurement on whether to continue with the services of such company/s.

5.2.4. Regulatory Inspections

Any authorized inspections carried out by the various UAE regulatory authority such as Dubai Municipality, Civil Defense, Dubai Police, Safety Regulatory Agency, zoning authorities etc. shall ensure that the relevant departments of du are notified where applicable as a minimum:

- Government Relations
- Legal
- Line functions of the business function for which inspections are carried out,
- HSE departments where it affects and involves HSE inspections.

Where inspections are pre-planned, then it is the duty of the affected department to notify the relevant internal departments of the inspection and intent thereof.

Where inspections are random and unscheduled then it is advised the applicable departments ensure all appropriate information and actions are taken. Notification to the HSE department, where applicable should be done after the respective visit of the Government authority.

Inspections conducted by civil defense authority and Dubai municipality should be pre-planned and notifications must be sent to the HSE departments so that appropriate internal communications and actions are taken.

5.2.5. Non-Regulatory Inspections

Inspections/audits conducted by third parties such as (insurance company representatives, external auditors etc.) shall ensure that they are pre-planned within du premises and notification sent internal to the relevant departments:

- Line functions of the business function for which inspections are carried out
- HSE departments where it affects and involves HSE inspections

Random inspections conducted by 3rd parties where du provides a service for a client then a formal report of findings shall be submitted for which this shall be communicated to the du HSE department for record and information purposes.

Where Corrective/Preventive action is required for compliance to the Regulatory or Non-regulatory Inspections, then appropriate measures shall be instituted by the relevant department.

6. Hazard Identification Risk Assessment/ Aspect & Impacts

6.1. Overview

Identification, evaluation, rating and reporting of HSE risks, hazards, aspects, incidents and impacts form the foundation of the du HSE management system. The objective of the hazard/aspect identification process is to proactively control and manage potential risks/impacts to prevent occurrence of such or take appropriate action to prevent recurrence. These activities forms part of the key focus areas of line management (responsible parties) and will be measured through set Objectives and Targets, corrective action cycles and emergency / incident management.

Through the consultation and participation process of its stakeholders and interested parties- suggestions, ideas and potential risks are also identified and are either raised as opportunities for improvements or added as additional/potential risks/impacts that would affect the HSE system holistically.

A Risk/Impact register has been compiled and implemented for the specific identification, analysis, recording and monitoring of:

- Significant effects that du activities may have on the environment;
- Health and safety hazards and risks and the associated impact it has on its staff members, Visitors and community.
- Compliance obligations that are not met
- Control measures applied to reduce risks/impacts to ensure a continual improvement process.
- Opportunities that are identified as continual improvements.

The Risk/Impact register is centrally managed by HSE department where trends and statistics are compiled regarding risk/impact occurrence and recurrence. Risk profiles are drawn up per category to understand and interpret risk occurrence and recurrence better. The risk/impact register also indicates the priority of certain risks/impacts and if risks are closed out with appropriate actions taken.

Originally hazards/aspects were identified through a process of site visits (*Visit report form – List of typical questions for site visit available*), inspection and incident history. This provides a life cycle perspective based on workplace environment, staff activities, processes, historical data, recorded incidents, changes and potential situations that arise from failure and or non-adherence. Once identified; risks/impacts are

then rated and placed into categories in terms of its severity and probability. Risks/impacts are prioritized to determine the highest or most significant. Based on the risk/impact rating, appropriate controls and measures are put in place to reduce or eliminate these risks/impacts.

The register content is also aligned with the applicable legislative components to ensure compliance obligations. Effective implementation of the HSE systems is shown partially by managing the organization's risks.

6.2. Responsibilities for Risk Assessments

6.2.1. Line Managers

It shall be the responsibility of all line managers to ensure that work undertaken are without risk to staff and the environment.

Proper planning prior to conducting work activities shall ensure health and safety risks and environmental aspects are known and controlled where possible.

The respective line manger shall ensure that reasonable control measures are taken to protect against dangers identified. Control measures shall be appropriate to the tasks and shall follow a hierarchy of implementation (Refer to Control of Hazards/Risks within this section).

Line management shall ensure that regular in-house department inspections are conducted as necessary and reported on. Where deviations arise, and then adequate corrective actions must be applied and followed –up to ensure recurrences do not arise. It often takes several follow-up checks to ensure a safe working environment.

6.2.2. Employees/ Vendors/Visitors

It is the responsibility of every employee, contractor or visitor to ensure that reasonable care is taken when conducting any work on site or accessing a premise.

Such individuals shall adhere to complying with all health and safety measures instituted, in the interest of safe guarding oneself.

All unsafe conditions or acts must be reported immediately to the respective line function and or directly to the HSE departments. Where a situation that is unsafe can be controlled by staff/vendors; then appropriate measures must be applied immediately without endangering oneself.

6.3. Procedures on hazard/aspect identification

The HSE department has documented hazard/aspect procedures that are applicable for the following areas:

- Health and Safety hazards/risks,
- Environmental aspects/impacts.

The Procedures *du-HSE-PRO-011 for Environmental aspects identification procedure* and *du-HSE-PRO-006 for Hazard identification risk assessment procedure*.

These documents will specifically highlight the following requirements:

- What are health, safety and environmental hazards/Aspects?
- How they are identified and managed?
- How are hazards and risks classified and rated?
- What control should be implemented?
- Who is responsible to identify and manage hazards/Aspects?

6.3.1. Hazard/Aspect Identification

A risk assessment is simply a careful examination of what, in your work, could cause harm to people, so that you can weigh up whether you have taken enough precautions or should do more to prevent harm.

Hazard will be identified through these areas, however are not limited to the following:

- **Inspections:** walk around the workplace and look at what could reasonably be expected to cause harm. Through these routine inspections conducted by staff, line managers and or HSE department, will provide a mechanism of identifying possible dangers.
- **Ask your employees** or their representatives what they think. They may have noticed things that are not immediately obvious to you.
- **Routine activities** (normal work processes and job tasks).
- **Non-routine activities** like shift work
- **Abnormal activities** e.g working in confined spaces, or temporary works causing pollution.

- **Review of incident and ill-health records** – these often help to identify the less obvious hazards like near misses and first aid injury types.
- **Check manufacturers' instructions** or data sheets for chemicals and equipment as they can be very helpful in spelling out the hazards and putting them in their true perspective.
- **Remember to think about long-term hazards to health** (e.g. high levels of noise or exposure to harmful substances) as well as safety hazards.
- **Human Behavior and other human factors** – this may include negligent work practices, psychological factors that affect employees.
- hazards created in the vicinity of the workplace by work-related activities under the control of the organization;
- **Changes to compliance requirements** or amendments to law that will increase the risk evaluation.
- **Changes to work procedures**, such as work instructions, that must be communicated to ensure safety requirements are fulfilled. This will become applicable when there is a non adherence to work methods and procedures.
- **Activities or work processes that affect the public and or visitors to du premises.**
- **Identified hazards originating outside the workplace** capable of adversely affecting the health and safety of persons under the control of the organization within the workplace (neighboring activities).
- **The design of work areas, processes, installations, machinery/equipment**, operating procedures and work organization, including their adaptation to human capabilities. This will review the workplace infrastructures, ergonomic designs and processes that are safe.
- **Have employees identified any problems?** Reviewing meeting minutes for major deviations and suggestions.
- **Changes in the work environment** such as:
 - New equipment/services/products, new processes/ installations, new buildings
 - Temporary control measures implemented by the business.
- **Emergency situations resulting from an incident.** E.g. fire causing impact on staff safety and environmental conditions.

Therefore it is the responsibility of each and every individual to review the possible risks that may arise prior to carrying out any work activity so that adequate measures can be applied to protect oneself.

6.3.2. Risk Reporting

All hazards identified should be reported, whether they impact/affect individuals or the environment. This should be reported to the respective line manager, so that immediate control measures can be instituted.

It is then the responsibility of the line manager to ensure that risks/impacts are communicated to the HSE department to further provide assistance on control.

Risks can be reported either by the following means, however not limited to the following:

- Email communication to the HSE department.
- Completed Incident forms
- Minutes of meetings which are then communicated to the HSE department
- Other department's procedures/process that identify risks.
- Verbal Communication
- Site inspections/ Audit reports
- Violations/Fines or Non-conformances
- Enterprise Asset management reporting (maximo) workflow assignments for corrective actions to be taken.

All risks reported will then be updated on a master risk register which is managed by the HSE department as per forms *du-HSE-FOR-001 for Environmental risk analysis* and *du-HSE-FOR-002 for Health and Safety risk analysis*.

6.3.3. Risk Evaluation

A risk rating matrix is used to determine the significance to the hazards/risks by ranking it and classifying according to their **Frequency** (Probability), **severity** level and sensitivity of the site for environmental requirements. The following does explain the occurrence of the hazards/risks and their impacts to the employee:

On completion of identifying the level of criteria a risk score is calculated

Risk Score = Probability x Severity

The value determined here (between 1 and 25) indicates the priority of having to deal with the risk, where 25 are the highest priority and 1 the lowest.

SEVERITY

PROBABILITY		1	2	3	4	5
	1	1	2	3	4	5
	2	2	4	6	8	10
	3	3	6	9	12	15
	4	4	8	12	16	20
	5	5	10	15	20	25

	≥ 1 but ≤ 3	Low risk level	= NOT SIGNIFICANT
	≥ 4 but ≤ 8	Average risk level	= SIGNIFICANT RISK
	≥ 9 but ≤ 25	High risk level	
	>1	Acceptable risk	As low as Reasonable Practicable

The risks identified shall be prioritized into the following categories:

- High Risk indicated by red
- Medium Risk – indicated by amber /orange color
- Low risk – indicated by green color
- Acceptable Risk – indicated by blue color

The procedures guides the user to focus on the prioritizing of risks and ensure that proper Preventive and / or corrective actions are put in place, controlled and monitored.

6.3.4. Risk/Impact Control

Any risk should be controlled with the intention of removing or taking the risk away totally, hence the principle of control should focus on terminating or eliminating the risk. It is understood that all risks cannot be eliminated and as a business find ways to treat the risk to levels that are acceptable or low.

Therefore risks should be controlled to as low as reasonably practicable by the relevant departments and should be deemed as “acceptable levels /risks”. Such risks will remain on a risk register and be monitored thereafter, if not eliminated to changes that arise.

In controlling all risks, time scales must be allocated so that control measures will be implemented depending on the priority such as:

- L (low/ Tolerable) must be attended to preferably within the first year of identification. This takes into cognizance financial constraints and the low level of the risks. Risks that will be considered low risks are risks referred to as “Acceptable Risk” meaning that all control measures have been implemented as far as reasonably practicable.
- M (Average/Moderate) should be attended to within the first six months of identification. However all risks must be attended to as soon as it is reasonably practicable. All medium risks should be reduced to acceptable levels by instituting appropriate control measures.
- H (Significant/High) risks should be attended to immediately within a maximum time frame not exceeding three months for rectification. Dependent on severity and scope of control measures to be used, the business can institute interim controls to reduce exposures or consequences, but should not be considered as a final implementation. All high risks shall be reduced eventually to acceptable risks. Legal non- compliance shall be considered as a significant risk as this is a violation in terms of law.

There are various principles of risk control. The methods used by business will be classified as:

- **Elimination:** modify a design to eliminate the hazard, e.g. introduce mechanical lifting devices to eliminate the manual handling hazard.
- **Substitution:** substitute a less hazardous material or reduce the system energy (e.g. lower the force, amperage, pressure, temperature, etc.)
- **Engineering control:** it consists of installing ventilation systems, machine guarding, interlocks, sound enclosures, etc.
- **Signage/warnings and Administrative Controls:** it consists of installing alarms, safety procedures, signage and instructions, and access controls.
- **Training:** it consists in knowledge required to understand the risk so that safety measures can be adopted.
- **Medical Surveillance control:** it consists in Medical analysis is used for the proactive detection of exposures from risks, and should be used with the objective of planning and preventing overexposure.
- **Personal Protective Equipment control:** it consists in PPE is a control that only reduces the exposure or risk. Personal Protective Equipment (PPE) must be used where administrative or engineering control cannot effectively reduce the hazard of an operation or

piece of equipment to an acceptable level. PPE may also be used on a limited basis for those operations where engineering controls are feasible and in the process of being implemented to control an operational or equipment hazard.

6.3.4.1 Opportunities

Opportunities can arise from the many communication platforms and best practice approaches identified through the HSE management system. However one of the ways opportunities are identified is through the risk/impact register where control measures are applied to reduce or manage the risk/impact. Through this activity of control and investigation, opportunities for improvement are better understood and can be applied based on research and feasibility of application. Opportunities are in no way a substitute for the initial control measures nor is it identified as the only control measures. It should be understood that control measures applied to any risk/or impact should be a priority to reduce that risk/impact.

6.3.5. Risk/Impact Communication

All hazard/ aspects and risk/impacts are to be communicated, so as to inform and instruct in respect to the dangers associated with the working environment.

It is the responsibility of each line management to inform new and existing employees of risks/impacts within their working environments.

Any risks identified in terms of affecting Health and Safety of Staff and the environment must be communicated to the HSE department where this will be entered into the master risk database and be monitored thereof.

Line function shall implement control measures where appropriate and also update the HSE department of its progress.

Communication should be done, as described in communication procedure (du-HSE-PRO-004)

7. HSE Training Requirements

7.1. Overview

HSE training in du is considered as a means of providing awareness to promote HSE matters and to control, prevent or reduce risks based on HSE practices and relevant information provided to staff members during training. It also aims to equip staff with the knowledge to conduct work activities safely so as to reduce any work related incidents.

HSE Training in du focuses on:

- Empowering staff members through sharing knowledge of HSE matters to ensure they assist in continual HSE system performance;
- Conforming to the HSE Policy requirements;
- Knowledge and compliance to applicable legislation;
- Identifying, categorizing and prioritizing of hazards and risks and information thereof,
- Familiarizing with applicable processes and procedures to enable corrective or Preventive actions implemented

Training needs are formally requested either by completing a training evaluation from (HR training form) or submitting a request to the HSE department, that requires the following information:

- HSE risks and impacts identified that require staff members to be trained;
- Non-conformances or audit findings that indicate training needs;
- Specific job related tasks that require training for safety measures;
- Mandatory training required by legislation;
- Re-training or refresher training for reasons such as:
 - Changes in the business / activities in a department / unit;
 - Certificates necessary to be renewed due to validity dates expired.

It is required by the HSE Training Procedure (document number: du-HSE-PRO-028) that line management within all departments / units provide their training needs on an annual basis to the HR training department. This will enable the HR department to conduct proper planning regarding du's training needs. It is Top Management's responsibility to approve and budget for the training needs of their respective departments / units.

7.2. Responsibilities for HSE training

7.2.1. HR training Department

The HR training department within du, plays an integral role in the aligning and scheduling of requested types of trainings. This would then follow the HR Policy and procedures.

Where HSE trainings are requested, it would then be the responsibility of HR to advise the HSE department, so as to ensure its training requirements meet the objective of the requestor and its risk/ or activities.

All training records such as certificates, attendance registers, training evaluation etc. will be archived within HR training departments and copies shall be made available upon request by HSE.

7.2.2. HSE Department

The HSE department will ensure that the all training requests received from the business are evaluated in terms of the following:

- Relevance to the specific task/activity
- Addressing risks identified.
- Empowering staff to work.

The HSE department will review the following:

- The contents of the training material to ensure its applicability
- The supplier and methods used to deliver the material
- The regulatory requirements that are applicable

It is also the responsibility of the HSE department to also recommend and advise the business on training requirements.

The HSE department may also conduct in-house trainings, workshops etc. to better communicate its HSE systems and process and procedures. Such records are archived and or shared with HR training as required.

7.2.3. Employees/ Line Managers

Through the hierarchy of management, each line manager shall address his business function and conduct a training needs assessment required for his/her department functions/activity.

The need for training can be discussed during meetings and or directly with the relevant departments (HR/HSE). The line manager is then responsible to communicate the need to HR and HSE department. Both are responsible to plan and ensure the effectiveness of the training.

Line Managers shall ensure that:

1. Each new employees or vendors receive HSE Orientation/Induction training.

2. Trainings are conducted regularly so as to review and/or to address new issues.
3. Training records are maintained and made available.
4. Ensure that the employee receives training that is specific to his activity/tasks.
5. Review and evaluate training program in order to maintain a high level of effectiveness and interest in safety subjects.
6. Employees are to ensure that they:
 - Attend and participate in all safety training classes.
 - Provide feedback to Managers on the effectiveness of training classes for improvement or indicate additional subjects of interest.
 - Study all materials provided and apply the knowledge to your job tasks.

7.2.4. Vendors/Suppliers

It is the responsibility of all vendors to ensure that any individual (s) conducting services for du are competent and trained in the respective area of service delivery.

It would be the responsibility of the respective departments to ensure that the following is verified and conducted:

- Vendors undergo a safety induction prior to receiving to any du site or work activity.
- Vendors provide proof of competency for specific /specialized tasks. (Training certificates/attendance records).

As a minimum, every vendor providing an onsite service on du premises shall ensure that there is at least one person trained for the following:

- First Aid
- Fire Prevention and Awareness.
- Risk Assessment

7.2.5. Types of Trainings

a) General awareness and knowledge

Through its policy du commits itself to provide general awareness and education on Health Safety and Environment for its employees, independently of its position and responsibility in the business.

All employees must know the content of the policy and its expectations and also general knowledge on the Safety and Environment impacts of its own workplace inside the company.

b) Legal compliance

Compliance training will cover the requirements stipulated by legislation for the tasks that requires specialized skills, “First Aid”, “Hot work”, “Electricity System Maintenance”. A training program will be put into place to follow the progress and the coverage of the designated persons, as governed by the requirements of law. Refresher training will also planned according to the validity of the training in time.

c) Job/Activity specific training

Technical operations within du cover a high risk factor due to the complexity of work operations in conducting the services of du. Therefore, any activity involving specialized knowledge and or information must be assessed, and training provided. These trainings can be identified through training needs analysis for each department.

d) New employee training

A general awareness session must be organized for any new employee of the company during the first month of work. This training is automatically scheduled during the registration of the new employee. Job specific training can be part of the new employment process depending of the position and background of the person. The objective is to provide new recruits and assignees to new/different jobs with a basic awareness of the hazards of the job and a basic ability to conduct them in a sensible manner to avoid incidents.

e) Contractor/Vendor training

Training for contractors will be done through the contractor’s employers. du may request copies of such training as and when required for the project scope. This will address specific tasks/job training that is required by the HSE department (e.g. confined space, tower climbing, hot work permit). Where the training is unavailable or insufficient the HSE department may request the contractors to either attend a du in-house training course to address the project scope/need.

Further induction training will also be given to contractors, through line management notification to the HR or HSE departments.

7.3. Type of training method

Training may be delivered through a class based method or E- learning platforms to provide the adequate knowledge and skills for the respective courses. This can be delivered through external service provider, or in-house trainers.

7.3.1. External Service Providers

du can contract training providers to respond to the need of training for its employees. Qualifications of the training provider must be applicable to the area or region (United Arab Emirates) and are at the discretion of HR and HSE department to determine its relevance.

Training providers shall have all the necessary accreditations and qualifications applicable for the relevant courses advertised before being appointed. Training providers are to submit course outlines, so that an understanding of the content is understood by du before accepting any training schedules.

7.3.2. In-house/internal Training Programs

In house training entails the development and conducting of training within du, either by specialized/competent employees of du. This training will cover the company HSE risks, where accreditations are not required by legislation. It will form the basis and provide an understanding to individuals by informing and illustrating the best, safest and environment friendly work methods to use. It may also provide a general awareness framework, where it can be used as a refresher course.

Where in house training is provided for HSE, the respective course material must be mandated by the HSE department for approval. This is to ensure all aspects are covered and are applicable to Health, Safety and Environmental requirements.

7.4. Training Records

The results of the HSE trainings assessment shall be documented. This may form components of the training such as:

- Attendance register, signed by individuals.
- The specific course materials / or scope of training content.
- Training certificates issued, if applicable. (Training certificates, if and when issued will remain in the Employees personal file, whilst a copy will be made available to the employee. Upon leaving du, the employee personal records such as certificates will be issued to him / her.
- Results from any competency testing such as examinations, test etc.
- Training evaluation forms

In addition to the items above, the documentation shall include:

- The names of those that conducted the assessment
- The date of the assessment
- If delivered by an individual, the name and qualifications of the trainer
- Where required, the expected competency level necessary to successfully complete the training

Documented records shall be maintained for all HSE training programs in accordance with document and records management (*document control du-HSE- PRO- 023*).

8. HSE Incident Reporting and Investigation

8.1. Overview

All Incidents relating to HSE that are work related shall be reported via the Enterprise Asset Management System: Maximo to the HSE department for further investigation. They can be defined as follows:

- Near misses,
- Injuries (First aid to disabling injuries)
- Environmental impact
- Damage to property
- Security related incidents (Theft, lost & Found, Violence etc)
- Vehicle Incidents and Accidents
- Facility related incidents (power outages, spillages etc)

These incidents shall be recorded using the incident form (du-HSE-FOR-010) which can be accessed from the du intranet website. Once completed, these forms should be sent to the HSE department for further investigation to ensure prevent recurrence.

For a detail procedure on the various protocols of incident/accident process then please refer to the Incident/accidents Procedure (du-HSE-PRO-014)

8.2. What should be reported as an Incident?

Health and safety matters

- Incidents involving employees, including minor injuries (First Aid injuries)
- Incidents where no one is injured but there was a potential for injury or damage (e.g. trips and falls)
- Incidents involving non-employees e.g. visitors, contractors
- Work – related illnesses, such as
 - skin infections, from the use of chemicals
 - musculoskeletal pain from poor ergonomics

Environmental matters

- Dangerous occurrences such as dangerous smoke during fires or pollutant emissions,

hazardous products spillage.

Security matters

- Damage to property
- Lost or stolen items
- Theft
- Violence and abusive behaviour
- Smoking in undesignated areas
- Dangerous occurrences

8.3. Responsibilities for Incident Reporting and Investigation

Where an incident has arisen, it is the responsibility of the employee/vendor to ensure that the respective control measures are instituted. Upon which notification shall be made to emergency personnel:

- Civil defence: 997
- Police/Ambulance Services: 999/998

It would then be the responsibility of the person/company to notify du line management/representative immediately thereafter or directly to the HSE department.

An incident form must be completed for all incidents (du-HSE-FOR-010).

Refer to the emergency procedures du-HSE-PRO-026 to further understand emergency reaction and requirements.

8.3.1. Employees/ Line Managers

Employees:

- It is the responsibility of all individual employees who are witnesses or victims of any incident to report it to their line manager or the HSE department or HSE representative on site as soon as possible.
- Assist and participate as requested in all accident investigations.
- Provide all information that may assist in an investigation
- Report all hazardous conditions and near-misses immediately to Supervisors, Managers or HSE department.
- Report all incidents that resulted in sick days taken to HSE and HR departments respectively.

Line management must ensure that:

- Any incident reported is investigated and corrective measures must be applied.
- All incidents must be completed on the incident form and communicated back to the HSE department for further investigation.
- Ensure that all staff /contractors/visitors understand the incident reporting process and the protocols of what must be done, in the event of an incident arising.
- Assist and Participate in all incident investigation so as to determine root causes where necessary control measures can be applied.
- Immediately notify HSE department when serious/hazardous incidents arises, that impacts on the following:
 - Affects the health and safety of staff negatively
 - Affects the environment through major spillages, where it enters a water system or the land/ground.
 - Damages property or interrupts business operations.
- Ensure immediate (corrective actions) and long-term (Preventive actions) are taken to prevent reoccurrence.

8.3.2. HSE Department

The HSE department shall ensure that the following are coordinated:

- Receive and investigate all incidents reported.
- Recommend and review all control measures instituted to determine its affectivity.
- Provide necessary training and awareness to staff and visitors where required on incident procedures.
- Liaise and coordinate with all authorities applicable during incidents or during its investigations e.g. (civil defence, Municipalities, zoning authorities etc).
- Coordinate and communicate with other departments when incidents arise such as (crisis management and or HR departments).
- Assist all functions within du, regarding the HSE requests.
- Provide measures where applicable to control and prevent incidents from arising.
- Archive all incident records/reports.

- Provide follow-up on all incident investigations to ensure corrective actions have been implemented and proper documentation of mitigation efforts have occurred.
- Audit the accident investigation process to ensure quality and compliance, and follow-up on corrective measures.

8.3.3. HR Department

Where an employee reports sick, or is absent from work with a medical certificate stating injuries was caused due to a work related incident, then it is the responsibility of HR to notify the employee's line manager or HSE Department for further investigations.

HR department is to coordinate with the relevant parties as and when required:

- Employees Family
- Medical institutions regarding medical insurance requirements/claims
- Labour department in accordance to Federal Law requirements

HR shall also ensure that all documents required from the medical institutions or practitioners are attained.

- ☐ Recording of all incident statistics.
- ☐ Mandating and approving all compensation claims where required.

8.3.4. Vendors/ Visitors

Where an incident may arise in conjunction with a visitor or contractor, it is the responsibility of that contractor or visitor to report it to the du employee (point of contact for the project or within the retail shops). The du employee will then record the incident and inform procurement department in charge of the investigation of contractors and suppliers. Vendors may complete their own incident reporting forms or processes, however are requested to submit their forms for du to also conduct their investigations as required.

Where incidents arise in terms of customers within a Retail environment, then it's the responsibility of the Retail staff to obtain all information on the incident form and communicate it back to the HSE department. The HSE department would then coordinate with the Retail customer Care departments for follow-ups.

8.3.5. Security

The security personnel onsite will assist during any:

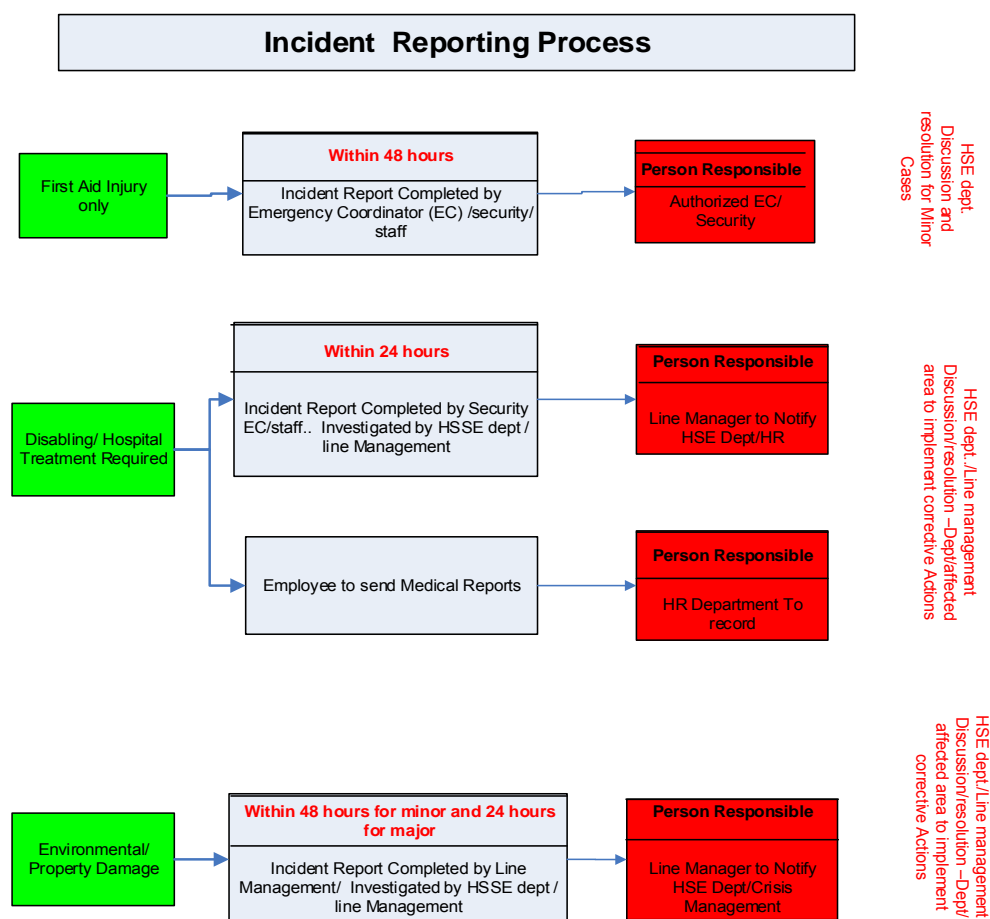
- Emergency situations,
- Incidents that may arise.

The applicable documentation (accident/incident forms) must be completed by security. Further assistance by security may be required during investigations.

8.4. Incident Reporting Timeframes

All incidents must be recorded immediately after treatment is provided and within the time lines of:

- First Aid Injuries – recorded not later than a 48 hour period on the incident form and to be submitted to the HSE Department.
- Disabling Injuries – Should be reported immediately to the HSE department after the incident has been controlled and recorded and investigated within a 24 hour period.
- Environmental Incident – Should be reported immediately after the incident is controlled and recorded and investigated within a 24 hour period for a major environmental incident with a high severity. For a minor controllable incident this must be recorded on the incident form within a 48 hour period.



8.5. Steps taken during an Incident

Immediate Steps

1. For all first aid related cases, please contact the Emergency coordinator on site. If an emergency coordinator is unavailable or cannot provide assistance then contact the ambulance services immediately on 999/998.
2. For all fire related incidents contact the civil defense on 997.
3. For any spillages that can impact the environment then immediate spillage containment must be used to control further contaminations.
4. Follow the emergency procedures for safe evacuation if necessary.
5. Call for assistance from security (8005150) and or other staff members.
6. Ensure that you control the hazard or risk that can worsen the situation.
7. Then notify the relevant parties of the incident immediately. Do not disturb or remove any items from the incident location unless it is worsening the situation.
8. Stop any work activity that could result in an incident arising.
9. Ensure that appropriate control measures are instituted to stop the incident or prevent it from worsening.
10. Reporting to AMC on 8003836 once the incident is controlled and managed.

Notification to the relevant line management and HSE department must be done accordingly.

8.6. Investigation Requirements/process

Conducting an investigation immediately after the incident will provide you enough details so as to determine root causes, for which adequate control measures can be applied.

1. Depending on the occurrence and type of incident, designated persons must conduct the necessary investigations to determine the root cause of the incidents. The HSE department and the line management, with other stakeholders may drive the investigation.
2. The investigation occurrence must determine:
 - What Happened
 - Why it happened
 - How it can be prevented from recurring
3. It is important to note that an investigation must be conducted as soon as possible so as to prevent any changes to the area/site. Any change may prevent that actually cause be identified. Therefore it

is recommended that an investigation be done within a 24 hour period or sooner after the incident occurred. Hence it is the responsibility of the person in charge or a du representative to record all details as far as possible so to establish the chain of events.

Initial steps of an investigation

- Secure the area if required to make it safer and or prevent any disturbance of the scene.
- Ensure proper notifications have been made and area supervisors and/or managers are aware of the situation. HSE department must be informed at this point so that assistance can be provided during the investigation.
- Complete the incident form (du-HSE-FOR-010) and send it to AMC@du.ae for further review by the HSE department.
- Prepare the necessary sketches and photographs so as to capture the actual events.
- Keep a time chronology of the incident and events leading to the incident?
- Conduct interview with people that were around the area- any witnesses.
- Interview those who were present before the accident and those who arrived at the site shortly after the accident.
- Keep accurate records of each interview.

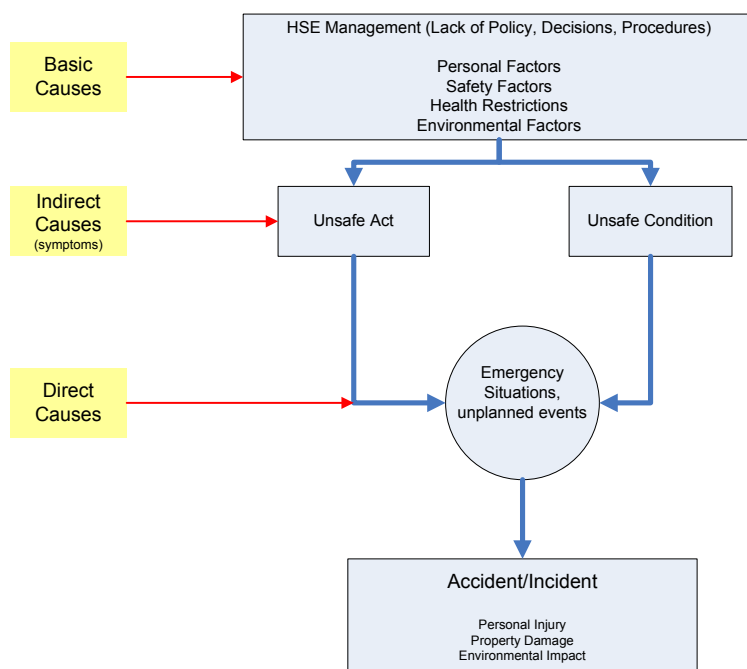
Determine Sequence of Events

The investigation shall ensure the following are determined:

- Determine who, what, where, when, how and why of the incident/accident occurred.
- What was not normal before the incident?
- Where the abnormality occurred?
- When it was first noted?
- How it occurred?
- Why did it occur?

Upon which an investigation report will be completed for all major incidents/accidents. For all minor controllable incidents this information will be completed on the incident form, with appropriate actions to be taken.

4. The diagram below illustrates three areas where root causes can be grouped. This can be used during the investigation process to determine the category of causes.



8.7. Incident Records

In most cases, the immediate area supervisor or manager will conduct the initial phase of an incident investigation. This initial activity is primarily a recording of facts involved in the incident/accident, list of affected employees and witnesses. This is completed on the incident form (du-HSE-FOR-010) and reported to AMC, in which it is recorded and tracked on Maximo. Direct supervisors are familiar with employee's work environment & assigned tasks. Supervisors must take the accident situation under control and immediately eliminate or control hazards to others.

All major incidents will be investigated, for which an investigation report will be produced that document the chain of events and root causes. Such report will be made available to all relevant parties to ensure control measures are applied and incident is monitored to prevent recurrence.

9. Emergency Response and Preparedness

9.1. Overview

All possible emergency situations / risks are considered in order to put plans in place to prevent the occurrence, as effectively as possible. Plans are also considered and implemented to address recurrence of emergency situations.

Any emergency situations that may exist due to accidents / incidents will follow the procedures and processes as documented in the du HSE plan for emergency preparedness and response (du-HSE-PRO-026).

Emergency situations may arise out of any abnormal situations, temporary activities or failure of systems/process and or equipment that results in an emergency and or incident.

Proactive planning such as ensuring risks are identified and controlled are aimed at reducing the potential occurrence of emergency situations. Further planning such as regular evacuation drills or other test scenarios/drills activities ensure the response and reaction during such emergencies. Drill schedules are either aligned and or communicated as applicable based on the test scenario. Drill scenarios may be randomly conducted so as to ensure the efficiency, preparedness and response that closely represents emergency situations where possible. Such schedules and records are available with the HSE department.

9.2. Types of Emergency Situations

The types of emergency situations, whether it is natural or man-made, will include the planning for but not limited to:

- Fires
- Medical situations
- Earthquakes
- Bomb threats
- Chemical Spill
- Any other threats which may result in an emergency

The following documents were developed and are available for reference in emergency / accident situations:

9.3. Roles and Responsibilities for Emergency Response and Preparedness

Specific Roles and Responsibilities are defined and assigned to identify staff members who will assist in the event of specific emergency / accidental situations. However the objective of emergency response is to ensure safety of life as its utmost and first priority, thereafter the protection of the environment and property. In the likely event of an environmental accident/emergency then protection of the environment becomes the first priority if no persons are directly involved.

9.3.1. Employees/ Line Management

It must be understood that under no circumstances are employees to be exposed to hazardous situations or dangers. Should any situation be a direct threat to the lives of employees, the emphasis must be personal safety first and foremost. It is also expected of employees not to be heroic but to always follow preventive measures in the event of an emergency. The most important issue in the event of an impending emergency must be to establish whether or not the incident can be reasonably managed and whether it can be prevented or minimized through careful planning and coordinated response time.

Therefore and employee/line management role is to ensure safety of its staff first prior to addressing the situation or applying control measures.

9.3.2. Emergency Coordinator (Building and Floor Emergency Coordinator)

The overall role of an emergency coordinator (EC) is voluntary and competent staff are identified to assist in the following areas:

- To ensure the safe evacuation of people. Direct staff to the nearest, safest exits.
- Assisting individuals in first Aid or medical treatment as required and trained to do so.
- Control and coordinate the situation so as to ensure no panic and the area to safe.
- Communicate to relevant parties during and emergency situation.

There shall be an emergency coordinator allocated per floor per building as far as reasonably practicable to assist in emergency situations.

It is the duty of an emergency coordinator to ensure that:

- He/She is trained to assist in an emergency

- Where changes arise such as locations then the HSE department are notified.
- Where an EC, does not want to continue his/her voluntary role that notification be made to the HSE department.

9.3.3. HSE Department

- Comprehensive emergency planning is to be carried by the HSE Department. Such plans are to be put in writing in the form of an emergency plan and are to be communicated and distributed to occupants and staff of the building.
- The emergency plan is to be reviewed and updated regularly, to maintain its efficiency and applicability.
- To ensure that all personnel are to be properly trained in the execution of their duties. The emergency plans are to be exercised on a regular basis.
- To ensure that emergency equipment (fire hose / firefighting equipment, first aid boxes etc.) are to be maintained and kept in good working order.
- To provide the necessary tools/ equipment that will ensure effective communication and identification of emergency teams (Reflector jackets, first aid boxes).

9.3.4. TSRM (Crisis management and Disaster Recovery) and HR

Where an emergency could result in the interruption of services and business then the applicable departments of du needs to be notified, for which a separate plan of action is considered.

All relevant departments will coordinate to ensure people safety and minimal interruptions of business operations. The business continuity processes that are aligned to the emergency plans may ensure safety of people and continuity of business operations.

9.3.5. Vendors/Suppliers

It is the responsibility of vendors to ensure they are aware of the emergency procedures of du and is applicable to the relevant premises. This information can be obtained from the HSE department and or du line management. It would be the responsibility of du line management to ensure that this is covered through contractor induction awareness.

The vendor shall ensure that an emergency plan/procedure is made available to du (HSE department) for the type of activity or service provided.

This shall ensure the minimum are covered:

- First Aiders and Fire Marshall (Name and Contact number on site)
- Evacuation procedures
- Spillage response and Control
- Emergency response plan

Where an emergency arises then the appropriate emergency plan shall be followed, for which the HSE department and du line management shall be immediately notified.

9.3.6. Security

The security personnel available on du premises shall be equipped with the knowledge of how to handle and assist during emergency situations.

The relevant security personnel shall be trained in the following:

- First Aid
- Fire Fighting

They shall be ultimately the primary responders to any emergency situations where possible, so that appropriate measures can be taken.

Their main responsibilities shall include the following:

- Initial response when notified of emergency situations
- Application of control measures as appropriate to the emergency.
- Communication and notification to relevant business personnel (HSE department etc).
- Traffic and crowd control within the premises and at the dedicated assembly points.
- Incident documentation
- On scene support as requested and/or deemed necessary

9.4. Asset Management Centre (AMC) and Security Command Centre (SCC)

The security command centre will act as a responder during emergency situations.

Where an emergency call is received at the SCC, then the appropriate operations staff will enact the appropriate emergency procedures such as:

- Classify the emergency
- Follow the emergency procedures applicable to the situation.

- Notification and communication to relevant parties internally (localized security, HSE department etc) and externally (Civil Defense, Ambulatory services)
- Record all incidents

The AMC is a support function to record all incidents on the Enterprise Asset Management platforms (maximo) where appropriate actions are then recorded and evaluated in terms of corrective/preventative actions.

9.5. Emergency Action Planning and Prevention

Proactive planning will ensure that the severity of an emergency is reduced or eliminated as far as possible. Therefore it is important that all individuals participate by ensuring the following are done:

- Ensuring all potential risks are identified and controlled.
- Regular inspections of premises to ensure emergency equipment and exits are free and unobstructed.
- Reporting of all incidents so that appropriate control measures can be applied.
- Stopping any vendor from carrying out hazardous activities in the absence of safety measures.
- The participation and training of employees/ contractors during evacuation drills.
- Testing and servicing of all equipment/procedures required during an emergency.

9.5.1. Evacuation Drills

Evacuation drills must be conducted at least once a year as a mandatory requirement. However it is recommended that drills occur once every six months to ensure the efficiency of the evacuation process.

The objective of the drills is to:

- Evaluate the effectiveness of procedures and test critical life systems.
- Ensure the quickest time frame in which people should exit the area.

The first priority is not to endanger any person's life; therefore the frequency of drills will provide a form of practice to identify deviations and or risks. These risks will be reviewed and controlled to ensure efficiency during an emergency.

Business functions that operates on a 24 hour basis or is a network critical operation should take into consideration planning

- To be conducted over a less busy time frame (e.g. Thursdays).
- In call centers consider practices such as routing of calls to another call center.

In these critical areas, all employees and or contractors must participate in at least one evacuation drill, to ensure the correct protocol during an emergency.

Other drill activities to test the response and actions of persons may also be carried out from time to time, such as medical drills, spillage response etc.

Where drill activities cannot be physically conducted then appropriate measures such as awareness sessions/walk through activities and or desktop analysis may be conducted to simulate the emergency action and responses.

9.5.2. Emergency Telephone Numbers

The mandatory telephone numbers for which all individual shall be aware off are as follows:

- POLICE – **999**
- AMBULANCE – **998**
- CIVIL DEFENCE AUTHORITY – **997**

Emergency coordinators that are available for the building shall be posted up within the premises. The security personnel available on site will keep an updated copy at the security desk.

9.5.3. Emergency Procedures

Emergency procedures have been developed to assist the business in the reaction of the following situations: du-HSE-PRO-026

- Fire
- Medical situations/casualties
- Bomb threat
- Earthquake/Tremors
- Environmental Spillages (*du-HSE-INS-003*)
- Evacuation procedures for:
 - Disabled persons
 - Staff evacuation (*du-HSE-PRO-035*)
- Evacuation Drill Procedures (*du-HSE-PRO-034*, *du-HSE-FOR-050* & *du-HSE-FOR-046*)

Documents developed by other internal departments, shall be instituted and implemented in accordance to emergency actions deemed necessary by such departments. (Crisis management/ Disaster Recovery)

9.5.4. Evacuation Assembly Areas

Evacuation assembly areas have been pre-determined by the HSE Department where applicable.

Where this is not available, then it is the responsibility of line management to determine the buildings/or landlord designation of an assembly area. Staff/visitors shall be made known of the assembly areas and guided to this area during an evacuation.

The assembly areas should be included on any evacuation map of the facility/premises and posted up at appropriate location for information purposes.

9.5.5. Emergency Evacuation Maps

Emergency Evacuation Maps shall be provided at each location so as to provide information to staff/visitors on the safest exit route during an emergency evacuation.

Where this is not available then it is the responsibility of du line management to ensure that the following is undertaken:

- Obtain a copy from the building management
- Notify HSE department
- Familiarize oneself with the evacuation maps available on site (e.g. Retail shops in malls).

Where Evacuation maps are developed by the HSE department then they shall contain the following information as a minimum:

The floor layout depicting

- Lobby areas (lifts)
- Fire Exit Staircases
- Escape routes (Using directional green arrows).
- Fire Emergency Equipment (Fire Extinguishers, Fire Hose Cabinet)
- Assembly Points
- Direction by placing a "You are here sign"

Evacuation maps shall be located in a conspicuous place so as to inform individual of the emergency routes and actions that need to be taken. Preferable locations are as follows:

- Placed adjacent to fire exit doorways.
- Within Lobby areas (lifts)

- Allocated at strategic points on each floor area.

9.5.6. Emergency Trainings

Emergency trainings shall be provided to ensure the knowledge is shared with the relevant persons that are required to respond to an emergency situation:

The required roles of training shall be as follows:

Emergency Coordinators shall undergo the following trainings:

- First Aid
- Fire Prevention and Awareness
- Defibrillator trainings

In-house trainings/ briefing sessions will be conducted and mandated through the HSE and HR departments accordingly so as to inform staff of the emergency procedures.

Security personnel shall also be equipped with the emergency actions and procedures that need to be addressed for each site.

10. Communication and Awareness

10.1. Overview

Communication, participation and consulting on Health, Safety and Environment matters are vital elements to implement and maintain the HSE management system, where it should be defined as follows:

- An internal communication among the various levels and functions of the organization. This concerns all du employees, current and new employees, all du contractors and visitors that have access to the workplace.
- An external communication: the company has to respond to any relevant external concern from its interested parties regarding its HSE impacts or external requests. On the other hand, the company is free to communicate on its HSE aspects and/or risks, its HSE performance and other relevant matters that may be of interest to certain stakeholders.

HSE management system documents and processes must be communicated to all relevant stakeholders where requested. Such documents or communication shall be distributed through hard copies and /or – soft copies (electronic means).

For more detail refer to the HSE Communication, Participation and Consultation Procedure, document number: du-HSE-PRO-004 to identify the various ways of communication and responsibilities.

Documents being communicated shall only be approved versions and comply with the various document control procedures (refer to section 10 for Document Control).

The HSE department has a dedicated site in the internal du intranet for which all documents can be accessed, for review, reference and implementation. This can be viewed and accessed by all staff as required. Interested parties may request access of du HSE systems for which the request will be reviewed and information provided accordingly.

There are no predefined schedule nor program of what communication and when it will be sent based on the HSE systems. However as the need arises and based on the request for information, communication is then tailored to address these requirements.

10.2. Responsibilities for Communication

10.2.1. Employees/ Line Managers

It is the responsibility of employees to ensure all communication sent out are read and adhered to where applicable.

Line management may communicate relevant HSE information through meetings and or via the du email platforms. Where HSE messages/information needs to be distributed internally to mass groups then it is recommended that such contents be reviewed and approved by the HSE department prior to Brand and communication processes.

10.2.2. Brand and Communications / HR Departments

Brand and Communications department will oversee that the respective communication is channeled through the right communication means and ensure its governance on the message being broadcasted. It will ensure its tone of voice and formatting is in order prior to distributions (internally/externally).

Messages involving employees and or affecting employees policies and procedures shall be mandated through HR.

Requests received from interested parties (External stakeholders) shall be communicated and provided through our Brand and Communications departments. Where there is a direct request for information that is business related then access shall be provided as required and approved by management.

10.2.3. HSE Department

The HSE department will ensure adequate and appropriate communication regarding Health, Safety and Environment is communicated within the business.

They will assist the business in drafting any HSE related messages where required, either for internal or external purposes.

10.2.4. Vendors/Suppliers

Contractors that are based on du premises will follow the policies and procedures described above. Vendors supplying a service to du must be communicated through the Supply Chain Process. Vendors requesting information regarding HSE shall request this via the Supply Chain department

Communication may entail but not limited to:

- du's HSE Policy
- Contractor/ Supplier requirements (du-HSE-PRO-012)
- Accidents/Incidents reports
- Risks and Hazards that may affect contractors
- Emergency information

Where audits and or inspections need to be conducted with Vendors/suppliers then formal notifications via emails to the vendors (Supply chain and or HSE department directly) shall be communicated.

10.3. Internal and External Communications

Although the HSE Department initiates and drives HSE communication, the Corporate Communications department forms an integral part of the success in communicating the HSE messages and information internally and externally.

Internal communication provided by HSE department must focus on:

- HSE policy and through the policy the company commitment to improve on HSE performance.

- All hazards and risks in regarding Health & Safety and Environmental Aspects or impacts which can affect each employee, contractor, visitor or the environment.
- All documents which constitute the HSE system where it must be applied by the employees and affected parties.
- General HSE knowledge and information for the purpose of informing and enhancing awareness amongst employees.
- The reporting of an incident/accident
- Emergency procedures and awareness.
- Compliance obligations and adherence

Each department, may communicate through meetings, informal discussions etc. However where there is formal communication that must be sent out to other business functions or all employees this communication must be reviewed by the HSE departments. Upon which mass distributions of messages will be guided by Corporate Communications.

Any matter concerning HSE requests, suggestions or escalations must be discussed and reported internally to the line manager of the department. This can be further sent to the HSE Department via amc@du.ae for resolution.

External communication

External communication shall include any verbal and or written request from external parties (Interested parties) such as:

- Government Authorities
- Compliance Obligations and adherence
- Local residents
- Vendors/Partners to du
- Neighboring establishments
- Other interested parties

Where HSE information is requested from such parties, then the HSE department shall be notified and provide assistance where required.

External communication provided by HSE department generally shall encompass the following:

- HSE policy and through the policy the company position and engagement to improve HSE domains
- All hazards and risks in safety and environment which can affect community and public

- General information on du performance and initiatives taken for HSE.
- Incidents that affect the public.
- Compliance obligations and its adherence

Any external communication affecting the public and or mass broadcast to the public domain shall be mandated by corporate communication department via:

- **Media and advertisement team**
The company is often presented and promoted by television, newspaper and radio channels.
- **Sponsorship and events**
du is also associated in different events, where HSE can be the focal point or theme of an event.
- **Market communication**
This forms pamphlets and brochures targeting campaigns and sales.

10.4. Types of communication

The various forms of communication may be done through the methods described below.

10.4.1. Printed communication

Press releases, safety and environment articles

These are drafted as a form of written communication that will provide factual information on health, safety and environmental hazards/risks/aspects. They may include case histories of actual events and can serve as a platform for emphasizing particular safety points. This is then distributed widely via email communication and placed on notice boards where reasonably practicable. Copies of press releases from publications can be shared internally to create awareness. This will share the information with the internal employees on what is being conveyed to the external public and make them aware of any announcements, issues on HSE matters.

du Policies and Procedures

Documents produced regarding HSE shall be made available to all employees and interested parties upon request. Such documents shall be available on the du intranet site for accessibility. These documents shall highlight du's HSE management systems and processes.

Posters

Posters aim to provide a constant awareness and impact regarding HSE. This will promote employee and or contractor adherence to HSE requirements.

Films/Videos and slides

These are useful in training programs, but they can be included in more formal communication sessions as a basis for discussion and or ensuring awareness is communicated.

10.4.2. Verbal Communication

Conferences, workshop, seminar/Training

Through planned events hosted, externally through other service providers or internally through the HSE department that focuses on health, safety and environmental components.

This is an opportunity to collect information and share issues with different companies; it's also an opportunity to collect information on new technical solutions.

Face to Face Discussions/Meetings

Meetings form the biggest platform of communication within du, where information is passed through to relevant persons. It provides an immediate communication to employees, through departmental meetings or external meetings, where HSE concerns will be raised and discussed.

10.4.3. Electronic communication

Mass communications / e-mail- (internal.communications@du.ae or HR4U@du.ae)

Mass communications are to provide information and awareness to staff. Emails sent from person to person will play the most frequent method of communications.

Use of social media platforms, are used to also spread awareness and communication.

Intranet and specific web site

The intranet shall provide a platform to inform and create awareness on the progress within the HSE fields, special events or campaign organized around HSE subjects. It will also provide a portal for accessibility of information regarding the HSE system.

10.5. Participation and Consultation

Participation and Consultation begins with the involvement of du staff members through:

- Aiding in identifying hazards and risks within the work environment and reporting it to line management for the recording and rectification aimed to ensure a continual improvement cycle.
- The various appointed roles and responsibilities as defined under the governance structures for,
 - Emergency Coordinators
 - Appointed Personnel's.
- Participation of individuals during events/ workshops and trainings.

Consultation with relevant departments is conducted through the department meetings and / or specifically the HSE Department.

The aim of awareness and consultation/participation of various staff/functional areas is to ensure the following are communicated and addressed:

- Awareness on its HSE management system changes, such policies, procedures, risks/impacts etc.
- Areas of non-conformance that results in lack of control or risks/impacts.
- Compliance obligations that need to be adhered to.
- The various departments contribution to initiatives, programs and achievements on HSE Performance
- General feedback on HSE progress and reporting performance.
- Suggestions, ideas on HSE initiatives and programs to promote sustainable practices.

11. Document Control and Records

11.1. Overview

The HSE management system is centered on document establishment and revisions so as to ensure all those affected by the HSE System are aware of any changes and or updates that may arise. HSE documents and records are important in that they provide evidence of past performance and allow du to demonstrate its compliance/conformance to applicable requirements set by regulations and or du processes and policies.

All HSE documentation must adhere and comply to the du Documentation Procedure, document number: du-HSE-PRO-023 to ensure a standardized document quality. Documents are archived as per the du document control processes mandated by the HSE Department.

The document system comprises of all policies, procedures, forms, work instruction and reports that are compiled within the HSE management system. These documents will be controlled by the HSE Department with respect to:

- Communication, distribution and implementation to internal staff members and other interested parties;
- The Archival process and
- Audits to be conducted to ensure applicable revision updates / changes that need to be affected on current documents.

11.2. Control of Documents/Records

The du Document Control Procedure (document number: du-HSE-PRO-023) outlines the control of all HSE documents from its development to its revision or obsolete stages. The documents are controlled under the principles of:

- Standardization (Formatting and rules of structure within the document);

- Document Tracking (System that easily identify HSE documentation through a document control numbering system);
- Approval processes for certain documents produced (e.g. All policies produced require top management approval);
- Rules of updating, which specify how revision or change management must be followed. (The author must review changes and finally be approved by the HSE Department). Through its annual revision process, documents are viewed with its intention of applicability. Obsolete, documents are to be destroyed accordingly and
- Communication of documents produced – This follows the archival process of documents were documents are stored on a web access for frequent retrieval by its employees. All documents produced that affects business functions or specific roles and responsibility must be communicated via the committees or through the communication platforms.

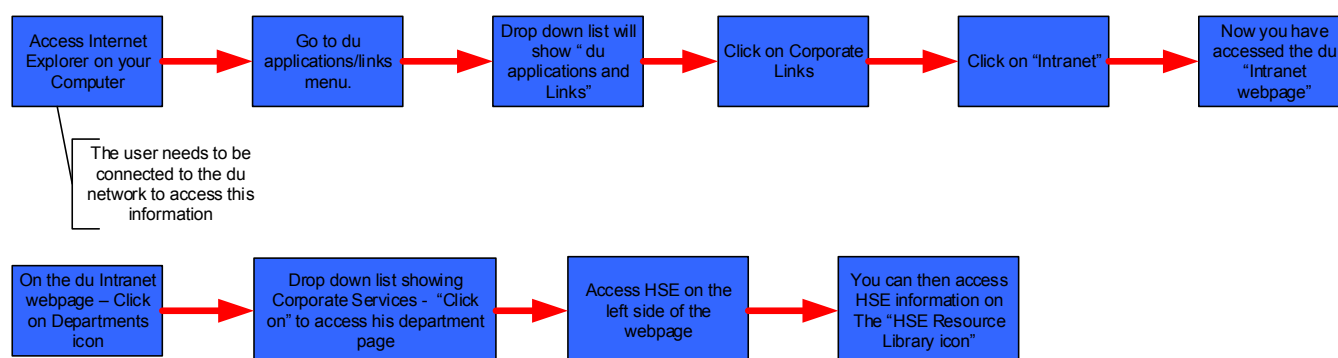


Figure 7 - The following diagram illustrates the Web access retrieval of du HSE documentation.

11.3. Responsibilities for Document/Record Control

11.3.1. HSE department

The HSE department's mandate is to set policy, ensure HSE planning through procedures and processes that provide guidance to other business units and therefore these documents produced under its governance will be controlled. This responsibility includes the development, maintenance, review; evaluation and archiving of all centrally produced HSE documents/records.

11.3.2. Employees/Line Functions

Employees/line functions are to ensure that any document (s) retrieved and or used shall be the most updated and relevant revisions. All updated documents revisions will be posted in the du intranet for easy

accessibility for staff members. The various business functions/ employees will assist in identifying documents through its implementation that may become obsolete or require revisions due to changes that may arise. Upon which, notification to the HSE department shall be made so that appropriate rectification, management or the further need of documentation takes place.

11.3.3. Vendors

Documents requested by vendors and or suppliers shall ensure that they are issued the most relevant/updated revisions. Where vendors request HSE documents then a formal written request must be made to the Supply chain departments for which such documents will be issued after review. Documents being issued to/by vendors shall follow the guidelines as external documents.

11.4. Types of Documents

Documents are developed based on business need through:

- Hazard/Aspect identified, that requires a step by step procedure to reduce risks.
- A HSE management requirement that is instrumental in providing guidance and structure for HSE implementation.
- To record findings or evidence of HSE performance.
- Providing information to the user on specific processes or procedure that need to be followed.
- Fulfillment of its compliance obligations where evidence needs to be demonstrated.

These documents are established by The HSE Department with its intention of either being one of the described documents below:

Policy	PO	A policy is a deliberate plan of action to guide decisions and achieve rational outcome(s).
Manual	MAN	A document specifying the HSE management system of an organization.
Strategy	STR	A Strategy is a long term plan of action designed to achieve a particular goal
Guideline	GD	A procedural method intended to help individuals to meet the requirements of the evaluation standards.
Procedure	PRO	Step-by-step instructions on how to perform a task based on technical and theoretical knowledge
Work Instruction	INS	Work instructions provide a detailed breakdown of instructions required to carry out one or more steps or tasks in a procedure.

Forms	FOR	Forms are pages comprised of text and “fields” for a user to fill in with information.
Report	REP	Formal account of current events, situations or recordings within a document.
Records	REC	A record is a document that contains objective evidence which shows how well activities are being performed or what kind of results are being achieved.

11.5. Document/Record Change and Approval Process

Applicable approvals must be obtained based on the type of documents produced and will follow this hierarchy for approvals.

Approval Structure for HSE Documents				
Document Class	Board of Directors/ Executive Committee	CEO	Executive or Senior Management (Chief, SVP, EVP, VP approval)	Author / HSE Department
Strategy			X	
Company Policy/ Objectives and Targets		X		
Policies			X	X
Procedures				X
Guideline				X
Standards				X
Work Instructions				X
Forms				X
Process Flows				X
Records				X
All operation documents for HSE				X

Where documents are designed/ drafted by the HSE Department, the applicable author of the document may consult and attain the required approvals based on the content of the document/record. This must be done through consultations and discussions until agreements are reached by the various affected departments or business governance committees. The approval process will also be applicable to documents that are drafted by other departments and seek HSE approvals. Refer to the approval page required for documents du-HSE-FOR-043.

The following is an extract of the approval table:

Refer to form du-HSE-FOR-043

VERIFIED AND APPROVED BY			
Business Unit	Name/Position	Authorized by (Signature)	Date

On final approvals all applicable department heads may sign and/ or stamp each page. Where documents are physical stamped (e.g. legal documents) or signed, then these copies will be archived and scanned (pdf. Format) for the electronic distribution.

Changes to documentation under the HSE management system may occur from time to time and form part of a continual improvement cycle. Through this activity the author of the documentation is made aware of the changes and as required discussions and agreements are drafted which then goes through the approval cycle process. Once documents are changed then the version control process is applied as defined in du-HSE-PRO-023.

11.6. Internal and External Documents/Records

Internal Documents:

All internal HSE documents shall be made available on the du intranet site, or a request can be submitted to the HSE department for any particular document.

Internal documents/records shall follow specific document policies as defined under du-HSE-PRO-023.

External Documents

External documents may be referenced as follows:

Any documents/records produced outside of the HSE department and do not form part of the HSE management system shall include the following but not limited to:

- Other internal departments of du.
- Government Authorities, local compliance requirements, Landlord requirements/agreements
- Document/Records of Vendors/Suppliers
- Documents/Records produced by visitors (public, customers)
- Document/records from monitoring and measurement activities

Documents/records obtained from external parties shall be recorded and archived as per the HSE management system and or with the respective business functional areas. Such documents may be

referenced and applied where applicable in conjunction with du's policies and procedures. All external documents affecting the HSE systems shall be notified and archived with the HSE departments.

External documents as defined within this procedure will follow the document procedure control for archiving; however will not be considered for review and change management. Regular review of revisions control, (as done with other HSE documents) will be verified with the original source of these documents to ensure updated revisions are used and stored within the HSE system. It is the responsibility of the HSE Department to verify with the original source to attain updated revisions.

All external documents are linked under the External Documents folder within the HSE management systems.

11.7. Archiving and Distribution of Documents/Records

Archival of documents/records – The process of archival is twofold:

- Electronically stored documents (Intranet/P:drive; Maximo) and
- Hard copies filed in HSE Departments' filing systems.

If required, archived hard copies must be requested and released (approved) by the HSE Department under certain protocol described in the du Documentation Procedure, document number: du-HSE-PRO-023.

Only PDF versions of documents/records shall be distributed internally and externally as required. Where requested by individuals in writing, other formats may be distributed for which will be uncontrolled. All documents/records are copyright restricted and are confidential to du.

No documents/records may be issued to external parties without prior approval of line management and the HSE Department, where applicable.

Documents/records that are restricted or confidential will only be distributed to the requester upon approvals from the HSE Department and the senior manager of the affected business unit (VP, EVP).

All documentations within the HSE systems are archived on the P:Drive of du IT systems and are governed by du IT policies and processes for back up and security requirements. Access is provided to the various functional areas under the scope of corporate services to store its functional documentation and records as required. Security/Protection rights are based on each user administration for their functional area. However the HSE management system is fully available to its users via the intranet and P:Drive security rights.

11.8. Retention and Obsolete Documents

Retention Periods for all HSE documents are to be kept at a minimum of 3 years. i.e. where a document has not been changed for more than 3 years, a review of its content will establish the need and applicability of this document, before considered obsolete and destroyed.

All documents that are considered obsolete shall be removed from the HSE system, for which an approval must be obtained (du-HSE-FOR-052).

12. Monitoring, Measurement and Checking of the HSE System

12.1. Overview

In order to ensure the effective implementation and functionality of the HSE management system, measuring and monitoring is required to provide feedback on the progress and current status on meeting its performance to its HSE policy and its Objectives and Targets.

Effective implementation of the HSE system requires du to evaluate / assess the effectiveness of its HSE system by reviewing:

- Its targets, objectives, achievements and HSE policy commitments;
- How corrective actions are implemented and if they are effective in reducing risks and
- Preventive planning done effectively to address potential risks and minimize occurrence.
- Measure its operational control through risk identification and risk control as per the Risk Register;
- Investigate and implement corrective actions to close off all non-conformances / audit findings;
- Record inspection deviations and implement corrective actions to close gaps and
- Tracking and recording of incidents, accidents emergencies and risks to proactively prevent occurrence and provide a measure of predictability to aid in proactive planning.
- Evaluation of Compliance Obligations
- Feedback from its Stakeholders/ Interested Parties through surveys, suggestions, complaints etc.

Procedures and other documents developed to guide the HSE system with respect to monitoring and measurement are:

- Monitoring and measurement procedure: du-HSE-PRO 022
- Monitoring and measurement table: du-HSE FOR 034

12.2. Monitoring and Measurement Methods

12.2.1. Qualitative Methods

Qualitative methods will also be ways of measuring HSE performance. This will be done through:

- *Observations*: A direct observation of conditions, work methods used and individual's behaviors.
- *Talking to people*: this will elicit facts, advice and will gauge individual's views and opinions.
- *Examining written reports*: viewing reports for correctness and identifying immediate errors/deviations that are rectified. All of these qualitative methods will be used on a daily basis and forms part of HSE measuring. These methods are generally not always recorded as proof of actual measuring and monitoring.

12.2.2. Quantitative Methods

Quantitative methods used will form part of actual measurements taken with respect to:

Environment:

- Energy and water consumptions will be measured as future endeavors, to establish the usage. This will ultimately be in lieu with optimizing based on usage in support of environmental performance.
- Consumptions of Raw materials (paper, and all consumables) will form part of the quantities used, with the endeavor of reducing, recycling initiatives.

Health and Safety:

- Noise measurements will be conducted in areas where noise creates and annoyance and or a health impact e.g. (construction work, contact centers, generator operations).
- Air quality measurements will be conducted within office environments to ensure a health, safe workplace. This specifically will measure temperature levels, Carbon Dioxide levels, and volatile organic compounds).
- Lighting measurements that form part of glare or lack of viewing ability, and will form part of ensuring a conducive working environment.
- Other measurements that form part of quantitative methods may include,
 - Technical measurements where applicable (electrical testing, gas testing),
 - Safety testing (food hygiene swab analysis tests, water testing)

12.2.3. Measuring and monitoring Health, Safety and Environmental performance

More especially monitoring and measuring Health, Safety and Environmental performance consists of but not limited to:

- Tracking and monitoring of incidents and accidents statistics/records.
- Quantitative measurements conducted for occupational hygiene related measurements, surveys (measurement of noise, air quality, and lighting).
- HSE Trainings
- Evacuation drills
- Vendor compliances performance
- HSE inspections
- Sustainability Data (Energy, water, CO2, IAQ, waste, Consumables)

More especially monitoring and measuring environmental performance consists in:

- Monitoring emissions and discharges to meet applicable compliance obligations or other requirements to which the organization subscribes.
- Monitoring consumption of water, energy, raw materials to meet objectives of reduction or optimization
- Providing data to evaluate the organization's environmental performance (monitoring and measuring by efficient indicators

Data capturing and testing provides information to the effectiveness of the HSE management system and allows for continual improvements to be identified and addressed accordingly. Data capturing and or Testing shall be done as a minimum once per year for the above parameters.

Deviations arising out of the Monitoring and measurement process then leads into the following processes such as nonconformance's, process change management, risk/impact identification and control and or the corrective action cycles

12.2.4. Equipment Control and Calibration Requirements

All measurements conducted where mechanical monitoring devices are used for testing, then the following requirements must be met:

1. All equipment is to be calibrated to known approved standards.

2. Calibration certificates shall be made available for all equipment.

Reports with results either internally or by external vendors shall be made available for measurement and testing.

Where measurement and testing is done to test the levels of hazards prior to entering any site/area, then these need to be documented on site reports or work permits.

Individuals are not to enter any site where conditions are hazardous.

12.3. Responsibilities for Communication

12.3.1. Employees/ Line Managers

All Line management functions play a vital role in ensuring the tracking and monitoring of HSE within their business functions. Their responsibility lies with ensuring:

1. Achieving HSE Objectives and Targets.
2. Identifying and controlling risks. This specifically is registered on the HSE risk analysis matrix form to enable the monitoring of risks identified.
3. The closure or rectification of all non-conformity, corrective and preventive action that is registered.
4. That appropriate testing, calibration and certification is conducted on such measuring equipment regularly. Keeping on record all test and calibration certificates for inspection and audits.
5. The reporting of workplace injuries and accidents so that these can be measured by the appointed representatives and/or HR departments.

12.3.2. HSE Department

- Initiating of HSE audits to verify system implementation. (This will include external/internal audits, nonconformance procedure and management review process).
- Issuing Non –conformance for deviations that may arise, for which rectification is required.
- Random inspections within business areas, processes and procedures to determine HSE performance. This could also entail visual inspections or observations done on work methods/tasks to highlight deviations and that are later recorded.
- Random inspections/audits will be conducted on contractor's and vendors to ensure compliance with du HSE requirements.
- Assisting the business in its annual reporting on HSE performance through two means:
 - Annual HSE performance reports – which will constitute the “du sustainable reporting”

- Through its Governance reporting to the Executive committees that will in turn report to a board of director level on progress.

12.3.3. Other Internal du Departments

The HR department is closely linked to effective measuring and monitoring of workplace related incidents and injuries. This will be recorded and monitored through sick leave taken as a result of an injury arising out of or in connection with a work activity. It is the duty of the HR department to record such statistics, which will be communicated to the HSE department as part of discussions for corrective/Preventive action.

Supply Chain Management will specifically measure vendors, suppliers and contractors that assist du in its implementation of services and or activities. This will be aligned to measuring compliance to du's HSE requirements. Supply Chain Management will also assist line management in attaining vendors for the calibration, testing and certification of equipment and/or vendors are requested to produce any testing/calibration certificates for services provided.

12.3.4. Vendors/Suppliers

Vendors and suppliers will assist du in various ways for which the various services can be offered:

- Use of vendors in tracking and monitoring consumption data where required.
- Use of vendors to conduct inspections on sites (Risk assessments).
- Use of vendors to conduct audits on the HSE systems
- Use of vendors to conduct measurements (Quantitative)

Where vendors are used for a specific task or service then recording into the HSE system will determine its progress, and affectivity.

Only reputable, approved vendors shall be considered for HSE services.

12.4. Non- conformity Process

Compliance and conformance to the HSE management system are monitored and non-conformities registered for those requirements that are not met or where gaps exist. Corrective actions must be implemented to address these and ensure compliance and conformance.

Deviations from OHSAS 18001, ISO 14001, Legal and other applicable HSE requirements are determined through:

- Regular inspection and the Measurement System (measuring and monitoring);
- Testing of HSE parameters as required.;
- Maintenance and updating of the HSE risk register;

- Customer (Internal and External) Complaints Registrations and the corrective process of these;
- Compliance obligation audits;
- Other HSE system and documentation audits and
- Management reviews

All non-conformities are registered for tracking purposes and communicated to the various departments / functions / units via emails / hard copies where the corrective and Preventive plans of action are to be determined and implemented. Refer to the following documents developed to guide actions in this regard:

- *Non conformity preventive and corrective action: du-HSE-PRO-021*
- *Non conformity treatment table: du-HSE-FOR- 017*

How to Investigate

- Depending of the case, the Investigation will be conducted as a result of the deviations identified. This will either be done by the appointed HSE personnel, line management or the HSE department. Security personnel on site will assist where necessary on all investigations. Through these investigations, specific root causes are established, which are then identified as non-conformities to the system and/or process of implementation.

How to record

- Tracking of non-conformances will be located on a consolidated register reflecting all non-conformances that are outstanding and/or completed with corrective/Preventive actions.
- A legal non-conformity will also be recorded against the risk matrix. The risk will be evaluated under the risk register and prioritized based on its evaluation, and then recommended control measures applied as corrective and/or Preventive actions. On the closure of the risk, the non conformance then is closed out. This is evaluated by the HSE department to ensure effective control before approved.
- The HSE department will review all non-conformances regularly to establish any trends or common causes that may be presented.

How to treat

- By corrective and Preventive Action:

Corrective action can be taken directly by the line manager in case of emergency. The action is then recorded in the action program.

- Preventive actions may include:

Preventive actions aim at preventing the situation/deviation from arising again. Such measures may include any changes in procedures or operations.

12.5. Internal Audits

Internal and external audits are conducted as per audit schedule available in the HSE Department. Internal audits are conducted to assess compliance of the HSE management system against legal -, *OHSAS 18001* -, *ISO 14001* and HSE system specific requirements. Audit findings are used as input during the management reviews that are held at least once a year. Internal audits are conducted by the HSE Departments with assistance from applicable departments / functions / units.

As per the Internal Audit Procedure (document number: du-HSE-PRO-024) audits will focus on compliance to requirements as specified above taking the following in consideration:

- Conformance and applicability of documentation designed for the HSE system;
- Compliance to the Legal Requirements;
- Identification of deviations from requirements, Objectives and Targets and
- Reporting on findings / gaps to be addressed.

HSE Internal audits shall be conducted on planned schedules to determine the effectivity of the HSE implementation within the organization. The scope of the internal audit must be clearly identified and documented in the audit plan established and validated by the audit team before proceeding.

An audit must take into account the previous audit and follow up the weak and good points identified at this time.

12.6. External Audits

External audits are conducted by contracted external companies to objectively review the HSE systems and it's affectivity of implementation. This is mandated based on the pre-defined requirements from the respective certification bodies. Audit criteria are predefined by the auditor/ auditing company and are discussed and agreed upon by with the HSE departments.

12.7. Management Reviews

A management review ensures the analysis of the system in identifying deviations, to ensure continuous improvements and areas of excellence. It will ultimately provide a vehicle for making changes to the HSE systems so that goals of meeting its commitments (HSE Policy) are achieved.

The review will be conducted on an annual basis by the senior management of corporate services, in accordance with the Management Review Procedure (document number: du-HSE-PRO-025)

During management reviews the need for changes will be identified and its implications discussed. Changes could affect the system as follows but not limited to:

- Updated revisions of du's HSE policy;
- Updated revisions of Objectives and Targets and
- Updated revisions of the Risk Register.

13. General Health, Safety and Environmental Requirements

13.1. Ergonomics

Ergonomics means fitting the workplace to the worker by modifying or redesigning the job, workstation, tool or environment.

du shall maintain and implement an ergonomics program that identifies, prevents, and controls ergonomic hazards in accordance with its applicable rules and regulations. Ergonomic related incidents shall consist of health and risk factor surveillance, work-site evaluations and improvements, medical management, training, and program review and evaluation.

The objectives of ergonomic evaluations are to reduce the risk factors that lead to cumulative trauma disorders and other related injuries and diseases. This will be done by effectively implementing engineering control measures where practicable and focus specifically on administrative controls that would include knowledge and training aspects.

Refer to AMCA-FSO-POL-007 to review the process of an ergonomic investigation.

13.2. Manual Handling and Lifting

All employees engaged in handling materials of any type shall have been instructed by their managers in the proper method of lifting and body mechanics. Employees shall only lift objects in the approved manner.

- Before lifting size up the load. If the load is too heavy or bulky, get help.
- Learn to lift properly:
 - Get a firm grip and footing
 - Bend your knees

- Tighten stomach muscles
 - Grasp the load close
 - Keep your back straight
 - Lift with your leg muscles
- Fingers and toes should be in the clear before setting down any materials or equipment.
 - Lifting or lowering operations being performed by several persons shall be done on signal from only one person and only after everyone's feet and hands are in the clear.
 - When possible, a hand truck, forklift or hoist should be used to lift heavy or bulky objects. Stand clear of all suspended or overhanging loads.
 - Material must be loaded on hand and motor trucks in a safe manner so it will not fall off in transit. If necessary, lash load to truck.
 - Wheelbarrows, hand trucks and other similar devices shall not be over loaded, or unbalanced, so they can be easily handled.
 - Forklifts or hoisting mechanisms shall be labeled indicating the maximum load limit in pounds. No person shall lift a load exceeding the limit.
 - Materials shall be stored or placed in authorized areas.
 - All stacked materials, cargo, etc. shall be arranged in an orderly manner for convenient and safe handling.
 - Defective or broken strapping on cargo shall be removed, repaired or replaced before handling. Material shall be examined for sharp edges, protrusions, signs of weakness or other factors likely to cause injury to a person handling the object. Defects should be rendered harmless before proceeding.
 - Material should not be thrown from elevated places to the floor or ground. Suitable lowering equipment should be used for this purpose.
 - Neckties, finger rings and loose clothing should not be worn by persons handling stores or material, or near any rotating machines or conveyers.
 - When removing bulk material from piles, never undercut the pile so you don't have to work under overhanging material.
 - Only authorized persons who have been properly trained are allowed to operate hoists and industrial trucks (forklifts).

- Use only approved chains, hooks, slings, ropes, and attachments for lifting operations and inspect those before using. Never load hoists, chains, slings, ropes, hooks or forklift attachments above their rated load limits.

13.3. Personal Protective Equipment (PPE)

All employees and contractors on du sites performing a service/task that requires the use of appropriate PPE shall ensure that this is available and worn at all times during the course of the task.

Such equipment must be appropriate to the risks identified as part of the project. All PPE shall be properly maintained and in good order.

All PPE issued must be recorded, and employees trained on how to use equipment effectively. This record should be kept as part of the project file onsite. Any defective PPE shall be replaced.

PPE include:

- Safety footwear
- Safety helmets
- Eye protection
- Other PPE – uniform, respirators, gloves etc.

13.4. Chemical Control

All chemicals on site must be managed:

- Chemicals shall be stored in designated areas only. Away from public accessibility.
- They should be labeled with adequate safety instructions on labels
- Material safety data sheets are to be available on site for each chemical.
- Staff/contractors handling such chemicals must be trained and use appropriate personal protective equipment.
- No hazardous chemicals will be kept within the retail outlets.

13.4.1. Selection of Chemicals

Any chemical selected shall comply with its chemical contents and safety features. Chemicals that are procured shall be considered as a priority for its environmental properties and less hazardous nature. Hazardous chemicals that can be substituted with a more environmentally friendly product shall be procured as a priority.

13.4.2. Storage, Usage, Control

All chemicals used and stored on site shall be labeled and located within designated areas. Material safety data sheets shall be accompanied with all chemicals kept on site.

Chemicals stored outside shall be reviewed for its Flash point properties prior to being stored outside.

Any chemical that spills shall follow the spillage control procedures highlighted in this document and review the contents of its material safety data sheets.

13.4.3. Hazardous Substances

Hazardous substances: *is any flammable liquid or any substance likely to give rise to toxic, corrosive or harmful risks.*

Any hazardous substance that is procured, used and or ready for disposal shall be immediately notified to the HSE department. Contractors must inform du of any material being brought onto site, which may be environmentally hazardous.

The following details must be made known about any hazardous substance:

- Description including: product name, use, quantity etc
- Material Safety Data Sheets
- A copy of risk assessment relating to its specific use
- Work procedures required for safe storage, use and disposal.
- Required permits of use, storage and disposal by the local Municipality.
- Information and training on the hazardous substances
- The nature and quantity of any environmental damaging material.
- The method of safe handling, so that any emissions to atmosphere or discharge to land or water are avoided.
- The nature and the level of any emissions to the atmosphere water or land likely to occur as a result of the work.
- Any potential risk to the environment or hazard to health, resulting from the work being undertaken.
- Method of removal of any unused environmentally hazardous materials from the site on completion of work.
- Method of disposal.

The contractor or employee shall maintain a register on site detailing the movements of environmentally hazardous materials including wastes.

Hazardous substances shall only be approved for use and storage upon written approvals from the HSE department and local authority.

- Substances shall be held in a secure place with clear identification.
- A drip tray must be placed for all hazardous liquid storage in order to prevent ground pollution by spillage.
- All containers holding hazardous substances shall be replaced as soon as they are not in use.
- It is responsibility of the Contractor to ensure that his/her employees are properly informed and trained on how to use and control hazardous substances.

13.5. Housekeeping

Good housekeeping ensures accidents are avoided. Therefore as part of health and safety responsibility, we encourage that every individual ensures items are stored away in designated locations.

1. Ensure there are no boxes stored under desks or in passage ways.
2. Ensure good storage principles are applied to cabinets/shelves etc.
 - Heavy items to be stored on middle to lower shelves.
 - Items should be stored neatly and labeled.
3. Lunch rooms, break rooms and/or restrooms must be kept clean.
4. Ensure that documents are filed, so that there is adequate space on desks.
5. Staff is to ensure work areas are kept neat and tidy.
6. Items when spilled shall be cleaned up immediately using the appropriate methods of spill control. Refer to the spillage control procedures for chemicals (du-HSE-INS-003).

13.6. Safety Signage

Safety signage's shall be applied to every du facility so as to provide awareness and knowledge to staff and visitors on site.

HSE signage's allocated to a site shall ensure the following requirements:

- Uniformity and conformance to legal requirements and or benchmarked guidelines.
- That they display the applicable meaning and knowledge to individual's onsite.

- That provides adequate warning and caution that needs to be taken prior to implementation of any activities and or entering a hazardous area.

Refer to the detailed procedures on the types and requirements of safety signage's du- HSE- PRO-007

13.7. Vendor Compliance

Any vendor and or contractor conducting work on du premises shall ensure they are registered via the Supply Chain Process. All vendors registered on du supply chain process must be evaluated in terms of their HSE compliance as a company, so as to ensure the services provided onsite are taken with the highest safety considerations (du-HSE-FOR-012).

All Health, Safety and Environmental procedures shall be complied with prior to purchasing of products and during the delivery of services on any du premises.

Products that are purchased shall ensure the following requirements as far as reasonably practicable (refer to du-HSE-FOR-008 that evaluates the environmental compliance of products purchased):

- That they comply with any hazardous substance parameters.
- du prefers to use less hazardous substances if available within the market.
- Products shall display either a percentage of recycled material and or completely recycled.
- The products shall have clear manufacture instructions and or specifications on how to use, install, maintain and dispose items.

The following du contractor guideline booklet must be adhered to when on site and while conducting any task/service- (du-HSE-PRO-012).

13.7.1. Management of Outsourced partners/Vendors

Outsourcing is a common practice to ensure service delivery. All outsourced partners/vendors are governed by du's Supply Chains policies and procedures.

Where vendors are used for activities within the scope of the HSE management system, then each functional area line management would ensure the overall governance of his/her vendors. Long term vendors that are based on du premises will undergo an HSE induction and submitted HSE plans and procedures are required based on the scope of services being delivered. From time to time, the HSE department shall conducted audits to ensure the HSE practices and compliance requirements are being

adhered to so as to limit potential risks, emergencies and accidents arising from such activities. Meetings are conducted by relevant business users regularly to monitor progress of vendors based on service delivery and as required HSE department may be involved to ensure consistency and adherence to HSE practices.

13.8. Work Permits and Authorization Forms

Any work carried out internally and or external on the du premises must comply with the appropriate work permits for that given task and or location. Types of permits that will be identified are as follows:

Internal permits:

- Confined space entry permit (du-HSE-PRO-010)
- Hot works permits
- Access and work Authorization permits (du procedures) – (du-HSE-FOR-014)

External permits

- Zoning Authority Permits (TECOM, local Municipalities, and Civil Authorities). Such permits must be applied for directly with the applicable authorities prior to any work conducted on du sites.

13.9. Electrical Safety

It is important that electrical hazards and risks are identified prior to any tasks. Only authorized and qualified electricians shall be permitted to repair or work on electrical equipment. All electrical installations shall comply with the du-HSE-INS-008 document.

The following Requirements shall be followed:

- Contractors shall not interfere with or work on any of du electrical installations prior to approval from du Representative.
- Appropriate Lock out systems must be applied for any electrical work carried out. Refer to du-HSE-INS-007)
- No temporary electrical supply shall be installed without the approval from du Representative.
- All temporary cables shall be above ground, where possible.
- All cables shall be in good conditions and any joints to be made with proprietary joint system.
- All electrical work completed must be subjected to an earth leakage test to ensure its safety.

13.10. Working at Heights

Any person working at heights shall ensure that the appropriate risks are identified prior to the start of operations. Where safety equipment is required, then it is the individual's responsibility to ensure he obtains the correct safety equipment and is trained on how to use them.

Any work, which results in openings being created where persons can fall through, or removal of side walling or barriers where persons can fall from, must be effectively protected to prevent injury.

The following requirements shall be adhered to as a minimum:

- There must be a fall protection plan for any work conducted at heights.
- Materials, equipment or plant shall be properly secured to prevent them falling from a height. Where there is a danger of falling material, effective steps i.e. solid barriers and warning notices must be taken to prevent such danger and to warn people about the hazard.
- Contractors must use crawling boards and edge protection, when working on fragile and other roofs, where personnel can fall through or from the roof.
- Where it is practicable to provide standard working platform and the working height exceeds 2 meters, safety harnesses must be worn. When working on open steel or erecting / dismantling cantilever or hanging scaffolding a securely attached safety harness and where required inertia reel must be worn.
- Safety harnesses must meet the approved EN 361 or equivalent standard, and be properly maintained and regularly inspected at monthly intervals. The contractor shall keep a record of such inspection.
- Where a safety harness is not adequate, the Contractor shall supply an inertia reel. In addition to the normal monthly checks carried out by the Contractor, six monthly examinations of inertia reels shall be carried out by a du approved independent certification examiner.
- Contractor employees shall not move a distance of more than 3 meters (10 feet) horizontally away from the inertia Reel secure anchorage point.

Full Body Harness (i.e. with Chest and Leg Straps) will only be permitted. Safety belts shall not be accepted.

13.10.1. Ladders

- All ladders shall be inspected prior and after use to ensure its good state of repair.
- Defective ladders should be taken out of service immediately. Employees should report any damaged ladder to their manager, and place a warning tag/sign on it so it won't be used until it can be properly repaired.
- Depending on the type of ladders used (Step ladders and or straight ladders), then the required safety procedures shall apply when ascending and descending the ladder.
- Both hands shall be kept free and used when ascending or descending a ladder. Always face the ladder when going up or down. Tools or materials shall not be carried in the hands while climbing or descending a ladder.
- When on a ladder, exercise caution. Do not over reach or work from the top rung or step of the ladder.
- Ensure ladders are stored in its designated areas and away from passageways, blocking of fire equipment etc.
- Ensure you assess the surrounding area of when using a ladder (e.g. Portable metal ladders should never be used while working on or near any electrical circuits).
- Depending on the extent and height of the ladder, then ensure appropriate safety harnesses are used while working on ladders.

13.10.2. Scaffolding

All scaffoldings must be erected using sound materials in a good condition and supplied by an approved scaffolding company.

Scaffolding shall follow the below requirements:

- Scaffolding shall be inspected by competent trained individuals before and after every use.
- An inspection tag shall be available on the scaffold at all times.
- Ensure that the scaffolding is not overloaded.
- No one should stand or climb over scaffolding guardrails.
- No scaffolding shall be erected to obstruct normal access.
- Contractors are not allowed to erect or carry scaffolding near live overhead electrical cables.

- All scaffolds must be provided with suitable access. Where ladders are used for this purpose they must be of an adequate length and properly secured.
- Actions shall be taken to warn personnel against using partly erected or dismantled scaffolds. "DO NOT USE" sign shall be clearly displayed.
- All scaffolding working platforms, with the exception of the ladder access points, must be closed boarded, fitted with toe-boards, including stop ends and have double guardrails (top guardrails plus intermediate)
- All scaffolding after erection must be accompanied by a certificate of safety for use.

13.11. Gas Cylinders

- Gas cylinders of any kind shall comply with the below standards:
 - Be in a good condition and not be affected by corrosion.
 - Be properly colour coded.
 - Be individually identified, labeled and stored in designated areas.
 - Have a valid test certificate.
 - Hoses shall be properly colour coded to the internationally recognized standards for gas, in good condition and fitted with hose connectors by permanent clips.
 - Check valves and flashback arrestors must be on both fuel and oxygen hoses at all times.
 - There should be regular inspections conducted on gas cylinders to verify repair and condition.
- The equipment shall be properly maintained. If a leak cannot be repaired, then equipment must be withdrawn.
- Users shall check the equipment for damaged hoses or regulators and report any defects to the supervisor.
- Gas cylinders shall not be left unattended. Arrangements shall be made to store cylinders in a suitable place.
- Cylinders shall not be left on direct sunlight.
- Oxygen and fuel gas cylinders shall be kept separate.
- Cylinders must never be used in a horizontal position and must be secured in an upright position.
- All gas cylinders must be handled with care and not be misused.
- They must be properly shut off when not in use.
- Care must be taken to ensure that gas equipment does not cause obstruction to walkways, manholes, ladders or other means of access.
- Where operations involves the use of gas and oxygen equipment in enclosed or semi-enclosed spaces, contractors must carry out frequent checks to ensure these procedures are complied with.

- Oxygen or gas cylinders must not be taken in to confined spaces for use or storage.
- No modification to tanks or drums shall be undertaken.
- Copper pipes shall not be used to join or extend any hose.

Refer to du-HSE-INS-005 for detailed procedure on how to use and handle Gas Cylinders.

13.12. Smoking

du has a strict No Smoking Policy within its premises (refer to du- HSE-PO-004). Smoking is strictly prohibited in all buildings and vehicles occupied or used by du. This is relevant to any owned, leased/rented or temporarily occupied premises by du.

Any person visiting du premises will be asked to refrain from smoking as per policy.

Appropriate signage will be used to designate smoking areas either by building management or du themselves.

Any person caught smoking within any area not designated as a smoking area will be disciplined as per the HR policies.

13.13. Health Management Programs

As part of providing health and safety programs, du has specifically developed a medical in-house clinic that would identify and implement Health related programs targeted to its risks.

A qualified medical practitioner and registered nurse shall conduct health risk assessment for which tailored health programs will be developed to educate and promote wellness within its workplaces.

For further details on the Health surveillance and wellness programs refer to the HR clinic on clinic@du.ae

14. Environmental Requirements

14.1. Policy Overview

Refer to section 4 of this document as it refers to the Corporate HSE policy contents.

14.2. Responsibility

Refer to section 4.4 for specific duties related to employees, line management and vendors.

14.3. Energy and Raw Material Management

As part of its ISO 14001 compliance requirements, du views its environmental performance as key elements to driving sustainability within the organization and the UAE. Therefore its focus on reduce, reuse and recycle concepts on conserving its raw materials usage.

Based on its applications; raw material consumptions shall be reviewed in terms of how this can be optimized and conserved in the interest of environmental awareness and protection of our natural resources.

Interest is focus on:

- **Water:** To conserve water as far as reasonably practicable during operational activities and daily usages.
- **Electricity:** to conserve energy by switching off unnecessary lighting, maintain Air-conditioning supply at set parameters and reviewing the feasibility and applications of alternative energy sources.
- **Fuel, Diesel:** to conserve the consumption of diesel used for telecom operations and back-up power requirements. Alternative energy sources and or optimizing processes shall be considered so as to reduce the fuel consumptions needed.

Vehicle fleet management shall be taken into consideration when planning routes and the selection and type of vehicles to be used. Lower engine capacity vehicles shall be considered where practicable so as to optimize on carbon emissions. Further vehicles shall be maintained regularly so as to ensure proper maintenance for its safety reasons and reductions of carbon emissions.

- **Paper:** Office paper can be optimized by printing double sided and or only printing necessary documents for archiving purposes. Electronic archiving shall also be considered as the preferred method of document control, exceptions shall be made to documents required for legal and or contractual purposes.

Refer to du-HSE-PRO-013 and Raw material Consumption

14.4. Waste Management

In accordance with its HSE commitment, du will do all that is reasonably practicable to minimize its effect on the environment. The Triple-R philosophy of: **REDUCE, REUSE, RECYCLE**, will be strongly promoted amongst employees.

Du shall implement where reasonably practicable a waste management program for its segregation and recycling properties, by conducting the following:

1. Waste segregation – by installing separate bins for the segregation of recyclable materials and non-recyclable items.
2. Wastes shall be collected by a suitable service provider for which recyclables shall be appropriated recycled and other items disposed off within the designated landfills.

Where du occupies leased premises, it should be in agreement with building owners or management for the final removal of wastes to a municipal site. They must consider the possibilities for sorting and recycling. Du has to take part in the common waste management of the building, it means respect the organization in place and be exemplar in the staff behave.

Waste will be classified as Hazardous and Non-hazardous waste. Refer to du-HSE-PRO-015 for details on waste management process.

14.4.1. Reduce/ Reuse/ Recycling Initiatives

The 3 R's (Reduce, Reuse, and Recycle) shall constitute the basis of conserving our resources used within du. Whether it is through providing services to our customers and or materials used internally; the intention is to adopt ways that would conserve and optimize our usage of natural resources that reduce our environmental footprint.

Where possible, the intention of every individual is to find ways of reducing consumptions and this can be achieved by following these methods, however it is not limited to the following:

Reducing wastes saves on purchasing and disposal costs. Therefore adopting the ways highlighted below, is one step closer to demonstrating our good environmental performance.

REDUCE

- Avoid printing emails or unnecessary documents.
- Photocopy/print double sided whenever possible. (If this feature does not automatically appear on your printer as a default mechanism, please inform IT). However, this can be individually changed under printer options.
- Print black and white rather than color.
- Archive documents in soft copy, rather than hard copy formats where possible
- Ensure that existing stock is used, rather than re-ordering (documents/ advertising pamphlets)
- When purchasing items, order them in bulk rather than individually (This avoids unnecessary individual wrapping).
- Purchase recycled items rather than virgin quality; (if you can obtain alternatives in recycled material; then ensure you opt for this).
- Use washable mugs/cups when consuming beverages.
- Switch of lights in storerooms/meeting rooms when not in use- (energy consumption is a form of waste).

REUSE

Look for ways of putting things that would otherwise be thrown away back into useful service.

- Make use of old or used paper as writing pads.
- Purchase recycled paper.
- Reuse old cardboard boxes for storage of items.
- Donate unwanted items to charity organizations.
- Use rechargeable batteries
- Reuse old envelopes when distributing internal documents.
- Reuse water bottles or plastic cups when drinking water.

RECYCLING

Recycling is just one of the ways in which waste can be minimized. It is an excellent way of saving energy and conserving the environment. We aim to introduce more recycling schemes where the environmental benefits are clear and can encompass our total wastes. Recycling of paper, plastics and used printer cartridges are some immediate methods that have been introduced into our office environment.

Other initiatives of recycling involve electronic and hazardous materials for which elements shall be recycled where practicable, so that the environmental burden on landfill sites is reduced.

14.4.2. Non –Hazardous Wastes and Hazardous Wastes (printer cartridges).

Non- Hazardous wastes – is generally defined as domestic waste which is generated in all areas where humans live or work. Wherever possible municipal refuse management will be utilized to remove this from our premises on a regular basis, if not then a certified company will be chosen to collect and dispose of such wastes.

Hazardous waste- Means an inorganic or organic element or compound that, because of its toxicological, physical, chemical or persistency properties, may exercise detrimental, acute or chronic impacts on human health and the environment. This can be generated from a variety of activities and may take the form of liquid, sludge, gas, or solid. Hazardous material can also be defined to be any substance that directly or indirectly represents a threat to human health or to the environment by introducing one or more of the following risks:

- explosion or fire
- infections, pathogens, parasites or their vectors
- chemical instability, reactions or corrosion
- acute or chronic toxicity
- cancer, mutations or birth defects
- toxicity or damage to the ecosystem or natural resources accumulation in biological food chains, persistence in the environment or multiple adverse effects.

Where hazardous wastes are being disposed off, then the appropriate collection, transportation and disposal procedures must be applied for such wastes. It shall be the responsibility of the business owner requiring the disposal of such material to contact the du HSE department to notify them on such disposals. The Applicable waste permits and zoning authority regulations shall be applied when handling and disposing of such wastes. As part of the HSE waste management procedure, it is recommended that if hazardous wastes can be recycled (where applicable) then the appropriate steps shall be taken to be reused and recycled.

The applicable destruction and safe disposal certificates shall be made available after correct disposal procedures have been applied.

14.5. Spillage Control

Refer to section 13.4. for procedures regarding handling of hazardous substances and procedure du-HSE-PRO-026 for emergency preparedness and response plan.

Individuals should be familiar with the properties and hazards of the materials with which they work with. In the event of a chemical spill (hazardous or Non-hazardous); the individual(s) who caused the spill is responsible for prompt and proper clean-up. Improper clean-up of a chemical spill may result in injury, illness, fire, a release to the environment, or property damage.

Planning for chemical spills is essential. Before beginning work with chemicals, one should be sure that he or she has adequate training for cleaning up small spills, and that the appropriate types and amounts of spill clean-up materials and personal protective equipment are immediately available.

- a) Immediately alert others in the area and the supervisor, and evacuate the area, if necessary. If there is a fire or medical attention is needed, dial **999** for an ambulance and **997** for the Civil Defense.
- b) Attend to any persons who may be contaminated. Contaminated clothing must be removed immediately and the skin flushed with water for no less than fifteen minutes.
- c) If a volatile, flammable material is spilled, immediately warn others in the area, control sources of ignition, and ventilate the area.
- d) Wear personal protective equipment, as appropriate to the hazards. Refer to your Material Safety Data Sheet for information.
- e) If the spill is a major one, if there has been a release to the environment, or if assistance is needed, contact security personnel for assistance.
- f) Protect floor drains or other means for environmental release. Spill socks and absorbents may be placed around drains, as needed.
- g) Loose spill control materials should be distributed over the entire spill area, working from the outside, circling to the centre. This reduces the chance of splash or spreading of the spilled chemical.
- h) When the spilled materials have been absorbed, use the provided Environmental Spill Kit Equipment to place materials in an appropriate container. Polyethylene bags may be used for small spills.

- i) Do not alter the chemical properties of the chemical. Contact the HSE Department for advice on storage and packaging for disposal.
- j) Decontaminate surfaces involved in the spill using a mild detergent and water, as appropriate.
- k) Replenish spill control materials
- l) Only completion of the spill clean-up, report the spill by completing the incident form – du-HSE-FOR-010.

14.6. Generators

To ensure compliance with environmental law and requirements, generators used shall follow the required measures:

1. Obtain a permit for its usage
2. Conduct environmental monitoring of its emissions so as to comply with pollutions parameters.

Placements of the generators are vital and the below considerations shall be followed:

- Shall be placed externally where possible and away from any traffic pathways.
- Where generators are placed internally then the exhaust outlet system shall be faced outwards towards the external environment. Accumulation of exhaust fumes are extremely dangerous and may result in death.
- Shall be placed away from any drainage and or water sources.
- The area surrounding the generator and especially the diesel fuel source shall be banded to contain the amount of liquid stored.
- Adequate signage shall be placed so as to inform others of its dangers.

Contractors using generators must refer to the operation and maintenance manual of the equipment.

The manual must be clearly applied.

- Engine installation and starting
- The required safety signs and labels
- Engine and general hazards information
- Maintenance intervals
- Refueling procedures
- Spill control measures

Any spillage that arise shall be immediately controlled and follow the basic procedures highlighted in section 13.5. Immediate notification to the HSE department shall be done.

14.7. Environmental Training and Awareness

Refer to section 7.0 for specific duties related to employees, line management and vendors.

14.8. Environmental Impact Assessment

An environmental impact assessment is an assessment of the possible positive or negative impact that a proposed project may have on the environment, together consisting of the natural, social and economic aspects. Therefore proper planning shall be conducted prior to the implementation of any project so as to highlight any potential environmental impacts. Project implementation shall ensure that adequate control measures are applied immediately so that its impact is limited and or reduced as far as reasonably practicable.

It is advised that you notify the HSE department so as to provide the guidance and knowledge of the various environmental impacts that may arise.

14.9. Environmental /Sustainable Initiatives

The green concept within du, are particular drives to reduce our environmental and ecological footprint by adopting ways to optimize and or conserve. Such initiatives will take the form of the 3 R's concepts highlighted in section 14.4.1 and or other simple initiatives that involve the participation of employees and or the organization changes.

It is the responsibility of every individual to adopt and participate in such initiatives implemented.

Understanding our Carbon Footprint will be the driving force on implementing green concepts and initiatives so as to reduce out footprint and ensure a sustainable environmental practice.

As a department reporting our Environmental Sustainability Performance is done through du's annual Sustainability report, which can be accessed upon request and or on www.du.ae

14.10 Life Cycle Approach

As part of its environmental implementation, the HSE management systems implements a life cycle approach when assessing the following situations:

- Aspects and its impacts root causes and applicable control measures
- Sustainable practices that is feasible
- Sourcing of its products
- Product and Material usage
- Service delivery approach

Assessing the life cycle approach is dependent on the availability of information supplied and or research done and in certain situations estimations are conducted to obtain its impacts.

15. Definitions, Abbreviations, Acronyms

Definition, Abbreviation, Acronym	Meaning
OHSAS	Occupational Health and Safety Assessment Series
ISO	International Organization for Standardization
HSE	Health, Safety, Security and Environment
HSE	Health, Safety and Environmental
UAE	United Arab Emirates
3 R's	Reduce, Reuse, Recycle
EC	Emergency Coordinator
HR	Human Resource
POP	Point of Presence
MDF	Main Distribution Frame
IDF	Intermediate Distribution Frame
CEO	Chief Operating Officer
Hazard	A source or situation with a potential for harm in terms of injury or ill health, damage to property, damage to the workplace environment, or a combination of these.

Telecommunication	Telecommunication is the exchange of information over significant distances by electronic means. A complete, single telecommunications circuit consists of two stations, each equipped with a transmitter and a receiver. The transmitter and receiver at any station may be combined into a single device called a transceiver. The medium of signal transmission can be electrical wire or cable (also known as “copper”), optical fibre or electromagnetic fields. The free-space transmission and reception of data by means of electromagnetic fields is called wireless.
Visitors	<p>Visitors shall mean any person that is not directly employed by du. This shall include any contractor or vendor (long term or short term worker) working on du sites or on behalf of du. Any supplier entering du premises to deliver items or goods and any public member visiting any du retail location or du premises.</p> <p>Specific references are made within the document stating the specific responsibilities as defined within the various sections.</p>

16. Attachments

Attached is list of du Commercial facilities, however this list may be updated on an infrequent basis due business operational requirements and not restricted or limited to the below sites.

Office Locations
Al Salam Tower
Academic City, Building 8
Academic City, Building 9
Business Central tower
Abu Dhabi Executive Office/Flagship
Fujairah Call Centre/BO
Warehouse Locations
Dubai Investment Park Bldg. No.2 & 3, 9
Al Qhusais Industrial, B72, B73
Retail Locations

Abu Dhabi Flagship (Abu Dhabi, Hamdan Street, Golden Falcon Tower, Ground Floor)
Dubai Flagship (Salam Tower)
Abu Dhabi Airport Terminal 1
Abu Dhabi Airport Terminal 3 SkyPark
Abu Dhabi Carrefour
Abu Dhabi Mall
Abu Dhabi Deerfield Mall Kiosk
Abu Dhabi Khalidiyah Mall Kiosk
Abu Dhabi Mushrif Mall Kiosk
Ajman City Centre Kiosk
Al Furjan Pavilion
Al Madina Mall
Discovery Garden Pavilion
Dragon Mart - Kiosk
Dubai Airport Terminal 1
Dubai Airport Terminal 2
Dubai Airport Terminal 3
Dubai Al Makhtoum Airport Kiosk (Dubai World Central)
Jumeirah Park Pavillion
Ras Al Khaimah Manar Mall
Sharjah Airport
Sharjah Matajer Al Mirgab Kiosk
Sharjah Matajer Al Juraina Kiosk
Sharjah Nasseriya City Centre ³
Sharjah Sahara Centre
Umm Al Quwain Carrefour
Abu Dhabi Al Wahda Mall
Abu Dhabi, Bawabat Al Sharq Mall
Abu Dhabi Dalma Mall
Abu Dhabi Marina Mall
Abu Dhabi Yas Mall
Ajman Dana Mall
Al Ain, Bawadi Mall
Al Ain, Bawadi Souq
Al Ain, Hili Mall
Al Ain, Remal Mall (Formerly Boutik Mall)
Al Barsha Mall Shop
Al Ghurair Centre
Al Khaleej Centre

Arabian Center
Bay Avenue
Century Mall
Dubai Airport Free Zone (DAFZA)
Deira City Centre
Dragon Mart - Retail Shop
Dubai Mall
Ibn Battuta Shop (Tunisia Court)
Jumeirah Centre
Mall Of Emirates
Me'aisem City Centre
Mirdif City Centre
Shindagha City Centre
Wafi Mall
Wasl District
Fujairah City Centre

17. Changes since Last Version

Rev No.	Paragraph	Description	Date of Changes
00	All	Formatting	December 2008
01	All	Changed HSE department to HSE department	April 2009
02	5. du HSE Scope	Changed Diagram to reflect new Title names	April 2009
03	5.4.1 Structure and Responsibilities, Figure 5	Edited Diagram	April 2009
	5.4.3 Figure 6, Information Flow	Edited Diagram	April 2009
04	Title Page	Image removed	Feb 2011
	Sec. 5 (table)	Update on du premises Addition of Real estate Dept.	Feb 2011
05	Sec. 5.4.1 Figure 5	Updated the figure on Dept. names	Feb 2011
		Replaced HSE Committees with HSE department and representatives	Feb 2011
06	Figure 7.	Updated Department name to Corporate services	Feb 2011
07	Updated entire Document	Revised Document – add sections and re-edited sections/subheadings). New du template format and additional information included within all sections.	July 2011

7.1	Deleted the date reference alongside OHSAS 18001 and ISO 14001.	Removed date reference 2004 and 2007.	August 2012
Rev 7.2	3.3.9 Sub Section: Top Management	Added the new appointed role of management representative as EVP: Corporate Services	May 2013 Rev 7.2
	Deleted and replacement	Deleted GS4U and replaced with AMC@du.ae	
	12.1 Section: Ergonomics	Replaced the procedure number with AMCA-FSO-POL-007	
7.3	Section 7.3.3 responsibilities for Incident Investigation	<ul style="list-style-type: none"> Labour department in accordance to Federal Law requirements 	Jan 2014, Rev 7.3
Rev 7.4	Section 2.0: du HSE Scope	<ul style="list-style-type: none"> Separated the department names as Corporates services and AMCA. 	Jan 2015, rev 7.4
Rev 8.0	Section 2.0: du HSE Scope	<ul style="list-style-type: none"> Explained the activities of the scope 	May2015, Rev 8.0
		<ul style="list-style-type: none"> Added list of site names and address to attachments 	
	Definitions table	<ul style="list-style-type: none"> Added the definition of Visitors in the manual 	
	Sec 7.1 Incident investigation	<ul style="list-style-type: none"> Added the reporting on Enterprise Asset management System: Maximo. Added Vehicle incidents and Accidents 	
Rev 9.0	Added Sec 2 context of organization	<ul style="list-style-type: none"> realigned department scope and names and changed section title from scope to Context of Organisation 	July 2017, Rev 9.0
	Sec 3. Internal and External issues	<ul style="list-style-type: none"> Described the Internal and External issues that may affect the HSE systems 	
	Sec 4.2 Leadership Commitment, Sec 4.3 Stakeholders and Interested parties Sec 4.5 HSE	<ul style="list-style-type: none"> Realigned Top management commitment clearly. Referenced the type of 	

	Objectives	<p>stakeholders that are part of the HSE systems</p> <ul style="list-style-type: none"> Addressed opportunities that can be aligned to targets and objectives. 	
	Sec 5.0 Compliance Obligations	<ul style="list-style-type: none"> Renamed the section as Compliance Obligations 	
	Sec 6.3.4.1 Opportunities	<ul style="list-style-type: none"> Addressed how opportunities can be identified and form part of continual process cycle. 	
	Sec 13.7.1 management of Outsourced Partners/Vendors	<ul style="list-style-type: none"> Addressed how vendors are managed as part of the HSE systems 	
	Sec 14.10 Life Cycle approach	<ul style="list-style-type: none"> Clearly defined how the HSE systems incorporates the life cycle approach. 	