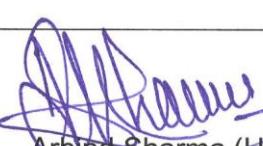
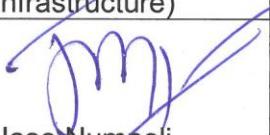
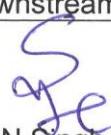


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1. PURPOSE

The purpose of this procedure is to verify adequacy, compliance and effectiveness of the HSE Management System.

In order to understand whether or not the organisation is improving in HSE performance, it is critical to establish realistic performance measures, to maintain data and set targets for continual improvement. This Procedure outlines the AMNS approach to Health, Safety and Environmental performance monitoring, measurement and identifying areas for continual improvement and sustainability.

The performance measures are aligned realistically to company activities and the legal and regulatory requirements. As the safety culture within the organisation grows, the Company may review this procedure to establish additional performance indicators.

This is achieved by -

- Defining Responsibilities
- Establishing proactive and reactive performance measures for HSE
- Records and data management
- Setting SHE objectives and performance targets for continual improvement
- Conducting Audits/ Inspections to verify compliance
- Analyse data and Identify areas for improvement and sustainability

2. SCOPE

This procedure is applicable for all AMNS projects and related operations to meet-

- ❖ Legal and regulatory requirements
- ❖ Project specific HSE requirements
- ❖ ISO 45001 and ISO 14001 standard requirements
- ❖ ISO 19011:2018 - Guidelines for auditing management systems
- ❖ Company HSE Policy

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3. DEFINITIONS & ABBREVIATIONS

3.1. DEFINITIONS:

Audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are met
Auditor	Person with the competence to conduct an audit
Non conformity	Non-fulfillment of a requirement. Any deviation from work practices, procedures, regulations, management system performance etc. that could either directly or indirectly lead to injury or illness, damage to the environment or a combination of these.
Corrective action	Action to eliminate the cause of a detected nonconformity or other undesirable situation
Preventive action	Action to eliminate the cause of potential nonconformity or other undesirable potential situation
Continual improvement	Recurring process of enhancing the HSE management system in order to achieve improvements in overall occupational health, safety and environmental performances, in line with organization's HSE policy
HSE Objectives	Goals, in terms of HSE performance, that an organization sets itself to achieve and are consistent with the HSE Policy
HSE targets	Detailed performance requirement, applicable to the organization or parts thereof, that arises from the HSE objectives and that needs to be set and met in order to achieve those objectives.
HSE Performance	Measurable results of the HSE system, related to the organization's control of health and safety risks, environmental impacts based on its HSE policy and objectives.
Workplace inspection	An inspection of a workplace, or area of a workplace, carried out to identify hazards or non-conformances with reference to HSE Plan/ standards and procedures (preferably with the help of checklist)
Inspection report/ register	A register/report for recording results of inspections. The report/register will include the name of the person(s) carried out the inspection, the area inspected, date of inspection, hazards found, and remedial actions to be taken.

3.2. ABBREVIATIONS:

- AMNS - Arcelor Mittal Nippon Steel India Limited
- HSE - Occupational Health, Safety & Environment
- SOR - Safety Observation Report – A format used to report positive and negative HSE findings

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4. RESPONSIBILITIES

The HSE Head (Projects) in concurrence with The Executive Director (ED) and Project Heads shall establish –

- HSE Performance Indicators (KPIs)
- Define Objectives and set realistic HSE Targets
- Prepare HSE annual program to achieve intended objectives
- Establish monitoring mechanism to verify compliance
- Establish mechanism to collect data to compare performance with set targets
- Prepare continual improvement plan based on performance evaluation

The HSE Head (Projects) responsible for planning, execution and implementation of Internal HSE MS Audits. The Functional Head of each Project/site shall ensure that HSE inspections are carried out as per schedules and for corrective actions/ close out of SORs.

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5. HSE PERFORMANCE INDICATORS, MONITORING AND MEASUREMENT

5.1. HSE KEY PERFORMANCE INDICATORS (KPI's)

Key HSE performance indicators (KPI's) are identified and data pertaining to those parameters are collected, analysed and reported to assist management in their overall business decisions. These performance measures shall include both leading (proactive and preventive) and lagging (reactive and corrective) indicators.

LEADING INDICATORS

Key leading indicators as indicated in Annual HSE activities calendar those include:

- HSE training hours against plan
- Compliance to HSE Audit schedule
- Compliance to VFL schedules by senior management
- Compliance to HSE inspections against plan
- Number of Near Miss incidents reported
- Number of HSE Meetings involving Project Heads/ Section Heads/ RCMs held against plan
- Compliance to Emergency Mock Drills schedule
- Percentage of actions closed Vs total actions as per Action Tracking Register (ATR)
- Percentage of actions closed with in target date as per Action Tracking Register (ATR)
- HSE Campaign/ Promotional events organized Vs planned

LAGGING INDICATORS

Key lagging indicators currently being tracked (for both employees and supervised contractors) include:

- Number of First Aid cases
- Total Recordable Case (MTC+RWC) frequency Rate (per million man-hours)
- Lost Time Injury Frequency Rate (per million man-hours)
- Number of environmental incidents (Spill of harmful substances) in terms of loss of primary containment

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The targets for each year shall be defined against each KPI at the beginning of the year and shall be reviewed and revised half yearly. The targets for subsequent year shall be decided based on over all achievement of targets and new targets with an aim for continual improvement.

LEADING INDICATORS

S.No	PERFORMANCE INDICATOR	TARGET
1.	HSE training hours against plan	90%
2.	Compliance to HSE Audit schedule	90%
3.	Compliance to VFL schedules by senior management	90%
4.	Compliance to HSE inspections against plan	90%
5.	Number of HSE Meetings involving Project Heads/ Section Heads/ RCMs held against plan	90%
6.	Compliance to Emergency Mock Drills schedule	90%
7.	Percentage of actions closed Vs total actions as per Action Tracking Register (ATR)	90%
8.	Percentage of actions closed with in target date as per Action Tracking Register (ATR)	90%
9.	HSE Campaign/ Promotional events organized Vs planned	90%

LAGGING INDICATORS

S.No	PERFORMANCE INDICATOR	TARGET
1.	Number of First aid cases	15% less than previous year
2.	Total Recordable Case (MTC+RWC) frequency Rate (per million man-hours)	0.8
3.	Lost Time Injury Frequency Rate (per million man-hours)	0.5
4.	Number of Fatalities	Zero
5.	Number of environmental incidents (Spill of harmful substances) in terms of loss of primary containment	<3 per project per year

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5.2. EVALUATION OF COMPLIANCE

The performance metrics shall be used to track HSE performance toward objectives, and as benchmarks in the continual improvement of the HSE Management System and achievement of management programs.

Compliance to legal and other requirements shall be transformed in to annual compliance calendar and shall be periodically evaluated and reported to top management.

5.2.1. HSE INSPECTIONS

Project HSE Manager for each project site shall prepare HSE inspection plan for the month/ quarterly/ half yearly or for the calendar year and shall ensure inspections are carried out as per the plan.

Daily Inspections: Daily inspections are performed by the HSE department personnel and supervisors to identify hazards prevailing/ potential to arise from on-going activities in that area and to ensure a safe working environment prior to commencing work.

Operators of respective equipment like tower crane, mobile crane, forklift, dumper, loader, excavator, manlift etc. shall carryout visual inspections daily prior to start of work.

Any hazard/defect identified shall be discussed with area supervisor/ in-charge for corrective action. Work shall be stopped against any imminent hazard of life threatening nature until corrective measures taken to reduce the risk/ made safe to continue the activity. Any deviations from set procedures or hazards identified shall be reported in the form of SOR. All observations shall be recorded in Action Tracking Register.

Weekly & Monthly Inspections: Scheduled/ planned inspections shall be carried out weekly/ monthly by HSE personnel along with site supervisors. These inspections can be for whole work area or a specific location/ element of HSE.

A team comprising of area supervisor and HSE Officer shall carry out weekly/ monthly inspections with the help of checklists. Typical inspections include:

- ❖ Scaffolding
- ❖ Ladders
- ❖ Electric and pneumatic power hand tools
- ❖ Welding machines and cables / Gas cutting set

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- ❖ Earth moving equipment
- ❖ Lifting equipment and tackle
- ❖ Full body safety harness
- ❖ Waste storage, handling and disposal
- ❖ Electrical distribution boards, cables and connectors, etc

Management Walk-through inspections: Scheduled/ random management walk-through inspections carried out at project sites to verify compliance and to demonstrate the senior management involvement in HSE Management process.

Reporting of observations and action for close out

All observations made (Positive findings and recommendations for corrective action) shall be reported through Safety Observation Report (SOR). Each project site HSE department shall follow up for actions to be taken till close out through Action Tracking Register (ATR).

5.2.2. INTERNAL AUDIT PROCESS

Internal HSE Management System audits (the so-called self-assessment) are conducted at planned intervals to determine adequacy, level of compliance to planned arrangements and effectiveness of HSE MS. Internal system audits may be performed on grouped system elements, single system elements, grouped by projects/sites under a division, individual projects or a combination thereof.

Trained and qualified internal auditors who are independent of the area to be audited shall perform HSEMS audits.

Planning for audits, audit criteria, frequency, method, reporting results, follow up actions to eliminate detected nonconformities shall be documented.

The audits are conducted as per a predetermined schedule. The Auditors should prepare a checklist before proceeding with the audit. The checklist covers the points to be audited including pending points which may have occurred since the last audit. The non conformities/ areas for improvement noted against a particular HSE Management System procedures during the audit are recorded in Audit Report. The Auditee proposes corrective actions together with the expected date of completion in agreement with the auditor.

A copy of the Audit Report is handed over to the concerned Auditee.

After elapsing the specified time given for corrective actions, Project Head appoints an auditor, preferably from the team conducted the audit, to verify the corrective actions taken. Closing of the actions is decided on the basis of effectiveness of corrective actions taken.

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Area of Audit

Internal HSE Audits are carried out, depending upon the nature and importance of system elements, with an aim to determine –

- Compliance with the HSE Policy and HSEMS;
- Compliance with the statutory requirements;
- Compliance with the contract requirements; and
- Visual observation of physical condition to identify deviations from stated requirements

Internal Audit is carried out either for –

- Whole project (With all applicable HSE elements or with reference to project specific HSE plan)
- Specific area of HSE element (like Fire safety, waste management, working at height safety, etc)
- AMNS HSE MS as a whole or against specific clause of ISO 45001 or ISO 14001 international standards

Frequency of Audit

The area and frequency of audits is decided by the project HSE Head depending on the importance and status of activities in the projects/ contracts and the previous audit results.

The Project HSE Head prepares an Audit Plan according to the “Audit Schedule”. The Audit Schedule is given to each Associate/ AMNS Project Head, at least two days in advance, to ensure the Auditee, or his representative, is present during the audit.

Internal HSEMS Audit Team

Each Audit Team consists of two or more trained Auditors who conduct an audit of each of the assigned Processes. The Project HSE Head appoints one of the auditors as Audit Team Leader to coordinate the auditing process. The auditors are from functions other than the Process being audited. The Project SHE Head maintains a list of trained Internal Auditors.

Reporting of Internal Audit Findings

The Project HSE Head reports the findings of the internal audits in a Top Management HSE Review Meeting quarterly.

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6. HSE PERFORMANCE REVIEW & CONTINUAL IMPROVEMENT

6.1. MANAGEMENT REVIEW

HSE Management Review Committee (HSEMRC) is appointed to review adequacy, suitability, level of implementation, effectiveness and to identify areas for continual improvement. The structure of HSE MRC consists of –

- ❖ Chief Executive Officer (CEO)
- ❖ Executive Director (ED)
- ❖ Project Heads
- ❖ Functional Heads of supporting functions
- ❖ Any others invited / representing the above positions

The Management Review Committee meetings are held half yearly convened by the HSE Head-Projects under the chairmanship of the CEO or his designate.

The review shall consider prospect for improvement based on the review input:

- ❖ The status of actions from previous management reviews
- ❖ Results of internal audits and evaluations of compliance with applicable compliance obligations
- ❖ The results of participation and consultation
- ❖ Relevant communication(s) from external interested parties
- ❖ The extent to which objectives have been met
- ❖ Changing circumstances, including developments in legal and other requirements, significant hazards/ Environmental aspects, risks and opportunities related to HSE
- ❖ Recommendations for continual improvement

The output of the Management Review includes decisions and actions consistent with commitment to continual improvement and related possible changes to –

- ❖ HSE performance
- ❖ HSE policy & Objectives
- ❖ Resources
- ❖ Other elements of HSE MS

The results of the review are documented, maintained by the HSE Head-Projects and made available for communication and consultation.

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6.2. NONCONFORMITY AND CORRECTIVE ACTION

Non-conformances are identified through –

- Internal HSE inspections by HSE personnel
- Reported by an employee or visitor or contractor through Safety Observation Report
- Scheduled and random inspections by Management staff
- Inspections carried out by regulatory authorities
- Internal and third party audits
- Incident investigation reports

Non-conformance, once identified, shall be investigated to identify the root cause of the problem. This shall form the basis for implementing the corrective and preventive action, which is necessary to eliminate nonconformity and to prevent its recurrence.

All non-conformities are logged into Action Tracking Register, responsibility assigned to personnel action to be taken and tracked to close out.

Any action taken either for corrective or preventive purpose shall be effective to the magnitude of problem and the associated HSE risks encountered. Verification and evaluation shall be performed in order to ensure the effectiveness of corrective actions that have been taken.

Both corrective and preventive actions taken that result in change in the HSE system shall be updated accordingly. The corrective and preventive actions taken shall be reported to the management during the HSE Management Review Committee (HSEMRC) meeting.

6.3. CONTINUAL IMPROVEMENT

AMNS shall assess suitability, adequacy and effectiveness of the HSE MS to enhance HSE Performance. AMNS shall determine the rate/extent and timescale of actions that support continual improvement. HSE performance can be enhanced by applying the HSE MS as a whole or improving one or more of its elements. Continual improvement can be established through objectives and targets for year on year.

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7. TRAINING

Personnel involved in inspections are trained on how to carry out inspections using checklists

Equipment operators shall be trained on how to carry out inspections using checklists by internal trainers (Preferably by Site HSE Officers/ Supervisors)

All personnel involved in implementing this procedure shall be trained in relevant content of this procedure.

8. RECORDS

Records pertaining to the inspection reports, audit reports and SORs shall be maintained by the Site HSE department till the completion of the project.

The Project HSE Manager maintains and controls all reports, documents and data pertaining to Internal Audits.

S.No	RECORD	MAINTAINED BY	RETENTION TIME
1.	Internal Audit Plan & Audit schedules, HSE MS Audit reports (Internal & External), Audit checklists, SORs	HSE Department	Until completion of project
2.	Checklist for subcontractor activity	HSE Department	Until completion of project
3.	Safety Observation Reports	HSE Department	Until completion of project

9. REFERENCE DOCUMENTS

- AMNS/Project/SS/HSEM/01 - HSE Management System Manual for Projects".
- ISO 14001:2015 - Standard
- ISO 45001:2018 - Standard
- AMNS-Project-SS-HSEM-16-F02 - Safety Observation Report (SOR)

10. ANNEXURE

- AMNS/Project/SS/HSEM/16-F01 - Annual HSE Audit Plan