



**Global Services and Manufacturing**

**EHS Policy / Procedure**

# Corporate Environment, Health and Safety (EHS) Policy

**Reference: GSP - 021**

**Revision: 1.1**

**Effective Date: 24 May 2022**

# Corporate EHS Policy

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## STATEMENT OF GENERAL POLICY

Kamyanka Machine-Building Plant is committed to providing a safe and environmentally sound workplace for all its associates, visitors, and customers. This is a core value of Kamyanka Machine-Building Plant and means that we do all things with safety in mind.

## 1. SCOPE

1.1. The requirements contained in this policy are minimum, non-exclusive requirements, applicable to the establishment of general standards for environmental, health and safety activities and to insure that responsibility for their achievement to all managers, supervisors, and other employees throughout the corporation.

## 2. MANAGEMENT RESPONSIBILITIES

### **Vice Presidents, Directors and Senior Managers**

2.1. These managers are accountable to the Managing Director, who reports to the Chief Executive Officer (CEO), for the implementation and monitoring of the policy within their area of their responsibility.

### **Occupational Health and Safety Director**

2.2. Occupational Health and Safety Director is responsible for coordinating effective EHS policies and controls across the organization:

- The production, maintenance, and application of the Company's EHS policies and ensuring that Kamyanka Machine-Building Plant's guidelines are consistent throughout the policy.
- Monitoring and reporting on the effectiveness of elements contained within the policy.
- The provision of general advice about the implication of laws.
- The production and maintenance of EHS policies for each aspect of the services within the Company.
- Managing the timely and consistent implementation of EHS required procedures
- Coordinating the efforts in the development, implementation, and facilitation of Safety Committees in all locations
- Reporting Safety KPI's on a quarterly basis

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- Overseeing the development and delivery of specific safety training programs
- Assigning work and provides direction for development and implementation of safety programs oriented to accomplish health and safety, emergency response and injury assistance standards
- Overseeing the design of a comprehensive ergonomic process
- Acting in an advisory capacity to business unit management regarding environmental, safety and health issues
- Working with the Procurement and Engineering teams to identify, evaluate, and control hazards associated with new equipment, processes, and modifications prior to the operation of the equipment or processes
- Conducting safety audits and hazard assessments when appropriate in conjunction with applicable safety programs and/or regulations

## 3. HEALTH SAFETY AND ENVIRONMENTAL MANAGEMENT PROCESS

- 3.1. Kamyanka Machine-Building Plant believes that consideration of employee health, safety and the environment is an integral part of the management process. Therefore, Kamyanka Machine-Building Plant encourages managers and employees to approach health safety and environmental issues in a systematic way, by identifying hazards and problems, planning improvements, taking action and monitoring results so that the health and safety needs will be met from locally held budgets as part of day-to-day management.
- 3.2. If unpredictable EHS issues arise during the year, the Occupational Health and Safety Director must assess the degree of risk, in deciding the necessary resources and actions to commit to addressing these issues.

## HEALTH, SAFETY AND ENVIRONMENTAL GUIDELINES

- 3.3. It is the policy of Kamyanka Machine-Building Plant to require all managers to promote and enforce this policy. It should be considered the minimum standard for EHS for all departments and the work organized within them.
- 3.4. It is the responsibility of each Regional EHS Director or Manager to bring to the attention of all members of his or her team, the provisions of these guidelines, and ensure local EHS Representatives update their local health, safety and environmental guidelines. The contents of a guideline shall be:
  - A clear statement of the role of the department
  - Federal, state and local regulations which govern the safe and healthful work of the department.
  - Clear reference to safe methods of working, for example emergency procedures, manufacturers' or service manuals
  - Information about immediate matters of health safety and environmental concern, such as fire drills, fire exits, first aid, spill response, etc.
  - Training standards
  - The role and identity of the EHS Representative
  - Names of specialist advisers who can be approached about the work of the department
  - The manager responsible for organization and control of work
  - Accident reporting procedures
  - Departmental safety rules
  - Emergency response procedures

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## 4. IDENTIFICATION OF ENVIRONMENTAL, HEALTH AND SAFETY HAZARDS

- 4.1. It is the policy of Kamyanka Machine-Building Plant to require a thorough examination of environmental, health and safety performance against established standards in each Manufacturing Facility and Field Service Operations, at least annually and when a new process, equipment or work practice is introduced to the work performed, to determine the existence of workplace hazards and to develop methods to abate them. The technique to be adopted for such examinations will be the safety and or environmental audits. The Audits require review of:
- Standards laid down in the policy
  - Departmental guidelines
  - Relevant regulations
  - Environmental factors
  - Staff instructions
  - Methods of work
  - Contingency plans
  - Recording and reviews of information about accidents and hazards and the assessment of risk
- 4.2. The information obtained by these audits will be used to form the basis of the (Annual EHS Strategic Plan) for the department for the following year and to make necessary changes during the year. Annual audits must be completed before December of each year.
- 4.3. The responsibility for ensuring that audit activity is carried out as part of this policy rests with the Occupational Health and Safety Director or his/her designee and will be carried out by the EHS organization. Although these audits remain a management responsibility, managers are required as part of this policy to seek the involvement of the appropriate EHS Representative in insuring completion of these audits.
- 4.4. It is the management's responsibility to ensure that any deficiencies highlighted in these audits are addressed and corrected within 30 days after receiving the final audit reports or in accordance with applicable laws. Corrective actions requiring additional time for completion will be evaluated and a final completion date set and monitored.
- 4.5. Managers have responsibility for the elimination of hazards to maintain a safe working environment and shall participate in regular risk assessments that include the following 5 steps:
1. Identify hazards
  2. Evaluate and prioritize risks
  3. Determine corrective and preventative actions
  4. Assign responsibility and implement actions
  5. Review outcomes and communicate results

## 5. ENVIRONMENT, HEALTH and SAFETY REPRESENTATIVES

- 5.1. Kamyanka Machine-Building Plant will support EHS Representatives in carrying out their role and give all reasonable assistance. EHS Representatives are encouraged to discuss specific environmental, health and safety issues with the relevant heads of their department. They may also formally report hazardous or unsafe conditions to the department leader and will be formally notified of the remedial action taken or planned.

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## 6. TRAINING

- 6.1. EHS training shall be incorporated within scheduled training programs, as part of the development of a systematic training plan. EHS training needs will, therefore, be identified and planned for in the same manner as all other training needs.
- 6.2. Four areas of need shall be given special priority:
  1. Training for managers, to equip them with an understanding of their responsibilities under this policy and of the role and purpose of EHS Representatives
  2. Training for EHS Representatives to enable them to meet their responsibilities
  3. Training for all members of staff to acquaint them with the main provisions of the law and its practical implication, the main features of this policy and key safety rules
  4. Onboarding and continuing training for staff at all levels to acquaint them with existing and new requirements and hazards

## 7. RECORDS, STATISTICS AND MONITORING

- 7.1. The Company operates a special register for recording, analysis, and presentation of information about accidents, hazard situations and unexpected occurrences.

## 8. FIRST AID

- 8.1. Kamyanka Machine-Building Plant shall make provisions for First Aid and Emergency Response Teams and their training in accordance with local regulations. The EHS Representative is responsible for ensuring the requirements are implemented and for identifying and completing training needs.

## 9. EMERGENCY RESPONSE

- 9.1. EHS Representatives are responsible for ensuring that the staff receive fire, spill, evacuation, and other emergency response training as required by local law and company best practices. An Emergency Response Coordinator shall be assigned where required by local law, whose duties include:
  - Assisting the EHS Representative in the evaluation of and preparation for potential emergencies
  - Working with local fire, police, EMS and other emergency response authorities in the coordination of outside emergency assistance
  - Preparing for and conducting regular emergency response drills

## 10. CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH

- 10.1. The Control of Substances Hazardous to Health requires the local EHS Representative to identify those substances which are in use, and which are hazardous to health (as legally defined) and to assess the risk of those substances. The facility or service area must also provide and use controls to prevent exposure to substances hazardous to health; maintain controls by monitoring exposure or by health surveillance of employees; and provide information, instruction, and training for employees on all these matters. The local EHS Representative is responsible for implementing these requirements.

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## 11. ENVIRONMENTAL, HEALTH AND SAFETY RESPONSIBILITIES of ALL ASSOCIATES

- 11.1. The Health and Safety of each employee requires them to take reasonable care for Environmental, Health and Safety of themselves, their associates and the company which may be affected by their acts and omissions and co-operate with management to enable them to carry out their responsibilities.
- 11.2. The refusal of any employee to meet their obligations will be regarded as a matter to be dealt with under the company's disciplinary action policies

## 12. VISITORS OR CONTRACTORS VISITING AND OR WORKING ON COMPANY PREMISES

- 12.1. Persons visiting or working on Kamyanka Machine-Building Plant's premises who are employed by other organizations are expected to follow this policy with regard to the safety of the company's employees and their own personal safety. This responsibility will be included in contracts and/or working arrangements. Similarly, Kamyanka Machine-Building Plant employees and its sub-contractors working in other host premises will be expected to follow the host employers Environmental, Health and Safety Policies.

## 13. VISITORS AND MEMBERS OF THE PUBLIC

- 13.1. Kamyanka Machine-Building Plant wishes to ensure that as far as is reasonably practicable, the health, safety and welfare of visitors to Company establishments will be of the highest standard.
- 13.2. Any member of staff, who notices persons acting in a way which would endanger other staff, should inform a supervisor or manager. If the danger is immediate, common sense must be used to give warning, call for assistance or give aid as necessary. It is equally important not to over-react to a situation.

## 14. CONTRACTORS

- 14.1. Kamyanka Machine-Building Plant wishes to ensure that as far as is reasonably practicable, the health, safety and welfare of Contractors working in the Company's establishments will be of the highest standards. In addition, Contractors and their employees have an obligation, so far as is reasonably practicable, to ensure all equipment, materials and premises under their control are safe and without risks to health.
- 14.2. Contractors must also observe the Kamyanka Machine-Building Plant's Fire Safety Procedures. These obligations will be brought to the attention of the Contractors in the contract document issued to them. In addition, a Company Representative will be identified in the contract as having authority to stop the work of Contractors who are placing themselves, other staff, or visitors at risk. Any member of staff, who judges there is a risk where contractors are working, should inform their manager immediately.
- 14.3. Contractors will be asked to confirm they have a written health and safety policy. The Company's Manager issuing the Contract will be responsible for monitoring the health and safety performance of the Contractor and the Contractor's performance will be a factor in deciding whether or not to invite the Contractor to work again.