



**ATLAS STEEL & ENGINEERING CO.**

# **HSSE PLAN**

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Atlas Steel & Engineering Co. is committed to provide safe, accident-free, and healthy work environment to its staff, customers, contractors and workers. The HSSE policies and procedures of Atlas Steel & Engineering Co. are based on its experiences, latest standards and hazards associated with works and are an integral part of the company's personnel policies.

Atlas Steel & Engineering Co.'s management is providing visible ongoing commitment, resources, and leadership to assure the implementation of the HSSE controls. We at Atlas Steel & Engineering Co. acknowledge the importance of creating a positive safety culture through continuous involvement of employees and effective policies and procedures.

## **1) Management HSSE Responsibilities**

Management shall lead by example and is required to abide by all HSSE established rules and procedures. The health and safety of any employee is the responsibility of their direct supervisor and any upper management with authority over that worker. To achieve best control and implementation, responsibilities are defined, assigned and accounted. Therefore, each level of management, supervision and employees shall have certain defined areas of responsibility, as listed below

### **HSSE, Line Function**

Any supervisors or managers with responsibility for the health and safety of their employees are granted the necessary authority to stop hazardous work activities, enforce appropriate HSSE rules like use of PPEs, and discipline violators of those rules.

### **HSSE Resources**

Adequate resources shall be available for any encountered health and safety issue, including but not limited to personnel, supplies, equipment, facilities, services and training.

### **Competent Staff**

A safety person or committee, with all necessary training, shall be available to assist line managers and supervisors in their daily operations. The safety person shall also assist the safety committee in resolving any problems and the accident investigation process.

### **The HSSE committee**

HSSE Committee is comprised of management and employee representatives with the agenda as

- a) To define goals and objectives.
- b) Address HSSE issues.
- c) Involve employees in problem solving.
- d) Monitor HSSE progress as per standards.
- e) Review overall projects status and HSSE KPIs.

**HSSE Trainings**

Adequate training is an essential necessity to any effective health and safety program. Without adequate knowledge, skill and information, management and employees cannot be expected to work in a healthy and safe manner. Therefore, management is committed to provide necessary training, demonstrations and workshops to its employees and sub-contractor's staff.

**Continuous Improvement**

Management shall periodically review the policies to assess employee input into the health and safety program. This review shall determine the effectiveness of these policies in achieving the established health and safety goals.

**Employee's Continuous Involvement**

Employee input on health and safety issues is solicited, and voluntary participation in safety and health efforts of the organization is encouraged.

**2) HSSE Implementation & Control**

HSSE performance is an integral part of any individual's job evaluation, hence all managers and supervisors are provided with the necessary trainings, skills, knowledge and tools as described in the Training Section. Refer to HSSE Plan on next page for scheduled activities, assigned resources and recurring frequency.

**Engaging Employees**

In order to promote the desired performance by individuals, positive or negative motivational factors are necessary. Top management believes that positive consequences will motivate the desired positive health and safety performances. Positive consequences include, but are not limited to bonuses, raises or other incentives for achieving health and safety goals. Desired goals are zero TRIR, incidents reporting or executing safe work practices.

Methods for stimulating employee participation are, but not limited to participation in the safety committee, employee suggestion boxes, postings, flyers, e-mail postings, policy making, chain-of-command distributions, company-wide meetings and an open door policy by upper management.

**Designate Site HSSE Supervisor**

Site supervisors' play an important part in creating and maintaining safe and healthful work practices, policies, and procedures. It is the supervisor's responsibility to identify potential hazards, identify methods to control or eliminate the hazards, ensure all employees, including of sub-contractors are engaged in safe and healthful work practices, and ensure employees receive safety and health training to do their work. Safety and health performance will be part of our supervisors' evaluations.

**Disciplinary Actions**

In the event of undesirable performance, negative motivational factors are necessary. These are verbal warning, written warning, suspension or termination in accordance with the personnel policy of this company. Negative performances may include but are not limited to excessive personal injuries or excessive violations of the HSSE rules.

## Atlas Steel & Engineering Co.

### HSSE Plan

Sr No	HSSE Elements	Work Plan	Action By	Timeline
1	<b>Leadership &amp; Commitment</b>	HSE Leadership Meetings	Management Team	Quarterly
		HSE Leadership walk around audits	Management Team	Monthly
2	<b>Eliminate Risks and Hazards</b>	Conduct HIRA before project commencement	HSSE Coordinator, Site Supervisors	Ongoing
		Periodic revision of HIRAs	Management, HSSE Coordinator	Annually
3	<b>Prevent Injuries and Accidents</b>	Report all HSSE related Risks and Hazards	All employees	Ongoing
		Report all Nearmiss, Unsafe Acts and Conditions	All employees	Ongoing
		Investigate Significant Incidents	HSSE Coordinator, Site Supervisors, Management Team	Ongoing
4	<b>Training and Awareness</b>	HSE Orientation of new employees	HSSE Coordinator	Ongoing
		Emergency evacuation drills	HSSE Coordinator	Twice a year
		Hands on fire fighting training	HSSE Coordinator	Annually
		Conduct Risk Based Trainings	HSSE Coordinator	Ongoing
5	<b>Audits and Inspection</b>	Surprise project site visits and inspections	Management, HSSE Coordinator	Ongoing
6	<b>Management Review</b>	Management Review Meeting	CEO, Management, HSSE Coordinator	Annually

**Designated HSSE Coordinator**

To coordinate, implement, and administer the HSSE policies with projects sites. Responsibilities include:

- a) Understand potential job hazards and how to eliminate them.
- b) Conduct or assist HIRA/JSA.
- c) Conduct regular job site safety and health inspections.
- d) Coordinate regular HSSE trainings to employees and sub-contractors.
- e) Conduct or assist with Tool Box Talks or Five Minute Safety Talks.
- f) Ensure Incidents are reported and accident investigations are done timely for corrective actions.
- g) Involve employees and sub-contracted workers in the HSSE implementation.

**Responding to HSSE issues**

Management will immediately take appropriate action with deployment of additional supervisors if required, subject to the severity of the issue and will review, investigate, and take any necessary and appropriate action on reported issue or hazard. The employee reporting the hazard or potential hazard will be notified of the outcome.

**Management Site Inspections**

Management and employees will participate in regular HSSE site inspections or surprise audits to verify HSSE rules are followed and will also identify potentially hazardous conditions and unsafe actions.

**Suggestions for Improvements**

Employees are encouraged to make HSSE suggestions to help improve a process, prevent an accident, or to make any improvement in the existing system. Safety suggestions can be given via email or can be verbally shared with HSSE Coordinator who will share it with HSSE Committee for further actions.

**3) HSSE Trainings**

Atlas Steel & Engineering Co. will provide training to all of its staff associated with site works, and its sub-contractors to assure the requirements of HSSE are met and continuously evaluate training needs to keep workers updated on HSSE aspects.

New employees will receive training on the company safety and health management system, safe work practices and expectations, and specific safety and health training for the tasks that they will perform.

After inspecting a job site, employee / sub-contractor will identify and evaluate all potential hazards for injuries and probability of an accident. Actions will be taken to minimize the hazards and protect the workers.

The HSSE Coordinator and Site Supervisor will appraise the skill and knowledge level of exposed workers, and provide any needed training.

Health, Safety, Security and Environment trainings shall be scheduled to overcome the needs.

Toolbox Talks: Toolbox talks will be conducted regularly (weekly). Topics covered will include:

- a) The safe work practices necessary for activity.
- b) Any safety concerns workers may have.

#### **4) Incidents Management**

All accidents resulting in injury or property damage will be investigated. The purpose of the investigation is NOT to find fault, but to find the cause of the accident so similar incidents can be prevented in the future.

##### **Accidents**

All accidents, no matter how minor must be reported to the Site Supervisor. Refer to Appendix-1 for Incident Reporting template.

Site Supervisor must report all accidents to the HSSE Coordinator as soon as possible.

Site Supervisor must complete an initial written accident investigation the day of the accident, if possible.

The HSSE Coordinator will complete a thorough accident investigation to determine root causes and corrective actions.

Near misses (situations where an accident almost happened) should be reported. Corrective action must be taken to prevent the same situation from occurring again with the potential for serious injury. All employees and workers on sites to report incidents as well as near misses to the HSSE Coordinator, so that the same corrections to be made on all job sites.

##### **Emergency Evacuation**

In case of an emergency situation on site, arises for any reason, the Site Supervisor or any other employee will follow the below procedure

Inform management or relevant authorities

- Police
- Fire
- Medical Response Team
- Ambulance Services

Method of communication will be determined at each site during the JSA.

Post names of first aid responders on site.

All above processes shall be informed prior to mobilizations and sub-contractors shall be updated when they'll report to sites for job start.

#### **5) Risk Assessment - JSA**

Atlas Steel & Engineering Co. will conduct a worksite analysis, through systematic actions that provide information as needed to recognize and understand the potential hazards of job/workplace. Listed below are types of worksite analysis actions that can assist with making an inventory of potential hazards in our workplace. JSA will help to

- a) Identify potential hazards, including those resulting because of new

- equipment, new processes etc.
- b) PPE assessment.
- c) Ergonomic analysis.
- d) Specific identification of confined spaces.

JSA is a method of planning for safety and health. The format of JSA is shown in Appendix-2.

The first component of a JSA is breaking down a job or task into the specific steps it takes to complete the job. Although this can be done in small detail, typically only the major steps are listed. This often results in five to ten steps. The steps are listed in chronological order, listing the first thing that must be done, then what comes next, and so on.

The second component of a JSA is to list all the hazards that are involved in each step. There may be many hazards that get listed next to some steps and may not be any associated with some steps.

The third step is to write down how each hazard will be eliminated or controlled. In other words, describe what needs to be done in order to perform that task safely.

### **Personal Protective Equipment**

Personal protective equipment for sites or any hazardous location shall be evaluated based on Job Safety Analysis. However a minimum requirements is

- Hard hats will be worn on job sites at all times.
- Eye protection will be worn when there are potentials of hazards from flying objects or particles, chemicals, arcing, glare, or dust.

Leather work boots shall be worn to protect from falling objects, chemicals, or stepping on sharp objects. Safety toe footwear may be necessary in some instances. Athletic or canvas-type shoes shall not be worn.

Protective gloves or clothing shall be worn when required to protect against a hazard.

Harnesses and lanyards shall be utilized for fall protection as required.

## **6) Sub-Contractor Management**

All Sub-Contractor employees and workers shall be given trainings as per

- Job Safety Analysis, recommendations and job-steps
- What and how to manage any unsafe act or incidents

To bring sub-contractors and other workers in-line with Atlas Steel & Engineering Co. HSSE standard. Sub-Contractors shall

- Use PPE (Personal Protective Equipment) set in JSA report.
- Follow HSSE process to report any abnormality or incident.

Refer to Atlas Steel & Engineering Co. typical project organization at Appendix-3.

## **7) Verification & Performance Monitoring**

HSSE Coordinator, Project Managers and management staff will conduct site HSSE inspections and perform surprise audits to gauge the level of HSSE implementation on site. The verification will also evaluate workers knowledge and compliance on safe work practices, incident reporting and usage of PPEs.

The reports from site audits and inspections shall be discussed in management meetings of Atlas Steel & Engineering Co. where actions shall be decided to fill gaps observed in said verification / audit visits.

**Appendix-1**

# Incident Report

Reported by: \_\_\_\_\_

Date: \_\_\_\_\_

Designation: \_\_\_\_\_

Incident No.: \_\_\_\_\_

## INCIDENT INFORMATION

Incident Type: \_\_\_\_\_

Date of Incident: \_\_\_\_\_

Location: \_\_\_\_\_

Project: \_\_\_\_\_

City: \_\_\_\_\_

Distt: \_\_\_\_\_

Specific Area of Plant / Process / Field: \_\_\_\_\_

### INCIDENT DESCRIPTION

### NAMES & ROLES OF PARTIES INVOLVED

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

Police Report Filed?  \_\_\_\_\_

N/A  \_\_\_\_\_

### FOLLOW-UP ACTION

REPORTEE: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_



**Appendix-3**

**ASECO - Projects / Works Organization**

