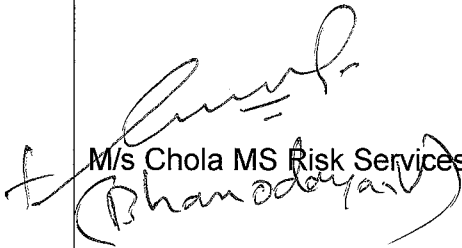
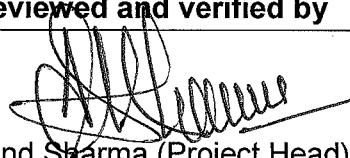
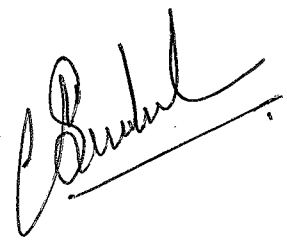
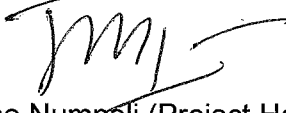

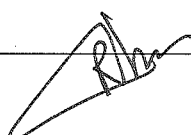



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SYSTEM STANDARD (SS)

MANAGEMENT OF CHANGE PROCEDURE

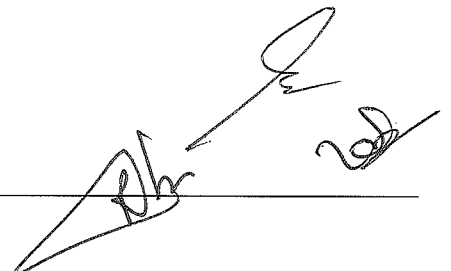
Prepared by	Reviewed and verified by	Authorized by
 M/s Chola MS Risk Services (Bhanodayan)	 Arbind Sharma (Project Head)	 Santhosh Mundhada (Executive Director)
	 Jose Numpeli (Project Head)	
	 3/2/2023 Samar Suri (Project Head)	

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Document Change Note

Rev. No	Rev. Date	Comments / Changes
00	5-12-2022	New Issue



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1 PURPOSE

The purpose of this procedure is to ensure that any changes from the planned work are reviewed, authorized, documented and implemented.

The purpose of the MOC program is to assure:

- The benefits of the change are clear and reasonable (technical basis for change)
- All potential HSE impacts have been identified and evaluated
- Associated or related change needs are addressed (changes to procedures resulting from change)
- Training needs have been reviewed
- All affected personnel are made aware of the change
- Proper authorization for the change has been obtained

2 SCOPE

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

- Legal and regulatory requirements
- AMNS HSE requirements
- ISO 45001 and ISO 14001 standard requirements
- AMNS HSE Policy

3 DEFINITIONS

3.1 DEFINITIONS

Change: Any alteration in the form of -

- ❖ Engineering/Technical - New / Modified or Relocated Facility or Equipment
- ❖ Work Standards - Work method/ process flow/ Task sequence, automation of manual tasks, etc
- ❖ Organisational - Change to personnel or organisation (Like shift working, sectional re organization)
- ❖ Administrative - Change to Procedures, regulatory requirements, etc

Process: Any activity that involves work to produce an end output or results

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3.2 ABBREVIATIONS

MOC - Management of Change

P&ID - Process and Instrument Diagram

JSA - Job Safety Analysis

HSE - Occupational Health, Safety & Environment

HIRAC - Hazard identification, risk assessment and control

4 RESPONSIBILITIES

Project In charge will be responsible for the overall implementation of the Management Of Change (MOC) Program.

The following person(s) or job classification will be responsible for:

Initiating MOC : Construction Manager

Reviewing MOC : A team comprising trained personnel in MOC process

Reviewing & Authorizing MOC: Project Head

Follow Up : HSE Manager

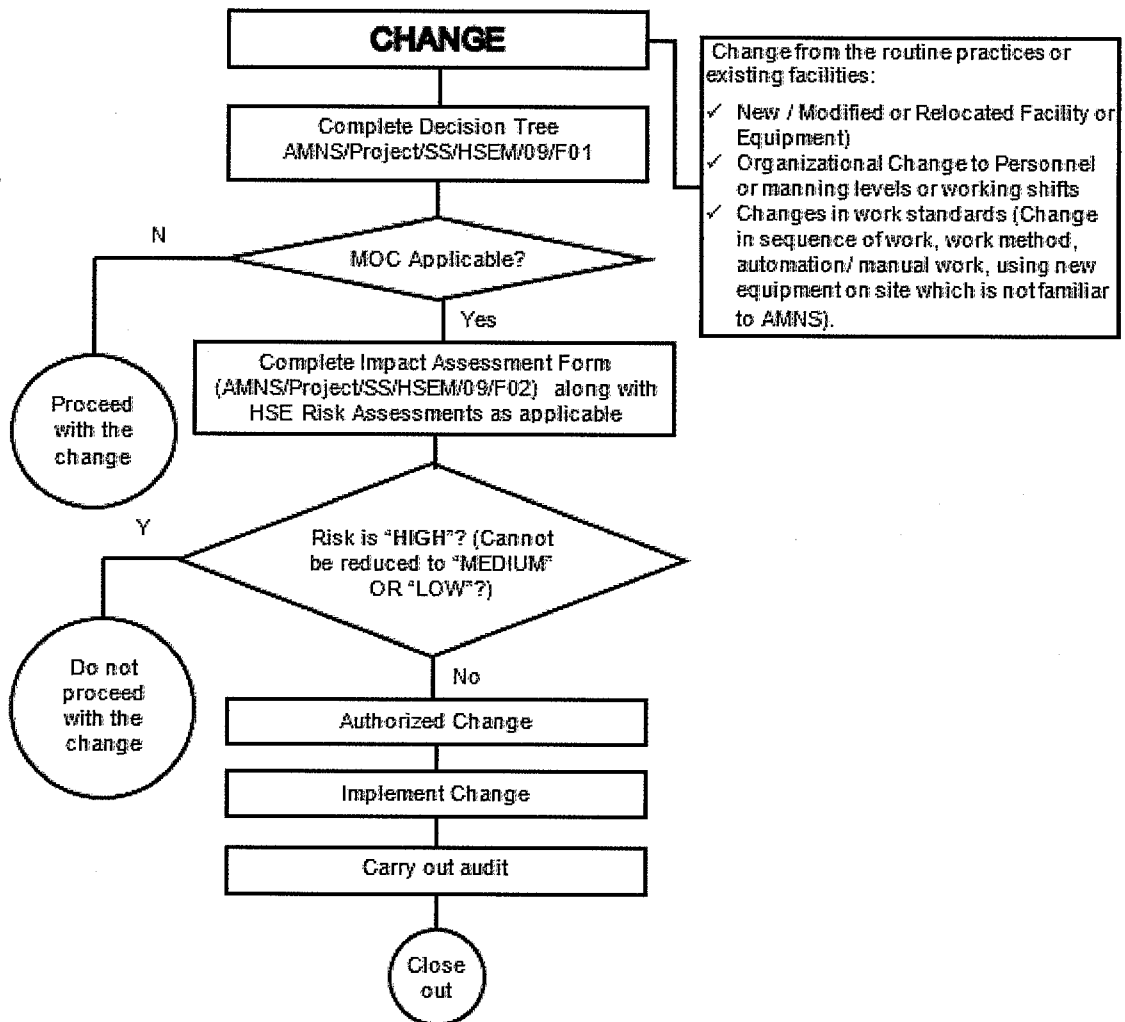
Training : HSE department

Record Keeping : HSE department

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5 DESCRIPTION

5.1 MOC PROCESS FLOW CHART



5.2 THE NEED FOR A MOC PROGRAMME

A MOC program is designed to identify and manage situations that are changes from the ordinary. They can be complex (such as the start of a new project which is new to the company), or relatively simple (a last minute change in the way of erecting a duct due to unavailability of the planned equipment). However, if not managed they will all have the same result; the introduction of unplanned, unmanaged risk elements and the disruption of normal operations.

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5.3 SITUATIONS REQUIRING THE APPLICATION OF MOC PROCESS

The following are situations requiring the application of the MOC process (also see AMNS-Project-SS-HSEM-09-F01 - MOC Decision Tree) -

- Introduction of new, or modification to existing activities which handles, or uses potentially hazardous chemicals
- Any operations which could place a mechanical device outside its design or designated limits (Lift capacity)
- Any operation which would require the bypass or altering of emergency shut down or other safety systems/ working on live electrical systems.
- Changes to current operating process systems (P&ID's, electrical or service lines) which could necessitate updates to training, changes to operational procedures, or revision of JSAs.
- Changes to employee work loading (hours being worked, number of persons per shift) which could change operating sequence or introduce a higher level of risk.
- Change in legislative or internal HSE compliance requirements, requiring procedural and/or training changes.

5.4 RESPONSIBILITY FOR INITIATING THE MOC PROCESS

Responsibility for initiating the formal MOC process rests with the Construction Manager or HSE Manager. Knowing the situations that could require a MOC process to be reviewed (defined in Section 5.2), project execution personnel shall form a work team as required starting the review process. HSE may be involved as needed to provide technical assistance in conducting risk assessments, hazard studies and regulatory reviews as part of the MOC process.

5.5 THE MOC REVIEW AND AUTHORIZATION PROCESS

HSE reviews will be performed at key milestones established at the beginning of the activity to verify that HSE issues are identified, addressed, and implemented. These milestones include:

- Concept or planning stages.
 - A statement of the purpose of the modification and changes.
 - Details of the proposed changes and modifications.
 - Details of the options considered and the reason for the chosen option.
- Completion of detailed plans, but prior to construction or purchase
 - An evaluation of the impact of the change on other processes, HSE aspects and the documentation that will need to be changed.

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AMNS-Project-SS-HSEM-09-F02 "Change Impact Assessment Form" shall be used to document formal MOC reviews and activities and filed with that specific proposed change. Use of the impact assessment form may assist in identifying areas where more formal and detailed risk assessments are needed in order to identify and define control measures.

Refer to the procedure "AMNS-Project-SS-HSEM-08 - HIRAC Procedure" for how to carry out risk assessments, risk evaluation and ranking, criteria for acceptable risk and risk reduction priorities.

Prior to the implementation of change, all necessary authorizations shall be documented and signed by the relevant personnel through "AMNS-Project-SS-HSEM-09-F03 – Change Authorization Form"

Once changes have been implemented, an audit shall take place to ensure that the objectives are achieved and that all necessary steps have been completed, including all documentation revisions.

6 TRAINING

Personnel involved in MOC review and authorization shall receive training in MOC procedure.

Training will be evaluated and updated based on change in positions/ involvement in MOC process.

7 RECORD KEEPING

S. No.	Title	Maintained by	Retention period
01	MOC checklists and forms	HSE Department	Until completion of project
02	Training attendance records	HSE Department	Until completion of project

8 REFERENCE DOCUMENTS

AMNS-Project-SS-HSEM-08 - Hazard identification, risk assessment and control (HIRAC)

9 ANNEXURES

AMNS-Project-SS-HSEM-09-F01 - MOC Decision Tree

AMNS-Project-SS-HSEM-09-F02 - Change Impact Assessment Form

AMNS-Project-SS-HSEM-09-F03 - Change Authorization Form

AM/NS INDIA	ARCELOR MITTAL NIPPON STEEL INDIA LIMITED	AMNS/Project/SS/HSEM/09/F01
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Review each potential scenario:

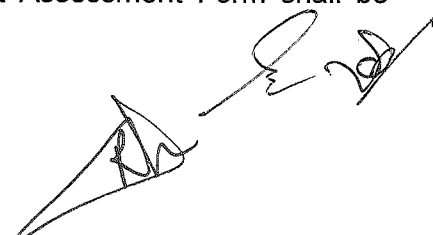
Is proposed change involves use of hazardous chemicals?	Yes	YES	NO
Is proposed activity is new or change from routine?	Yes	YES	NO
Are activities planned that could place a mechanical device outside its design limitations (pressure, temperature, lift capacity, etc.)?	Yes	YES	NO
Could operation require/result in bypass or altering of emergency shut down or changes in process line or other safety system devices?	Yes	YES	NO
Are there changes to operating systems (electrical/service lines, P&ID, etc.) that could require re-training or JSA changes?	Yes	YES	NO
Is there an addition/change to contractor work group that requires change to JSA or increase in relative risk level?	Yes	YES	NO
Is there change in employee loading (hours worked, number on shift, etc.) which would increase relative risk level?	Yes	YES	NO
Is equipment/materials/process being added/changed, which would increase relative risk level or require re-training or change	Yes	YES	NO
Is there a change in legislative or internal HSE requirements requiring change in training or operations procedures?	Yes	YES	NO

Go to
AMNS/Project/SS/HSEM/
09/F02 – Change Impact
Assessment form

MOC is applicable

YES	NO
-----	----

Note: If for any of the conditions is "YES", Change Impact Assessment Form shall be completed.



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CHANGE IMPACT ASSESSMENT

Change Proposed By: _____ Date: _____ Ref No: _____

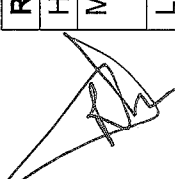

Proposed Change: _____

Project/Area/location: _____ Date change is required by: _____

Reasons for Change: _____

PROPOSED CHANGE	IMPACT OF CHANGE ON: (SCHEDULE/ PROCESS/ WORK STANDARD/ ORGANISATIONAL/ ADMINISTRATIVE/ HSE)	CONTROL MEASURES TO MITIGATE IMPACT ON NON HSE ASPECTS	DOES HSE (RA) REQUIRED?	RISK RANKING FROM THE RISK ASSESSMENT

RISK SCORE	AUTHORISATION TEAM
HIGH	Intended change cannot be authorised until additional control measures are taken to bring the risk to Medium or lower level
MEDIUM	Change can be authorised but additional control measures to be sought / continuous monitoring mechanism is established to reduce risk to low
LOW	Change can be authorised with continuous monitoring mechanism is established to prevent escalation of risk to higher levels
NEGLIGIBLE	Change can be authorised without any additional precautions

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CHANGE AUTHORIZATION

Change Proposed by :	Date:	Ref:	Project/ Location:
Description of proposed change: _____			

TYPE OF CHANGE			
<input type="checkbox"/> EQUIPMENT	<input type="checkbox"/> PROCESS	<input type="checkbox"/> ORGANISATIONAL	<input type="checkbox"/> WORK STANDARD <input type="checkbox"/> OTHER:

ACCEPTED ☐
 DECLINED ☐

Change Authorization	FUNCTIONAL AREA	Name	Signature	Date
	AREA INCHARGE			
	HSE			
	PROJECT INCHARGE			
	ANY OTHERS (IF REQUIRED)			

Reason for declining of changing (If declined):

Change completion date:	Audit/Review date: