INTEGRATED MANAGEMENT SYSTEM MANUAL

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0.0 About Ghantoot Group Roads & Infrastructure Division

Ghantoot Transport & General Contracting L.L.C - Roads & Infrastructure Division is a Division of Ghantoot Group of Companies, with its core business in Civil Engineering construction and base location in Abu Dhabi.

Ghantoot Roads & Infrastructure Division has been in the construction Industry since 1997, mainly concentrating on Roads, Bridges, and Earthmoving, Water networks, Drainage works, Electrical, Street lighting, Landscaping and infrastructure works. The company has carved a niche in the construction field through its well-trained work force, aiming at completing projects on or before schedule and to the required quality.

The applications of state of the art technologies and modern equipment have been the main contributors for the successful execution of large projects. The company has the capability and potential to execute large projects and complete them on schedule.

Client’s confidence in Ghantoot L.L.C is demonstrated by the fact that since its commencement of operations in 1997, Ghantoot L.L.C has been given the opportunities to undertake various construction projects amounting to approximately AED 18.0 Billion.

Ghantoot L.L.C will always be characterized by its strength to deliver projects on time with high standards of quality and the ability to fulfill customers’ needs and satisfaction.

Ghantoot Roads & Infrastructure Division has an established Integrated Management System since early 2006 and the certifications have been upgraded to ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018.

Ghantoot group of companies has its presence in the Emirate of Abu Dhabi, Dubai, Sharjah and Fujairah in United Arab Emirates with business interests ranging from; Civil engineering and Building construction, Electrical, Drainage, Marine, Quarrying, Ready mix concrete, transportation, Steel fabrication, interior decoration works, Marble & Tiles production, Landscaping & Irrigation division and petroleum projects.
1.0 About the Ghantoot Roads & Infrastructure Division Integrated Management System Manual

This Integrated Management System (IMS) Manual describes the basic structure of the quality, health, safety, and environment management system and its application within Ghantoot Roads & Infrastructure Division.

All operations and activities that directly affect the quality, health, safety, and environment of our project sites, offices and camps are controlled by processes, procedures and associated documents written to comply with the requirements of the following local and international recognized standards:


ISO 9001 is the foundation of our Quality management system. The adoption of EN ISO 9001 ensures a strong foundation for well-established processes and a Quality System that supports continual improvement, business growth and efficiency.


ISO 14001 is a standard for the environmental management elements of the Integrated Management System. The addition of ISO 14001 provides a framework for conducting business in an environmentally responsible manner. Ghantoot’s core Environmental Management System procedures are:

- Operational Control
- Aspects & Impacts
- Emergency preparedness & Response
- Compliance with Legal & Other Requirements

The required procedure references are made in the appropriate sections of this manual as well as the Occupational Health Safety and Environment Management System (HSEMS) Manual (GTGC-RID-HSEMS-MAN-02).


ISO 45001:2018 provides a framework for conducting business in an atmosphere which is safe from the point of view of occupational health and safety.

Our core Occupational Health and Safety procedures are:
Operational Control.
- Hazard Identification & Risk Assessment
- Emergency preparedness & Response.
- Compliance with Legal & Other Requirements.
- Incident Investigation.
- Roles, Responsibilities, Accountabilities and authorities.

**OSHAD SF- Occupational Safety and Health Abu Dhabi – System Framework**

The mandatory requirements as in the OSHAD SF Elements; Mechanisms, CoPs, Standards Forms, Standards and Guideline, Values and the non-mandatory documents, Technical Guidelines and Guidance Documents.

**Information security management system (ISMS) ISO 27001**

**Relationship of Elements**

The relationships among the Ghantoot's IMS, OHSAD SF and HSEMS is that all 3 are overlapping and connected. However, the IMS is a system generally illustrating the overall QHSE management system of Ghantoot Roads & Infrastructure Division, where the HSEMS presents in further depth and detail the elements of occupational health safety and environment specifically and the OHSAD SF the Abu Dhabi regulations for occupational health and safety specifically.

Relationship of Elements
Required processes along with the supporting processes have been identified, logically sequenced, and mapped to effectively implement, maintain and continually improve the Integrated Management System and documents.

Where we have chosen to outsource any processes that can affect the conformity of products / project and service requirement, we ensure that such processes are controlled. Any such processes and their controls are identified in the appropriate procedures (GTGC-RID-OP-PRC-03 Outsourcing, GTGC-RID-OP-PRC-04 Procurement and Asset, GTGC-RID-OP-PRC-08 Contractors Performance Control)

As part of the measurement, analysis and improvement process, we monitor, measures, and analyze these processes as appropriate and take necessary actions to achieve the planned results and improve continually. Effectiveness of the integrated management systems are checked through internal audits, management review, review of customer satisfaction and communications received from the interested parties.

The Integrated Management System is a 4-tier set of documents as described below.

Ghantoot Roads & Infrastructure Division demands that all activities supporting our projects and operations be controlled and improved reflecting our integrated management principles, our positive approach to the health
and safety of our employees and concern for the environment. The specific quality, health, safety, and environment requirements are documented in a suite of standard procedures and specific departmental procedures / QHSE plans.

Where necessary on a project, we may be required to adopt the procedures of our Client in place of our own established procedures. This is acceptable when clearly stated in the Quality, Health & Safety, or Environmental Plan for that project and the procedures being adopted are mapped against the Ghantoot Roads & Infrastructure Division’s IMS. This must be approved by the QHSE lead depending on the procedures being adopted.

This manual presents “Notes” which are used to define how Ghantoot Roads & Infrastructure Division has tailored its management system to suit its purposes. These are intended to clarify implementation approaches and interpretations for concepts which are not otherwise clearly defined in the three standards. Notes appear in italics, with gray background.

2.0 Terms and Definitions

Ghantoot Roads & Infrastructure Division adopts the following terms and definitions within its Integrated Management System. Where no definition is provided, the company typically adopts the definitions provided in ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018. In some cases, specific procedures or documentation may provide a different definition to be used in the context of that document; in such cases, the definition will supersede those provided for in this IMS Manual.

General Terminology

- QHSE – Quality, Health, Safety, and Environmental
- Document – written information used to describe how an activity is done.
- Record – captured evidence of an activity having been done.
- Policy – intentions and direction of an organization formally expressed by its top management.

Risk-Based Thinking Terminology

- Risk – Negative effect of uncertainty
- Opportunity – Positive effect of uncertainty
Uncertainty - A deficiency of information related to understanding or knowledge of an event, its consequence, or likelihood. (Not to be confused with measurement uncertainty.)

Nonconforming Product Terminology

Use As Is: Wherein the product or process outcome shall be kept as it is. Appropriate approval shall be taken in this regard.

Rework: Efforts to bring nonconforming product into conformance through additional operations that do not alter the original design of the product.

Repair: Efforts to bring nonconforming product into conformance through additional operations that alter the original design of the product; this may be through the addition of material no specified in the original design, or through altering pre-existing design features.

Reject: The discard of nonconforming product in lieu of rework or repair. The material to be rejected by the addressee. Appropriate approval shall be taken in this regards.

Others: If any other relevant disposal mechanism to be proposed.

N/A: Wherein the NCR/Observation is declared void.

Environment:

- Surroundings in this context extended from within the organization to the local, regional and globally.
- Surroundings can include air, water, land, natural resources, biodiversity and ecosystems, humans and their interactions.
Environmental Aspect: Our production and erection activities, products and services which interact with the environment.

Environmental Impact: Any area of change to the environment, whether adverse or beneficial, wholly, or partially, resulting from our organisation’s environmental aspects.

Significant Environmental Impact: Any area of change to the environment, which causes substantial or unacceptable range of risk.

Health & Safety

Hazard: source, situation, or act with a potential for harm in terms of human injury or ill health, or a combination.

Risk: combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health that can be caused by the event or exposure(s)

Risk assessment: process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable

Normative Reference

The following International Standards and applicable regulations have been used as reference documents for the development of Integrated Management System.

- Environmental Management System (ISO 14001:2015)
- OSHAD SF Abu Dhabi occupational Safety and Health system framework
- Ministry of Labor & Social Affairs – Federal Law No.8 : 1980 on regulation of labor regulations
- Ministry of Labor & Social Affairs – Ministerial Order No. 32 : 1982
The Determination of Retentive Methods and Measures for the Protection of Workers from the Risks of Work and the determination of the ways and means to protect employees against occupational hazards.

- UAE Health Authority Regulations
- TRANSCO & ADWEA Rules and Regulations
- ADNOC Rules and Regulations
- Federal Law No. (24) of 1999 for the protection and development of the environment.
- The most updated version (latest version) of OSHAD SF.

Decree No. 42 of 2009- concerning the Environment, Health and Safety Management System in Abu Dhabi Emirates and the resulting OSHAD SF.

3.0 Context of the Organization

3.1 Understanding the Organization and Its Context

Ghantoot Roads & Infrastructure Division has reviewed and analyzed key aspects of itself and its stakeholders to determine the strategic direction of the company. This requires understanding internal and external issues that are of concern to Ghantoot Roads & Infrastructure Division and its interested parties (per 4.2 below); the interested parties are identified per the document GTGC-RID-IMS-PRC-06 Context of the Organization.

Such issues are monitored and updated as appropriate, and discussed as part of management reviews.

3.2 Understanding the Needs and Expectations of Interested Parties

The issues determined per 4.1 above are identified through an analysis of risks facing Ghantoot Roads & Infrastructure Division and its interested parties. “Interested parties“ are those stakeholders who receive our roads and infrastructure products, or who may be impacted by them, or those parties who may otherwise have a significant interest in our company. These parties are identified per the document GTGC-RID-IMS-PRC-06 Context of the Organization.

This information is then used by senior management to determine the company’s strategic direction. This is defined in records of management review, and periodically updated as conditions and situations change.
The organization shall determine which compliance obligation affects the organization from the needs and expectations of interested parties and recorded as per GTGC-RID-IMS-PRC-06 Context of the Organization.

3.3 Determining the Scope of the Quality, Health, Safety and Environmental Management System

Based on an analysis of the above issues of concern, interests of stakeholders, and in consideration of its products and services, Ghantoot Roads & Infrastructure Division has determined the scope of the management system as follows:

Ghantoot Roads & Infrastructure Division has its core business in Civil Engineering construction throughout the UAE and its region. Ghantoot Roads & Infrastructure Division mainly concentrating on Roads, Bridges, and Earthmoving, Water networks, Drainage works, Electrical, Street lighting, Landscaping and infrastructure works.

The product and services provided, Ghantoot Roads & Infrastructure Division has established, documented and implemented an Integrated Management System (IMS) in accordance with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018

Ghantoot Roads & Infrastructure Division has analyzed who their interested parties are, their interactions both internally and externally from a risk and opportunity based approach.

Ghantoot Roads & Infrastructure Division leadership shall have a “hands on” approach to ensure that all aspects of the organization is utilized to its full capacity through a process based approach, and that each process is monitored for its performance through established management objectives.

Effective communications and awareness are key to ensure that all employees, stakeholders and other interested parties are fully aware of our QSHE policy and relevant applicable information.

Ghantoot Roads & Infrastructure Division will identify, review, treat, and communicate all QSHE risks, opportunities and significant environmental impacts to all interested parties and this includes a review of legal requirement and ensure that compliance obligations are being implemented.

The IMS is maintained and continually improved through the use of the QSHE policy, management objectives, audit results, analysis of data, corrective action and management review.
The integrated management system applies to all processes, activities and employees within the company. The headquarter is located in Abu Dhabi and the office details are as follows:

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Website: [www.ghantootgroup.com](http://www.ghantootgroup.com) & [www.ghantootroads.com](http://www.ghantootroads.com)

There are no exclusions claimed for any of the three standards.

3.4 Quality, Health, Safety, and Environmental Management System and its Processes

3.4.1 Process Identification

Ghantoot Roads & Infrastructure Division has adopted a process approach for its management system. By identifying the top-level processes within the company, and then managing each of these discretely, this reduces the potential for nonconforming product during final processes or after delivery. Instead, nonconformities and risks are identified in real time, by actions taken within each of the top-level processes.

Each process shall be reviewed through a risk based approach to ensure that all environmental aspects, impacts, health and safety have been identified and recorded if applicable against the risk criteria set out in GTGC-RID-IMS-PRC-01 Risk and Opportunities Management.

Note: not all activities are considered “processes” – the term “process” in this context indicates the activity has been elevated to a higher level of control and management oversight. The controls indicated herein are applicable only to the top-level processes identified.

List of Ghantoot Roads & Infrastructure IMS and Operational Procedures:
Each process may be supported by other activities, such as tasks or sub-processes. Monitoring and control of top level processes ensures effective implementation and control of all subordinate tasks or sub-processes.

Each top-level process has a **Standard Operating Procedure** document which defines:

- applicable inputs and outputs
- process owner(s)
- applicable responsibilities and authorities
- applicable risks and opportunities
- critical and supporting resources
- criteria and methods employed to ensure the effectiveness of the process
- quality, health & safety, and environmental objectives related to that process

The sequence of interaction of these processes is illustrated in Appendix A.

*Note: Appendix A represents the typical sequence of processes, and may be altered depending on customer or regulatory requirements at the job or contract level, as needed.*

### 3.4.2 Process Controls & Objectives

Each process has at least one objective established for it; this is a statement of the intent of the process. Each objective is then supported by at least one “metric” which is then measured to determine the process’ ability to
meet the overall organisations objectives.

Note: some processes have multiple objectives and multiple metrics. This is determined by the nature of the process, its impact on the project delivery and associated risks.

Periodically, metrics data is measured and gathered by process owners or other assigned managers from all the running project sites, in order to present the data to QHSE team. The data is then analyzed by the QHSE team in order for the top management to set goals and make adjustments for the purposes of long-term continual improvement.

The specific QSHE objectives for each project are defined in the specific project plans such as, project specific quality plan and the project specific HSE plan.

The objectives are monitored on a monthly basis, reviewed every six months and analyzed at the management review meeting (MRM).

Metrics, along with current standings and goals for each objective, are recorded in records of management review.

When a process does not meet a goal, or an unexpected problem is encountered with a process, the corrective action process is implemented to research and resolve the issue. In addition, opportunities for improvement are sought and implemented, for the identified processes.

3.4.3 Outsourced Processes

Any process performed by a third party is considered an “outsourced process” and must be controlled, as well. The company’s outsourced processes, and the control methods implemented for each, are defined in GTGC-RID-OP-PRC-03 Outsourcing Procedure.

Note: some processes in the outsourcing procedure are either interlinked with or part of the procurement processes for subcontractors procurement

The type and extent of control to be applied to the outsourced process take into consideration:

a) the potential QSHE impact of the outsourced process on the company’s capability to provide product that conforms to requirements,

b) the degree to which the control for the process is shared,

c) the capability of achieving the necessary control through the purchasing contract requirements
d) The environmental aspect, impact and its interaction it will have on the organization and surrounding environment, and include methods of control.

e) All outsourcing shall be evaluated and assessed for its risks which may have an impact on all personnel.

4.0 Leadership

4.1 Leadership & Commitment

4.1.1 General

The Management of Ghantoot Roads & Infrastructure Division in conjunction with the QHSE team provide evidence of its leadership and commitment to the development and implementation of the management system and continually improving its effectiveness by:

a) taking accountability of the effectiveness of the management system;

b) ensuring that the Integrated QHSE Policy and management objectives are established for the management system and are compatible with the strategic direction and the context of the organization;

c) ensuring the integration of the management system requirements into the organization’s other business processes, as deemed appropriate;

d) promoting awareness of the process approach;

e) ensuring that the resources needed for the management system are available;

f) communicating the importance of effective integrated management and of conforming to the management system requirements;

g) ensuring that the management system achieves its intended results;

h) engaging, directing and supporting persons to contribute to the effectiveness of the management system;

i) promoting continual improvement;

j) supporting other relevant management roles to demonstrate their leadership as it applies to their areas
of responsibility

k) adopts a “hands on” approach to leadership through effective meetings at irregular basis.

4.1.2 Customer focus

The management of Ghantoot Roads & Infrastructure Division adopts a customer-first approach which ensures that customer needs and expectations are determined, converted into requirements and are met with the aim of enhancing customer satisfaction.

This is accomplished by assuring:

a) customer and applicable statutory and regulatory requirements are determined, understood and consistently met;

b) the risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed;

c) the focus on enhancing customer satisfaction is maintained

d) ensuring that our products or service has minimal effect on the environment

e) ensuring that our products or service has minimal effect on health and safety of personnel

4.2 Policy

The management together with QHSE team have developed the Polices for Quality, Health, Safety and Environment, defined in section 3.0 above, that governs day-to-day operations to ensure quality, health, safety, and environmental process are being implemented.

The QHSE Policies are released as a standalone document as well, and is communicated and implemented throughout the organization.

Our QHSE Policies;

- Are appropriate to the scale and nature of its activities;
- Address its commitment with respect to Quality, Health & Safety and Environment as per the requirements of the standard
- Include a frame work for setting and reviewing integrated objectives and targets.
- Addresses our commitment to prevent injury, ill health, any damage to environment and to take adequate measures to monitor, review and continually improve IMS Systems and its performance.
- Includes a commitment to comply with all regulatory and legal requirements.

The Integrated Management Policy is communicated within the organization through internal meetings, by displaying at key locations throughout the workplace, by posting at sites and included in the employee training. Communications to external parties are through brochures and websites.

Printed copy of the policy will be made available to the public / interested parties on written request to the QHSE team lead.

An insight about the organizational goals, objectives, targets, and key elements of the integrated management system are shared with new employees as a part of their orientation.

During the Management Review Meetings (MRM), management reviews the policy statement, key system elements to ensure its appropriateness, effectiveness and continued suitability to the organization. Additional review of the IMS policy is carried out whenever there is change in business plan, location, corporate structure, and change in regulatory or legal requirements which are required to be complied with.

**Principles**

We are committed to provide the Projects and services as per the customer requirement. We actively consider the environmental impacts, potential impacts, risks and potential risks while making decisions and work to minimize the footprint on the environment and issues related to health and safety. Depending upon the changing scenario of the business, QHSE (Quality, Health, and safety, Environment) programs are adapted to meet the needs.

**Objectives**

All QHSE objectives are established and measured periodically and discussed during QHSE and Management review meetings for evaluation and improvements.

The QHSE Policies of Ghantoot Roads & Infrastructure Division are attached as appendix B

**4.3 Organizational Roles Responsibilities and Authorities**

The Management has assigned responsibilities and authorities for all relevant roles in the company. These are communicated through the combination of the Ghantoot Roads & Infrastructure Division’s Organizational
**Chart**, projects organization chart, job description and responsibility and authority matrixes specific and relevant to each stand operating procedure.

The organizational chart is attached as Appendix C.

In addition, the following overall Integrated Management System responsibilities and authorities are assigned as follows:

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<th>Responsibility</th>
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<tr>
<td>Ensuring that the integrated management system conforms to applicable standards</td>
<td>Management and QHSE team</td>
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<tr>
<td>Ensuring that the processes are delivering their intended outputs</td>
<td>Applicable process owner</td>
</tr>
<tr>
<td>Reporting on the performance of the integrated management system and providing opportunities for improvement for the management system</td>
<td>QHSE team</td>
</tr>
<tr>
<td>Ensuring the promotion of customer focus throughout the organization</td>
<td>Management</td>
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<tr>
<td>Ensuring that the integrity of the integrated management system is maintained when changes are planned and implemented</td>
<td>Management</td>
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<tr>
<td>Ensuring HSE management system conforms to applicable standards and local legislation requirements</td>
<td>Management</td>
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The QHSE team has been assigned the role of Ghantoot Roads & Infrastructure Division’s point of contact to represent Ghantoot Roads & Infrastructure Division Integrated Management system is useful or required by customer or regulations. Other duties of the QHSE team may be defined herein or within other documented procedures.

**HSE Line Management & Organisation**

HSE functions within Ghantoot Roads & Infrastructure Division are found at the corporate, and the division/department levels and projects. HSE is line management responsibility in GTGC. All Projects normally employ a full-time HSE professional in accordance to OSHAD-SF. On the corporate level, the Corporate HSE Manager of the HSE function reports to the General Manager of the company.
HSE Officers at the site/facilities level reports organizationally to a wide range of functions including Project Managers and HSE Manager.

All levels of management in all areas are responsible for the implementation, communication, monitoring and reviewing the HSE system. Responsibilities and authorities are documented in specific job descriptions.

The management provides the resources essential for implementation, control and improvement of the HSE Management System. *(GTGC-RID-HSEMS-MAN-02 HSE Management System Manual).*

- The Company (GTGC), management and staff are committed to utilize a systematic approach to ensure compliance with HSE polices procedures and regulatory standards developed by the client, all local and national health, HSE and environment (HSE) laws and regulations that apply to its activities.
- The Company management and staff are committed to conduct activities in a manner designed to minimize HSE risks to a level which is as Low as Reasonably Practicable.
- The Company management and staff aim to play a leading role in setting and promoting best HSE practice that apply to its activities.
- The Company management will ensure that employees and visitors on sites are at a similar level of commitment by adhering to established HSE procedures and relevant project HSE plans.
- The Company policy implemented through a documented HSE management system. The management system will ensure that objectives are set, hazards are identified, risks assessed and control measures implemented in a systematic manner.
- The Company HSE policy, HSE management systems, procedures and objectives will be regularly reviewed to identify and implement practicable improvements, which will promote continued HSE performance improvement.
5.0 QSHE Planning

5.1 Actions to Address Risks and Opportunities

Note: Ghantoot Roads & Infrastructure Division views “uncertainty” as neutral, but defines “risk” as a negative effect of uncertainty, and “opportunity” as a positive effect of uncertainty. Formal risk management may not be utilized in all instances; instead, the level of risk assessment, analysis, treatment and recordkeeping will be performed to the level deemed appropriate for each circumstance or application.

Ghantoot Roads & Infrastructure Division considers risks and opportunities when taking actions within the management system, as well as when implementing or improving the management system; likewise, these are considered relative to products and services. Risks and opportunities are identified as part of the “Context of the Organization Exercise” defined in GTGC-RID-IMS-PRC-06 Context of the Organization, as well as throughout all other activities of the IMS.

Risks and opportunities are managed in accordance with the document GTGC-RID-IMS-PRC-01 Risk and Opportunities Management. This procedure defines how risks are managed in order to minimize their likelihood and impact, and how opportunities are managed to improve their likelihood and benefit.

5.2 QHSE Objectives and Planning to Achieve Them

As part of the adoption of the process approach, Ghantoot Roads & Infrastructure Division utilizes its process objectives, as discussed in 4.4 above, as the main management objectives for the IMS.

These include:

**Quality:** overall product-related quality objectives; project specific quality objectives that are defined in the project specific Quality Plan.

**Environmental:** shall be set from any significant aspect / impact that the organization considers that will have an effect on the environment office and site.

**Health & Safety:** shall be planned and developed through a risk based approach which includes leading and lagging objectives.

The process objectives have been developed in consideration that they:

a) be consistent with the Integrated QHSE policy;

b) be measurable;
c) take into account applicable requirements;
d) be relevant to conformity of products and services and to enhancement of customer satisfaction;
e) be monitored;
f) be communicated;
g) be updated as appropriate.

h) Expectations of the customers, employees and interested parties
i) Process, project and service delivery performances
j) Legal and regulatory requirements that are to be complied with at all times
k) Environment aspects and impacts that need to be monitored, measured and to be controlled as per the customer requirements or contractual requirements or due to regulatory requirement.
l) Hazard identification and Risk Assessments

Process objectives are defined in the minutes of management review per section 9.3 below. The planning of process QHSE objectives is defined in section 4.4 above.

We have identified all the necessary activities which are essential to achieve the overall objectives. Objectives are reviewed during the management review meetings and accordingly adjustments are made to it for the continual improvement.

6.0 Support

6.1 Resources

6.1.1 General

Ghantoot Roads & Infrastructure Division determines and provides the resources needed:

a) to implement and maintain the management system and continually improve its effectiveness

b) to enhance customer satisfaction by meeting customer requirements

Resource allocation is done with consideration of the capability and constraints on existing internal resources, as well as needs related to subcontractor and supplier expectations.

Resources and resource allocation are assessed during management reviews.
6.1.2 People

Senior management ensures that it provides sufficient staffing for the effective operation of the management system, as well its identified processes.

We ensure that all personnel employed within the organization are capable of carrying out the assigned tasks and are competent on the basis of appropriate education, training, skills, and experience. This is ensured through the job description for the position & competency matrix. Upon recruitment, induction training is planned and provided to new employees. Following topics are covered during the induction training:

- A brief about the organization and the business
- Management Structure
- Rules and regulations of the company
- Integrated Management System Policy
- Integrated Management System Procedures (Brief and to the extent required)
- Do’s and Don’ts in the country
- Records of the induction trainings are maintained by administration office.

During the course of employment with us, all employees are assessed for the training requirements at least once in a year. Training requirements are assessed by the immediate supervisor or the position which an employee reports to. General Manager identifies the training requirements for himself and department Heads at least once in a year. In addition to the above, additional training needs may be identified for any employee on case to case basis or may be necessitated due to the following:

- When an employee’s performance is not meeting the expectation.
- Due to new projects or new assignment or business requirements.
- Due to any other requirements such as promotion of the employee, legal requirements etc.

Identified trainings may be imparted internally or by participating in a training conducted externally. Internal training may be conducted by an identified individual within the company or by an appointed training body / person. For all internal trainings, attendance record shall be maintained. Additionally, training material or test papers may also be maintained as a record (wherever practicable).

For all external training, suitable records shall be maintained as appropriate. This may include certificate of participation / successful completion or any other communication confirming the actual participation.
Effectiveness of the training shall be monitored for all imparted trainings (Internal and External) to the extent possible and practicable. The effectiveness may be monitored by any of the following methods:

- By taking a report from the supervisor / reporting position on the performance of the employee(s). The report may be in the form of e-mail or in any other written form.
- By measuring and monitoring the pre-defined key performance indicator(s) or any other indicator(s).
- Wherever we appoint a contractor, it is ensured that the contractor is aware of;
- IMS policy and procedures that need to be followed at all times
- Significant environmental aspects & impacts and Hazards associated with the activities
- His roles and responsibilities to implement and maintain IMS policy and procedures.
- Potential consequences in case of deviations for not following the IMS policy and procedures.

IMS policy, procedures, environmental aspects/ impacts and hazards associated with the activities forms are an integral part of the contract.

The implementation effectiveness of the IMS policy and procedures by the subcontractor are monitored at defined frequency through surprise ON SPOT CHECKS, audits and by verification of daily tool box talk records and any other relevant records that need to be maintained as a part of contract.

### 6.1.3 Infrastructure at work

Ghantoot Roads & Infrastructure Division determines, provides and maintains the infrastructure needed to achieve conformity to product requirements. Infrastructure includes, as applicable:

a) buildings, workspace and associated facilities;

b) process equipment, hardware and software;

c) supporting services such as transport;

d) information and communication technology.

Resources are allocated against forecasted requirements and are reviewed and supplemented where necessary.

General Manager is responsible for the allocation and review of resources. Resources include:

- Office Building, Workspaces, Desks, Conducive Environment
- Computers and related Office / Account Software
- AutoCAD and Architectural 3D Software
- Servers
To keep all personnel of the organization motivated, we provided suitable supporting facilities such as communication, transportation and accommodation facilities. Infrastructure required in achieving project and service conformity such as equipment, hardware, software, workspaces and associated utilities are provided within appropriate functions. Planned preventive maintenance is carried out for the equipment which is used for projects and service delivery.

6.1.4 Environment for the Operation of Processes

Ghantoot Roads & Infrastructure Division provides a clean, safe and well-lit working environment. The Management of Ghantoot Roads & Infrastructure Division manages the work environment needed to achieve conformity to product requirements. Specific environmental requirements for products are determined during QHSE planning and are documented in subordinate procedures, work instructions, or job documentation.

Human factors are considered to the extent that they directly impact on the quality of product and project delivery. Work environment at the workplaces are maintained as appropriate for the operations and complying with the regulatory requirements.

Where appropriate, hazardous material warning and safety notices are posted. It is ensured that all personnel are wearing the appropriate personnel protective equipment at site and First Aid boxes are available. To keep the safe work environment suitable for the respective work areas, procedures and work instructions are issued to defined locations / holders for reference by personnel.

6.1.5 Monitoring and Measuring Resources

Where equipment is used for critical measurement activities, such as inspection and testing, these shall be subject to control and either calibration or verification. Calibration intervals and who is to perform the calibration are documented on the individual equipment records.

Calibrations are performed in accordance with the schedule and any equipment whose calibration period has expired is withdrawn from service. A suitable storage environment is provided and controls to allow only
authorized use. Items of HSE related measuring and test equipment such as noise meters, anemometer, etc. are also controlled by the documented procedure or as explained in the related HSE plan.

Measurement items attached to items of plant and machinery that are provided by suppliers are calibrated and tested by the supplier of the item of plant and machinery. The management and procedure of measuring and test equipment is controlled and documented in the project related and specific QHSE plans.

This procedure describes:

- How to identify and select measuring and testing equipment
- The requirements for registration of equipment
- How to document the parameters to show that equipment is capable of making measurements within the specified limits
- How to control the calibration status

Note: Calibration and measurement traceability is not employed for all measurement devices. Instead, Ghantoot Roads & Infrastructure Division determines which devices will be subject to calibration based on its processes, products and services, or in order to comply with specifications or requirements. These decisions are also based on the importance of a measurement, and considerations of risk.

6.1.6 Organizational Knowledge

Ghantoot Roads & Infrastructure Division also determines the knowledge necessary for the operation of its processes and to achieve conformity of products and services. This may include knowledge and information obtained from:

a) internal sources, such as lessons learned, feedback from subject matter experts, and/or intellectual property;

b) external sources such as standards, academia, conferences, and/or information gathered from customers or subcontractors and suppliers.

This knowledge shall be maintained, and made available to the extent necessary. When addressing changing needs and trends, Ghantoot Roads & Infrastructure Division shall consider its current knowledge and determine how to acquire or access the necessary additional knowledge. The Ghantoot Roads & Infrastructure Division’s Knowledge Center, is a one-point access for the whole organization to obtain knowledge of the IMS system and other relevant knowledge of the organization. The Knowledge Center is managed and controlled by the QHSE team lead.
6.2 Competence

Staff members performing work affecting product quality and HSE performance are competent on the basis of appropriate education, training, skills and experience. This is assessed and evaluated through recruitment, client assessment and approval when assigned to a project site, site performance observations and client feedback. QHSE training is provided at commencement of each project and upon each new joining staff member. The documented procedure in the related QHSE plans defines these activities in detail. All employees are evaluated on their performance by their superior/line manager annually. Based on the result of the evaluation is determined whether additional training is required in certain areas (*GTGC-RID-OP-FRM-24 Employee Annual Evaluation*).

*Note: the management system does not include other aspects of Human Resources management, such as payroll, benefits, insurance, labor relations or disciplinary actions.*

6.3 Awareness

Training and subsequent communication ensure that staff are aware of:

a) the Integrated QHSE policy;

b) relevant management objectives;

c) any significant environmental impact which is related or potentially associated to their works.

d) Health and safety Hazards which have been identified through a risk based approach.

e) their contribution to the effectiveness of the management system, including the benefits of improved performance;

f) the implications of not conforming with the management system requirements including not fulfilling the organization’s compliance obligations.
6.4 Communication

6.4.1 General

The organization shall ensure and maintain effective communications both internally and externally to those interested parties and any compliance obligations it may have through various communication tools.

The organization shall ensure that effective communications through a process of ‘what, when, with whom and how’ to ensure that all interested parties are kept up to date with the organization’s QHSE process were applicable.

6.4.2 Internal Communication

The management of Ghantoot Roads & Infrastructure Division ensures internal communication takes place regarding the effectiveness of the management system. Internal communication methods include:

- use of corrective action processes to report nonconformities or suggestions for improvement
- use of the results of analysis of data
- meetings (periodic, scheduled and/or unscheduled) to discuss aspects of the IMS
- use of the results of the internal audit process
- regular company meetings with all employees
- internal emails
- memos to employees

Ghantoot Roads & Infrastructure Division’s “open door” policy which allows any employee access to the Management for discussions on improving the management system

HSE Communication

The Organization’s policy concerning the occupational health and safety in the workplace is communicated to all employees and is available to all interested parties; with the main objective of ensuring that all HSE related issues are well communicated.

The internal communication concerning HSE aims to:
• Make the Organization’s policy, process, procedures and the Management’s commitment for occupational health and safety in works widely known.

• Help the organization’s employees understand the objectives and procedures

• Motivate the executives, employees, subcontractors and visitors in order to continuously improve HSE performance and the HSE Management system

• Encourage the employees to express their opinions about HSE via consultation

Within the organizations communication takes place among the various levels and functions through e-mail, memos, notice boards, and internal meetings. We use these communication channels to keep the workforce informed on our environmental performance, OH & S performance, Investigation results of incidents, or any other communication related to Integrated Management System.

In addition to above, Tool Box Talks are conducted on daily basis at site before commencement of work. Records of the tool box talks are maintained. Communication with contractors within the works place is mostly through the E-mail, Fax or in the form of letters. For all communications related to Integrated Management System, an acknowledgement is obtained. Acknowledgement may be through e-mail or by fax or in any other written form.

Visitors to our workplace are given a brief health & safety induction through printed leaflet. All visitors must read the health & safety instructions carefully. The visitor must be accompanied by a company’s representative at all times. If a visitor is visiting to our customer’s site in such cases safety induction program as required by the customer are followed. In the absence of any customer specific safety induction, our safety induction procedures would be followed.

Wherever it is necessary to wear certain PPE (Such as Helmets, Ear Plugs, Safety Shoes, Goggles, High visibility vest etc.) would be provided by us in accordance to the legal requirements.
6.4.3 External Communication

We have an effective system for communication with customers. Information about the range of services offer is being given to the client by:

1) meeting client personnel

2) submitting pre-qualification dossier.

During tenders, all communications and clarifications are addressed to relevant personnel indicated in the tender documents. During contract execution, the Project Manager becomes the focal point of all communications with the client. All correspondence is therefore routed through the Project Manager.

Co-ordination procedure for submissions and correspondence as operated by clients is complied with. Amendments and variations in contracts are normally agreed in writing. Where verbal instruction is given, this will be confirmed in writing to the client.

Customer’s feedback on our performance and areas requiring improvement is obtained by requesting Client to complete the Customer Feedback Survey Questionnaire upon handing over of the project. Customer complaints with respect to project or system non-compliance are attended to immediately. General Manager has the prerogative on whether or not to communicate information’s related to the significant aspects and impacts of the organization. If the decision is to communicate, the views and needs of the interested parties are considered and appropriate procedure/method is followed.

All external communication must be approved by the related management or its delegated representative. All communication shall be recorded for reference purpose.

The external communication regarding HSE legal requirement / local municipality is conducted by the Management or the QHSE team.

6.4.4 HSE Consultation and Participation of Workers

Consultation is an important factor within the organization as well as the participation of workers related to the concerned processes, as it acts as a two-way communication in relation to risk identification, assessment and
control. The consultation must be effective and implemented in way that all personnel understand their responsibilities, to ensure they comply with both the HSE system procedures and regulatory requirement.

While performing the aspect & impact analysis, and risk assessments involvement of all employees are ensured. Employee representative is elected by the workers to represent them on all matters related to OH&S. Employee representative is a member of the steering committee. We have implemented a monthly suggestion scheme to ensure that all employees participate in the OH&S related matters. Best suggestion of the month is reviewed for implementation and implemented accordingly.

Whenever there occurs a change in procedure due to incident, legislation changes, customer complaints, or complaints from the interested parties or in policy, such changes shall be communicated to contractors. An acknowledgment shall be obtained from the contractor to this effect.

Wherever necessary and practicable, interested parties shall be consulted in OCCUPATIONAL HEALTH & SAFETY (OH & S) matters.

6.5 Documented Information

The management system documentation includes both documents and records.

The extent of the management system documentation has been developed based on the following:

- a) The size of Ghantoot Roads & Infrastructure Division
- b) Complexity and interaction of the processes
- c) Risks and opportunities
- d) Competence of personnel
- e) HSE legal and other requirements.

The purpose of document control is to ensure that staff have access to the latest, approved information, and to restrict the use of obsolete information. All documented procedures are established, documented, implemented, maintained and made accessible to concerned staff through Ghantoot Roads & Infrastructure Division’s Knowledge Center.

A documented control procedure is established in each project specific QHSE plan to define the controls needed for the identification, storage, retrieval, protection, retention time, and disposition of QSHE and other project
records. This procedure also defines the methods for controlling records that are created by and/or retained by subcontractors and suppliers.

These controls are applicable to those records which provide evidence of conformance to requirements; this may be evidence of design requirements, contractual requirements, procedural requirements, or statutory/regulatory compliance. In addition, QSHE records include any records which provide evidence of the effective operation of the management system. On some project sites an electronic document management system is used in the daily operations and electronic documents are deemed valid submittals depending on client agreement.

7.0 QSHE Operation

7.1 Operational Planning and Control

Ghantoot Roads & Infrastructure Division plans and develops the processes needed for realization of its roads and infrastructure construction and delivery. Planning of roads and infrastructure construction realization is consistent with the requirements of the other processes of the management system. Such planning considers the information related to the context of the organization (see section 2.0 above), current resources and capabilities, project requirements.

Such planning is accomplished through:

a) determining the requirements for the delivery of roads and infrastructure construction projects;

b) establishing criteria for the processes and the acceptance of roads and infrastructure construction requirements;

c) determining the resources needed to achieve conformity to the roads and infrastructure construction delivery requirements;

d) implementing control of the processes in accordance with the criteria;

e) determining, maintaining and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned and to demonstrate the conformity of the roads and infrastructure construction to their requirements;

f) adopt a life cycle management culture were applicable through the aspect and impact assessment;

g) the design and development of all Ghantoot Roads & Infrastructure Division products and services that ensure to have a minimal impact on the environment;

h) ensuring that all materials, services and subcontractors and suppliers have minimal impact on the
environment where applicable.

i) Communicate relevant environmental information to interested parties that may have a significant impact.

j) Ensure that adequate planning is conducted for health and safety prior to work commencing.

k) Provide a HSE plan for project execution

l) Risk assessment shall be conducted with adequate control measures in place where required.

m) Ensure adequate resources are available to conduct the task.

Outsourced processes and the means by which Ghantoot Roads & Infrastructure Division controls them are defined in the documented procedure *GTGC-RID-OP-PRC-03 Outsourcing Procedure*

### 7.2 Requirements for Products and Services

#### 7.2.1 Customer Communication

Ghantoot Roads & Infrastructure Division has implemented effective communication with customers in relation to:

a) providing information relating to the construction of roads and other infrastructure elements;

b) handling enquiries, contracts or orders, including changes;

c) obtaining customer feedback relating to products and services, including customer complaints;

d) handling or controlling customer property;

e) establishing specific requirements for contingency actions, when relevant.

#### 7.2.2 Determining the Requirements Related to Products and Services

During the intake of new business Ghantoot Roads & Infrastructure Division captures:

a) requirements specified by the customer, including the requirements for delivery and post-delivery activities;

b) requirements not stated by the customer but necessary for specified or intended use, where known

c) statutory and regulatory requirements related to the construction of roads and other infrastructure elements;

d) any additional requirements determined by Ghantoot Roads & Infrastructure Division.
7.2.3 Review of Requirements Related to Products and Services

Once requirements are captured, Ghantoot Roads & Infrastructure Division reviews the requirements prior to its commitment to deliver the contract for roads and infrastructure construction. This review ensures that Ghantoot Roads & Infrastructure Division has the capability and capacity to:

a) meet all requirements specified by the customer, including requirements for delivery and post-delivery activities;
b) meet any requirements not stated by the customer, but which Ghantoot Roads & Infrastructure Division knows as being necessary;
c) meet all requirements determined necessary by Ghantoot Roads & Infrastructure Division itself;
d) meet all related statutory and regulatory requirements;
e) meet any contract or order requirements differing from those previously expressed (i.e., from a previous Ghantoot Roads & Infrastructure Division tender bid).

7.2.4 Changes to Requirements for Products and Services

Ghantoot Roads & Infrastructure Division updates all relevant requirements and documents when the requirements are changed, and ensures that all appropriate staff are notified. This is explained in the project specific QHSE plan, document control that comprehends RIF’s, revised drawings and superseded drawings, revision control and distribution as well as method of document management system, as some project sites work with electronic documents management system in daily operations.

7.3 Design and Development of Products and Services

For new designs and for significant design changes, Ghantoot Roads Division ensures the translation of customer needs and requirements into detailed design outputs. These address performance, reliability, maintainability, testability, and safety issues, as well as regulatory and statutory requirements.

This process ensures:

a) Design planning is conducted
b) Design inputs (requirements) are captured
c) Design outputs are created under controlled conditions
d) Design reviews, verification and validation are conducted
e) Design changes are made in a controlled manner.

These activities are further defined in the related project QHSE plan and the process is owned by the site based
technical/ engineering in charge.

7.4 Procurement and Control of Externally Provided Processes, Products and Services

Ghantoot Roads Division ensures that purchased materials, or other subcontracted services conform to specified procurement requirements. The type and extent of control applied to the supplier/subcontractor and the procured products or services are dependent on the effect on the product delivery.

Ghantoot Roads & Infrastructure Division evaluates and selects suppliers and subcontractor based on their ability to supply products and services in accordance with the project and contract requirements, the organization's QSHE requirements, that of ISO 9001:2015, 14001: 2015 and 45001:2018 and environmental and municipal requirements. Criteria for selection, evaluation and re-evaluation are established.

Procurements are made via the release of formal purchase orders, LPO's or contracts which clearly describe what is being procured and the terms of delivery and installation. Received products or services are then verified against requirements to ensure satisfaction of requirements. Suppliers and subcontractors who do not provide conforming products or services will be rejected and requested to conduct formal corrective action.

These activities are further defined in the documents GTGC-RID-OP-PRC-04 Procurement & Asset, GTGC-RID-OP-PRC-03 Outsourcing Procedure, GTGC-RID-OP-PRC-02 Material Handling & Storage and in the material handling and storage procedure in the project specific QHSE plan.

7.5 Production and Service Provision

7.5.1 Control of Production and Service Provision

To control its provision of construction of roads and infrastructure, Ghantoot Roads & Infrastructure Division considers, as applicable, the following:

a) the availability of documents or records that define the characteristics of the construction of roads and infrastructure as well as the results to be achieved;

b) the availability and use of suitable monitoring and measuring resources;

c) the implementation of monitoring and measurement activities;

d) the use of suitable work infrastructure and environment;

e) the appointment of competent persons, including any required qualifications;

f) the validation and revalidation of special processes if applicable (see below);

g) the implementation of actions to prevent human error;
h) the implementation of release, delivery and post-delivery activities.

If no in-house special processes are present but done by suppliers/subcontractors:

At this point, Ghantoot Roads & Infrastructure Division does not utilize any in-house “special processes” where the result of the process cannot be verified by subsequent monitoring or measurement. Any such special processes are sent to outside supplier/subcontractor, and controlled as an outsourced process per GTGC-RID-OP-PRC-03 Outsourcing Procedure.

During the execution of the project a documented Inspection and Test Plan is developed for each construction activity. This document describes the relevant steps involved in the quality related checks, inspection and testing and highlights any formally recorded checks that are necessary.

Raw materials are subject to receiving inspection to verify that the order requirements have been met, including the submission of the required quality documentation, in accordance with the developed ITP.

The project specific quality plan details the requirements for inspection and testing and control of quality during construction and delivery of project.

7.5.2 Identification and Traceability

Where appropriate, Ghantoot Roads & Infrastructure Division identifies its construction elements or other critical process outputs by suitable means. Such identification includes the status of the construction element with respect to monitoring and measurement requirements.

If unique traceability is required by contract, regulatory, or other established requirement, Ghantoot Roads & Infrastructure Division controls and records the unique identification of the construction elements.

The documented procedure for material handling and storage in each project specific QHSE plan defines these methods in detail.

7.5.3 Property Belonging to Customers or External Providers

Ghantoot Roads & Infrastructure Division exercises care with customer or supplier property while it is under the organization’s control or being used by the organization. Upon receipt, such property is identified, verified, protected and safeguarded. If any such property is lost, damaged or otherwise found to be unsuitable for use, this is reported to the customer or supplier and records maintained.
For customer intellectual property, including customer furnished data used for design, production and / or inspection, this is identified by customer and maintained and preserved to prevent accidental loss, damage or inappropriate use.

7.5.4 Preservation

Ghantoot Roads & Infrastructure Division preserves conformity of product or other process outputs during internal processing and delivery. This preservation includes identification, handling, packaging, storage, and protection. Preservation also applies to the constituent parts of a product.

The documented procedure in the project specific QHSE plan defines the methods for preservation of product.

7.5.5 Post-Delivery Activities

As applicable, Ghantoot Roads & Infrastructure Division conducts the following activities which are considered “post-delivery activities”:

- Customer Satisfaction Survey
- Repair of defect claims or warranty
- Final document handing over
- Photograph the completed project, if possible

Post-delivery activities are conducted in compliance with the management system defined herein. In determining the extent of post-delivery activities that are required, Ghantoot Roads & Infrastructure Division considers:

a) statutory and regulatory requirements;
b) the potential undesired consequences associated with its construction delivery products;
c) the nature, use and intended lifetime of its of construction products;
d) customer requirements;
e) customer feedback.

Note: post-delivery activities is separate from the project close out and handing over process. The project close-out and handing over process is defined in the project specific Quality plan in accordance with client and contractual requirements.
7.5.6 Control of Changes

Ghantoot Roads & Infrastructure Division reviews and controls both planned and unplanned changes to processes to the extent necessary to ensure continuing conformity with all requirements.

The change management process below allows an effective response to change and to facilitate contingency plans for any anticipated change. Once a change is identified, evaluation is carried out in order to assist with the decision-making process. Evaluation steps include assessment and optimum selection of change.

The QHSE team will ensure that all persons affected by the change are made aware of and understand the changes in requirements, procedures and applicable control measures. Awareness will take the form of training, HSE talks, induction updates and any other effective means deemed appropriate.

Change Management Process
7.6 Release of Products and Services

Acceptance criteria for project delivery are defined in appropriate subordinate documentation. Reviews, inspections and tests are conducted at appropriate stages to verify that the requirements have been met. This is done before services are delivered.

7.7 Control of Nonconforming Outputs

Ghantoot Roads & Infrastructure Division ensures that any construction activity, product or other process outputs that do not conform to their requirements are identified and controlled to prevent their unintended use or delivery.

*See 10.2 non-conformity and corrective action.*

8.0 Performance Evaluation

8.1 Monitoring, Measurement, Analysis and Evaluation

8.1.1 General

Ghantoot Roads & Infrastructure Division has determined which aspects of its integrated management system must be monitored and measured, as well as the methods to utilize and records to maintain, within this Integrated Management System Manual and subordinate documentation.

Monitoring and measurement of the processes, as defined in 4.4 above, ensure that the management and the QHSE team evaluates the performance and effectiveness of the integrated management system itself.

All major HSE incidents or lost time injuries undergo an investigation to identify the root cause of the incident.

From relevant records, statistical data is produced that is used for the monitoring of the HSE objectives, targets and control measures, and the effectiveness of corresponding corrective and preventive actions taken.

Ghantoot Roads & Infrastructure Division collates weekly or monthly performance evaluation through QHSE meetings, progress reports and QHSE objectives reporting to monitor the effectiveness of the system, and compliance to applicable Legislation and other requirement.
8.1.2 Customer Satisfaction

As one of the measurements of the performance of the management system, Ghantoot Roads & Infrastructure Division monitors information relating to customer perception as to whether the organization has met customer requirements. Corrective actions system shall be used to develop and implement plans for customer satisfaction improvement that address deficiencies identified by these evaluations, and assess the effectiveness of the result.

See further GTGC-RID-OP-PRC-12 Customer feedback and Complaint procedure

8.1.3 Analysis and Evaluation

Ghantoot Roads & Infrastructure Division analyzes and evaluates the data and information arising from monitoring and measurement in order to evaluate:

a) conformity of products and services;

b) the degree of customer satisfaction;

c) the performance and effectiveness of the integrated management system;

d) if planning has been implemented effectively;

e) the effectiveness of actions taken to address risks and opportunities;

f) the performance of external providers;

g) the need for improvements to the integrated management system.

Statistical techniques used may be defined in appropriate documented procedures; in all cases, the methods are based on established standards or are otherwise determined to be statistically valid.

Ghantoot Roads & Infrastructure Division utilizes methods for the analysis of appropriate data collected to demonstrate the suitability and effectiveness of the management system. The method of analysis is referenced in graphs or diagrams. This aspect of the system is subject to management review.

8.1.4 Evaluation of HSE Compliance

We have established objectives to measure the OH&S performance. Appropriate performance indicators are put in place. Verification is done through the internal audits. Performance measures are reviewed in the Management review meeting. The correction and corrective action shall be taken if the results are not achieved. We have registered the HSEMS in compliance with Abu Dhabi Occupational Safety and Health System
Framework (OSHAD SF). Ghantoot Roads & Infrastructure Division shall report its quarterly HSE performance to authority via the OSHAD regular review form.

A detailed master register of legal & regulatory and other requirements is maintained to demonstrate our commitment to comply with all the applicable legal & regulatory requirements and other requirements. The compliance to the same is verified through the periodical checks & through the internal audit at work place.

The verification of compliance to be checked by an employee having adequate knowledge about the legislative requirements or trained on legislative and other requirements.

Compliance report shall be submitted to the management upon such verification. Wherever deviations are observed, the NC’s shall be raised. Appropriate corrective and preventive action shall be planned by the respective head of the department and NC to be closed. The effectiveness of the corrective action shall be verified by the Management Representative. The compliance report is discussed in the Management review meeting. (*GTGC-RID-HSEMS-MAN-02*)

8.2 Internal audit

Ghantoot Roads & Infrastructure Division conducts internal audits at planned intervals to determine whether the management system conforms to contractual and regulatory requirements, to the requirements of ISO 9001, ISO 14001 & ISO 45001, and to management system requirements. Audits also seek to ensure that the management system has been effectively implemented and is maintained.

The results of these audits provide the basis for the reports to senior management for their management review of the system.

Trends determined from analysis of corrective action requests, non-conformance reports and similar indicators of system performance are also used to maintain and develop the system. Staff are encouraged to suggest improvements at any time.

Internal audits are controlled by a documented procedure and are conducted in accordance with the prepared annual schedule.

Site Specific internal audits including internal audits of subcontractors, are explained in the internal audit procedure in the relevant project specific QHSE plan.
8.3 Management Review

In the management review meeting, the top management and the QHSE team review the integrated management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. The review includes assessing opportunities for improvement, and the need for changes to the management system, including the Integrated QHSE Policy and quality, health, safety, and environmental objectives. The management review meetings are held at least once a year and whenever deemed necessary.

Records from management reviews are maintained. *(GTGC-RID-IMS-PRC-13 Management Review)*

9.0 Improvement

9.1 General

Ghantoot Roads & Infrastructure Division uses the management system to improve its processes, products and services. Such improvements aim to address the needs and expectations of customers as well as other interested parties, to the extent possible.

Improvement shall be driven by an analysis of data related to:

The results of analysis shall be used to evaluate:

- a) conformity of products and services;
- b) the degree of customer satisfaction;
- c) the performance and effectiveness of the management system;
- d) the effectiveness of planning;
- e) the effectiveness of actions taken to address risks and opportunities;
- f) the performance of external providers;
- g) other improvements to the management system

9.2 Nonconformity and Corrective Action

Ghantoot Roads & Infrastructure Division takes corrective action to eliminate the cause of nonconformity in order to prevent recurrence.
The control of non-conformances and corrective action are detailed in each project QHSE plan specific to that project. Non-conformances issued by Clients on a project site are not viewed as customer complaints, but a normal part of the operation process and are recorded as external NCR log on site.

All internally and externally raised non-conformance reports, and their supporting documentation, are controlled by the QHSE team on site through logs, and are reviewed for close out and trends. Identified NCR’s are subject to Root Cause Analysis and proposed corrective action.

Likewise, the company takes corrective action to eliminate the causes of potential nonconformities in order to prevent their reoccurrence and uses site observation to emphasize that.

Ghantoot Roads & Infrastructure Division is committed to continue improving the below areas as an ongoing vision. – THE LIST IS INFINITE: -

- Increasing Customer Satisfaction
- Reducing Project Cost
- Reducing Project Timescales
- Improving Built Quality
- Reducing Environmental Impact
- Increasing Productivity
- Accident Reduction
- Reduction in Non-Conformance
- Reduce HSE incidents

9.3 Continual improvement

Through the process effectiveness review, done as part of Management Review, Ghantoot Roads & Infrastructure Division works to continually improve the suitability, adequacy and effectiveness of the integrated management system. This includes seeking opportunities for improvement.

It is the policy of Ghantoot Roads & Infrastructure Division to continually seek ways to improve the effectiveness of the management system and operations through the review of policies, processes, objectives, audit results, analysis of data, correctives and preventive actions and management review.

It is the responsibility of each manager to review and processes and functions with this staff to correct deficiencies and to find opportunities for improvement.

Everyone within the business has the opportunity to put forward improvement suggestions.
10.0 HSE Risk Management

10.1 General

The organization has developed a risk management system which includes a two-tier process;

Tier one includes risk and opportunities which is at the high level of both business risk and opportunities and is controlled through the *GTGC-RID-IMS-PRC-01 Risk and Opportunities Management*

Tier two level deals with operational day to day HSE risk management and is controlled through the *GTGC-RID-HSEMS-PRC-14 Hazard & Risk Management*

10.2 Environmental Aspects and Impacts

Our objective is to Eliminate, Reduce, Isolate, and Control (ERIC)

The environment Aspects and Impacts are measured on the significance of importance by giving a numerical value and colour sequence during the assessment:

<table>
<thead>
<tr>
<th>Condition</th>
<th>Value</th>
<th>Colour</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Conditions</td>
<td>1 – 2</td>
<td>Green</td>
<td>Acceptable</td>
</tr>
<tr>
<td>Medium Conditions</td>
<td>3 – 5</td>
<td>Yellow</td>
<td>Tolerable</td>
</tr>
<tr>
<td>High Conditions</td>
<td>6 – 9</td>
<td>Blue</td>
<td>Moderate</td>
</tr>
<tr>
<td>High Conditions</td>
<td>10 – 15</td>
<td>Grey</td>
<td>Substantial</td>
</tr>
<tr>
<td>Very High Conditions</td>
<td>16 – 25</td>
<td>Red</td>
<td>Unacceptable</td>
</tr>
</tbody>
</table>

**Environmental Impact and Mitigation Measures**

Regular monitoring is required during construction to determine whether environmental standards and regulations are being complied with.

**Air Quality**

During construction, air quality and the occupational health of working labourers can be impacted by the generation of dust (particulate matter and total suspended particulates), and to a lesser extent, air emissions, which include combustion and exhaust gases of NO2 and SO2.

As long as the proper precautions and control measures to minimise air emissions of NO2 and SO2 are carried out, including the regular inspection and maintenance of all construction machinery, the impact will be minimal. Additionally, since the impact is expected to be temporary and localised to the project area, only visual observations of heavy smoke or fumes, indicating a strong release of combustion and exhaust gases will be required during construction to monitor these air emissions.
The following sources shall be in compliance with maximum allowable limits set forth in Decree No.(12) of 2006: Regulation concerning protection of air from pollution.

- All stationary sources
- All hydrocarbon fuel combustion sources
- All solid waste incinerators; and
- All hazardous and medical waste incinerators.

It should also be noted that if any odour complaints were made during construction, appropriate odour monitoring will be carried out.

Noise

EAD’s recommended noise limits for construction is advised at around 92 dB(A) 15 meters away from equipment and machinery, and 80 dB(A) at the site boundary. The purpose of noise monitoring will be to check compliance of these limits during construction. Noise monitoring should be measured for activities with high noise impacts, activities in close proximity of sensitive receptors, or in the case of noise complaints (being non-compliance). It is proposed to monitor these locations once a month, or after receiving a complaint.

Ghantoot will strictly adhere to OSHAD SF CoP 3.0 occupational noise and Annexure “N” and EAD requirements to ensure compliance and to implement an effective hear conservation program.

Noise monitoring would be conducted continuously at each determined location during normal construction works. In order to achieve representative conditions, monitoring will be taken on a typical weekday, not on a weekend or public holiday.

All noise monitoring equipment used is of type 1 sound meter compliant with the relevant standards and is within manufacturer’s calibration. Equipment has to be calibrated before and after monitoring, and any drift recorded. Measures have to be taken to avoid interference from background noise levels.

Soil and Groundwater

Appropriate control measures must be employed to prevent contamination of the groundwater. As part of the environmental management requirements of Ghantoot, groundwater quality within the site and camp should be regularly monitored during construction.

Additionally, in the event of a non-compliance or contamination incident, and after the appropriate incident response procedures and contingency plan are in place, emergency soil and groundwater monitoring will also be
conducted. The parameters to be tested will be determined by the nature and scale of the spill or leak to the ground.

**Fuel**

The consumption of fuel at site and camp is tracked from the purchase records i.e. fuel pump station invoices and weight slips (if purchased in bulk quantities). Weekly the fuel consumption data is obtained from the purchase department and recorded in the weekly statistic.

- Tips to minimize fuel consumption
- Equipment, machinery and plant should be in good operating condition and maintained free of leaks,
- Drive only when needed
- Keep the windows closed.
- Minimize air conditioning.
- Replace dirty air filters.
- Maintain proper tire inflation

**Water**

Non-drinking water consumption is monitored from the number of water tankers of known capacity used/offloaded at site and camp. A designated supervisor is assigned to count the number of trips made by water tankers. Drinking water consumption is tracked from the units (cubic meter) consumed. The water consumed is calculated and recorded in weekly statistics.

A prerequisite for understanding how to reduce water usage on construction sites is to have a clear understanding of where water is used, how much is used, where water is being wasted and what behaviours and/or technologies can be introduced to successfully reduce water wastage.

The first and immediate priority for reducing water use on construction sites is to eliminate/minimize water wastage.

- Improve efficiency of water using processes
- Offset consumption of mains water with alternative sources such as water from lagoons.
- Water efficient bathroom products and taps should be installed.
- Water meter adapter / add-on
• Auto shut-off taps.

• Ensure water supply able to be switched off at point of use e.g. through trigger guns on hoses.

• Auto shut-off taps (e.g. trigger type hoses/taps)

• Use temporary settlement lagoons and look at early construction of lagoons so that they can be utilized early.

• Milling materials to be spread on access roads.

• Recovery of water for re-use of lorry washouts

**Electricity**

As currently diesel driven generator are used to supply power to all site. Therefore, no such systems are implemented to monitor the consumption of electricity. However, efforts are made for installation of energy efficient products at site and site offices. Some other tips are:

- maximizing natural day light by using natural light instead of overhead or fluorescent light.
- Normally work is executed in day time only.
- Use of low voltage products.
- Adjusting thermostat in the offices based on season.

**Handling & Storage of Materials**

The handling and transportation of material is carried out in accordance with the manufacturer’s normal methods or recommendations to prevent any damage or deterioration to that material.

Where appropriate, specific documentation, e.g. drawings, sketches or work instructions shall be established for unusual handling and / or transport operations in accordance with the manufacturer recommendations. Only trained personnel shall operate Heavy Lifting Equipment.

Storage is organized in order to ensure that materials or equipment received on site do not deteriorate or become damaged prior to installation.

Storage areas are inspected on regular basis to assess the conditions of the stored items. The list of the stored perishable goods (construction elements, sealants and paints) shall be established and maintained. Work instructions shall be given in order to:

a) Store materials in appropriate environment.
b) Avoid the incorporation of materials beyond their expiry dates.

c) Identify and control dangerous and toxic materials.

Authorized personnel shall requisition materials issued for use in the permanent works and records of the issue shall be maintained. Where equipment is required to be maintained whilst in storage, a schedule of preservation measures shall be established. *(GTGC-RID-HSEMS-MAN-02)*

**Environment and Waste Management**

Ghantoot Roads & Infrastructure Division shall consider the control measures to minimise waste as well as ensure the proper management and disposal of all solid and liquid waste generated during construction are provided in this control plan.

The following hierarchy for waste management is always preferred:

- Waste avoidance and/or reduction.
- Reuse.
- Recycle.

Diverting the waste stream in these ways means that waste storage, treatment and disposal options can be reduced. Minimizing the amount of waste on site not only protects the environment but it has the potential to cut down costs that may be incurred by Ghantoot or the proponent for handling and disposing of the waste. Construction sites should pursue this hierarchy and seek out waste minimization opportunities first and foremost, followed by proper waste storage and disposal.

Based on Ghantoot Roads & Infrastructure’s scope of construction activities, the two main categories of waste which are expected to be generated during construction works include:

- Non-hazardous waste such as paper, packaging and boxes, kitchen and office waste, cardboard, scrap metal, piping, etc.
- Hazardous waste such as oil and lubricants, paint, batteries, cans and small drums, filters, etc.

For the environmental control measures refer to *GTGC-RID-HSEMS-MAN-02*

**10.3 Hazard identification and Assessment of Risk and Opportunities**
Ghantoot Roads & Infrastructure Division line management are responsible for ensuring that formal action is taken to identify hazards, assess risks and implement suitable control measures for all activities for which they are responsible.

Each site/facility owned or operated by Ghantoot Roads & Infrastructure Division or location where Ghantoot Roads & Infrastructure Division carry out their duties and activities must have a Risk Assessment Procedure, which covers identification of health, safety and environmental hazards and assessment of risks at a level of detail appropriate for the site and which takes into account the specific requirements of applicable local regulations. As a minimum, this procedure must include:

Carry out tour of the facility/site identifying potential hazards including: sources of fuel for a fire; fire ignition sources such as electrical equipment; escape route blockage; unguarded equipment; poor housekeeping; potential for pollution etc.

Review presence and condition of protective systems such as fire detection and protection equipment and associated maintenance records.

As low as reasonably practicable, take action to (in order of preference):

- Eliminate the hazard
- Prevent incidents occurring
- Protect people should any incident occur
- Reduce the consequences of an incident
- Identify users of non-renewable resources (materials and energy) and review potential for improvements, including the use of recyclable consumables.
- Formally record actions taken in a risk assessment report.
- Review of the Risk Assessment Procedure to confirm it remains appropriate for the site and is up to date.
- Repeat the process as often as appropriate for the site, but at least once every 6 months or if there is a significant change to operation.
The responsibility for ensuring preparation, maintenance and implementation of the Risk Assessment Procedure is that of the Project Manager at each location. It is the responsibility of the Project Manager to ensure that the documented HSE objectives are met.

This will involve monitoring of relevant activities, inspecting and auditing and ensuring that non-conformance is dealt with in a timely manner.

**Risk Assessment**

Risk assessment must be done by the concerned Engineer/Supervisor using the appropriate format and reviewed by the HSE Officer. The records must be maintained by the HSE Officer for Client's Audit and future requirements.

Risk Assessment meeting will be held prior to start the work on site with all site engineers, foremen, equipment and work shop representative to explain the project risk assessment related to Ghantoot Roads & Infrastructure Division and control measures required to minimize and control the risk (HSE Manager will lead that meeting).

All site engineers and foremen shall receive copy of the risk assessment for implementation. Safety measures shall be explained to work force during the site safety talks by all site engineers and foremen, to let the work force aware about the hazards and control measures required at site.

In case of any future activity, specific risk assessment shall be produced on site prior to start the work. Site HSE inspection and audits shall be conducted to make sure that all safety measures in place and properly maintained.

**Hazard Classification**

Hazards are classified as Extreme, High (H), Medium (M) and Low (L) to describe potential severity in the event of an incident.

"Extreme" - A condition or practice likely to cause fatalities or permanent disability, loss of life or body part and/or extensive loss of structure, equipment or material. Work can't be continued until reduce the risk to an acceptable level.
"High" - A condition or practice likely to cause permanent disability, loss of body part and/or extensive loss of structure, equipment or material.

"Medium" - A condition or practice likely to cause serious injury or illness (resulting in temporary disability) or property damage that is disruptive, but less severe than "High".

"Low" - A condition or practice likely to cause minor (non-disability) injury or illness or non-disruptive property damage.

Risk assessment must be done prior to any activity and corrective and protective action taken. (*GTGC-RID-HSEMS-MAN-02*)

**7 Step Hazard Identification and Assessment of Risk**

<table>
<thead>
<tr>
<th>Steps 1 - 7</th>
<th>Stage 1 Hazard Identification</th>
<th>Stage 2 Risk Assessment</th>
<th>Stage 3 Risk Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Identify sources of hazard and their causes.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Analyse how and why the hazard could occur.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Analyse the consequences of the risks.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Consider likelihood of the hazard and estimate the risk.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 Judge the acceptability of the risk.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 Decide risk control options and implement selected controls.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 Monitor risk control options.</td>
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<td></td>
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</tr>
</tbody>
</table>

**Risk Matrix**
### 10.4 Compliance obligations

The HSE team is responsible for collecting, maintaining and updating the respective legislation, regulations and other relevant documents concerning HSE issues applicable to the organization’s activities.

The procedure defines the process for obtaining, assessing and ensuring that requirements of the legislation and incorporated into the relevant procedures, or where necessary, formulated into new procedures and added to the IMS.

Compliance obligation shall be conducted at irregular intervals through inspections and audits to ensure compliance are being implemented. A legal compliance register will be recorded, monitored and reviewed.

### 10.5 Emergency preparedness and response

It is very important that emergency response procedure will be communicated, implemented, and regularly tested. A good emergency response procedure saves lives and protects company assets. The main objective of

<table>
<thead>
<tr>
<th>Probability</th>
<th>Severe (Consequence)</th>
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<tbody>
<tr>
<td></td>
<td>Insignificant (1)</td>
</tr>
<tr>
<td>Rare (1)</td>
<td>1</td>
</tr>
<tr>
<td>Possible (2)</td>
<td>2</td>
</tr>
<tr>
<td>Likely (3)</td>
<td>3</td>
</tr>
<tr>
<td>Often (4)</td>
<td>4</td>
</tr>
<tr>
<td>Frequent (5)</td>
<td>5</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Risk Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>15-25</td>
<td>Extreme Risk (E): Do not allowed to continue the work until reduce the risk to acceptable level.</td>
</tr>
<tr>
<td>8-12</td>
<td>High Risk (H): Immediate action required for eliminating the hazard according to the detailed EHS Assessment.</td>
</tr>
<tr>
<td>4-6</td>
<td>Moderate Risk (M): Execution can be proceed subject to the re-assessment and required modification for further reducing the risk.</td>
</tr>
<tr>
<td>1-3</td>
<td>Low Risk (L): No further action required unless escalation of risk is possible.</td>
</tr>
</tbody>
</table>
this procedure is to prevent, lessen, and manage foreseeable emergencies. The main priority in tackling with emergencies is not to endanger the personnel safety of the people involved.

**Purpose:**

- Avoid or limit the impact of the emergency to personnel, property and the environment.
- Increase and effectively maintain an organizational framework and the environment.
- Provide a list of actions, which much is taken in an emergency with clear instructions.
- Assign and authorize personnel responsible for taking specific responsibilities and instructions.
- Provide communication channels essential to co-ordinate within the project and externally with appropriate emergency service.
- Affix the emergency plans with detailed emergency numbers shall be displayed on different areas of the site. The project HSE Engineer shall coordinate with the project manager for conducting the Emergency drills on site, the Fire Drill shall be conducted on quarterly basis. Training for emergency purpose shall be conducted as per training matrixes The Emergency exit and necessary details shall be included on induction talk. The project Manager is responsible for all emergency procedures on site and HSE Engineer will look after and schedule the events like Emergency preparedness training and awareness training

**Objective:**

The need of a planned emergency response procedure is declared and proper training and drill are conducted to each employee to have a significant role to play in fulfilling the goals of the health, safety and environment policy of Company.

During construction, there are many activities which present high risk. Many of these activities are planned and controlled. However, in emergency situations incidents have already escalated and the situation requires the controlled management of workers, staff and subcontractors with a planned series of actions and events to reduce the severity of an incident or emergency.

Fire is the most significant emergency risk but we also need to consider the response to other emergencies such as medical emergency, environmental emergency, equipment failure emergency etc. *(GTGC-RID-HSEMS-MAN-02)*

10.6 HSE Incident Reporting & Investigation

**Purpose:**
To ensure that all incidents are reported, recorded and analyzed, and that corrective action is taken to prevent recurrence.

To ensure that such reporting is done through a coherent system that would give the management all appropriate tools to efficiently monitor HSE performances, and to perform relevant systematic analysis of reported incidents.

Incident Management

1) Immediately assess the seriousness of the situation.
2) Eliminate and contain hazards. If necessary, remove non-essential personnel on area of danger.
3) Provision of First Aid as soon as possible
4) Call ambulance immediately, if a life threat occurs.
5) Secure the area
6) Find out where the injured person(s) was taken
7) Inform the Project Manager. Project Manager shall inform the Client immediately.

Incident Notification

Ghantoot Roads & Infrastructure Division shall officially notify Sector Regulatory Authority(SRA) within 24 hours of an incident occurring at a work place which result in following incident types (Reportable Incidents)

- Fatality
- Reportable Serious Injury
- Reportable Dangerous Occurrence
- Receipt of a written diagnosis or other knowledge of the occurrence of reportable Occupational illness or Disease arising out of and in the course of work
- Major or moderate Environment Incident

Ghantoot Roads & Infrastructure Division shall officially notify of relevant incidents by completing and submitting OSHAD Incident Notification Form– Form G – (as a minimum) within maximum of 24 hours in case of fatality and 03 working days for other serious injuries, as soon as practicable through the HSE emergency Contact Hot line – 800 555

Depending upon the magnitude of incident Ghantoot Roads & Infrastructure Division shall notify to other relevant authorities. (eg. Ministry of Labour, AD police, OSHAD, etc.)
Depending upon the contractual or other obligation Ghantoot Roads & Infrastructure Division may require reporting HSE performance and Incidents to other relevant stake holders (eg. Client, relevant authorities).

Incident Reporting & Investigation

The following steps present the incident reporting process, incident form shall be filled out by the HSE officer:

Step 1: Incident Classification – reporter have to determine whether it is Incident, Near Miss or Dangerous Occurrence. (Check the definition of each classification). Box shall be ticked by reporter. e.g. for an incident resulted in medical treatment case for an employee, reported shall tick the boxes of incident and MTC.

Step 2: Severity Classification – this will be the actual and potential severity to People, Assets, Environment or Reputation. A Near Miss shall always have a zero-actual severity but the potential severity could equal or greater than 2.

Step 3: Injured persons – state the name, employer, trade, I.D. No., Employee no., Nationality, age and gender. (if multiple persons are injured, get the exact number and provide a list.)

Step 4: Summary of incident – an abstract of the incident

Step 5: Details of Incident – what was done, where, by whom, how, PTW reference

Step 6: Immediate action taken to eliminate the Incident: an action to secure the area of the incident such as Stopping an activity near or within the vicinity of the incident until corrective actions are in place, permit to work system, or thorough inspections.

Step 7: Causes of Incident – to find out the underlying and immediate causes

Step 8: Further Recommendations to prevent recurrence in future: a further corrective action included but not limited to:

1. Housekeeping
2. Tool Box Talks
3. Regular Inspections
4. Safe systems of work to be followed
5. Permit to Work System
6. Information, Instructions, Training & Supervision
7. Equipment Maintenance
8. Review of Risk assessment

**Step 9:** Reported by - a person who initiated the report. (HSE officer/Manager)

Reviewed by - Project Manager and HSE Manager

**Step 10:** Distribution – Copies of the report shall be distributed to Project Director, Project/Facility Manager, Supervisor, HSE Officer.

Concerned incident investigation and reporting forms shall be submit to the concerned authorities such as the Sector Regulatory Authority (SRA).

Once the actions described above have been completed, the Investigation team shall initiate an investigation according to the level of severity rate.

<table>
<thead>
<tr>
<th>SEVERITY RATE</th>
<th>INVESTIGATION TEAM</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>POTENTIAL – LESS THAN 1 ACTUAL – LESS THAN 1 DIRECT SUPERVISOR, HSE OFFICER</td>
</tr>
<tr>
<td>2</td>
<td>POTENTIAL – MORE THAN 1 ACTUAL – MORE THAN 2 HSE OFFICER; PROJECT/FACILITY MANAGER; ANY RELEVANT SPECIALIST</td>
</tr>
<tr>
<td>3</td>
<td>POTENTIAL – MORE THAN 2 ACTUAL – MORE THAN 2 MANAGING DIRECTOR; PROJECT DIRECTOR; PROJECT MANAGER; HSE OFFICER; SAFETY REPRESENTATIVE</td>
</tr>
</tbody>
</table>

Incidents are to be investigated to determine underlying causes, using an appropriate method. As a minimum, the following are to be investigated and reviewed by Investigation Team.

*Analyzing data*

Incident Review follows Investigation and is principally concerned with preventing the recurrence of incidents via discussions on underlying causes and remedial actions. Incidents should be reviewed to a level of detail commensurate with Risk Potential.

The HSE Manager’s prime responsibilities are:

- To challenge and test investigation team to ensure all active and latent failures are identified.
• To review and endorse the actual severity and potential risk rating provisionally assigned to each incident.

• To endorse recommended corrective and remedial action items

• To confirm actions, action parties and deadline for close out.

• Note: assigned action parties outside the Project Director’s/Deputy General Manager’s direct control shall formally agree to accept the action item.

• To determine appropriate lateral learning method to ensure that all key personnel are adequately informed to prevent a reoccurrence.

• Minutes of the Incident Review meetings shall be recorded.

**Action plan**

Corrective actions must be designed to address management system needs and deficiencies, in addition to preventing recurrence of all root and direct causes.

Action plan must be Specific, Measurable, Achievable, Realistic, Time bound (S.M.A.R.T.)

*(GTGC-RID-HSEMS-MAN-02)*
Appendix A:

Local & International Standards

Customer Requirements

- Tender & Estimation
- Planning
- Procurement & Asset
- Plant & Equipment
- Operations

Objectives

Standard Procedures

Customer Satisfaction

Continual Improvement

Vision, Mission, Core Values & Policies
QHSE Management System, Finance
Management, Workshop Management, Human
Resource Management, Administration
Management, Information Technology
Management, Communication
Appendix B:

QUALITY POLICY STATEMENT

We, Ghantoot Transport & General Contracting LLC - Roads & Infrastructure Division, take pride and honour in declaring the company’s commitment to provide our professional contracting services throughout the region of the United Arab Emirates & abroad in line with our quality objectives and targets at all stages of our operations. We are committed to working towards our customers’ satisfaction and the continual improvement of the delivery of all our products and services. These are essential components of our business strategy and our compliance with the requirements of ISO 9001:2015.

We believe in the cooperation and participation from each member of our team; management and employees alike, in order to achieve excellence in all aspects of our endeavours. In order to achieve our objectives and maintain the principles of this policy, Ghantoot Group - Roads & Infrastructure Division management and employees shall be committed to:

- Accept quality as being every individual’s responsibility
- Strive to meet customer requirements and to enhance customer satisfaction
- Measure and evaluate our performance through management review meetings
- Contribute to the use of technological innovation within our industry sectors
- Encourage proactive involvement through support, training, education and dialogue
- Respect our co-workers, colleagues, customers and the public
- Communicate this policy and ensure its awareness throughout the organisation
- Provide leadership and commitment that is required to maintain an effective quality management system and its continual improvement
- Assign responsibility and accountability to staff members and management where appropriate and specific to the related business process
- Providing the necessary resources for an effective implementation of the quality management system
- Communicating the Importance of the Quality Management System at all levels and creating a Quality culture in the organisation
- Develop sound information and planning systems to solve potential risks before the problem occurs
- Enhance the skills of our people through training, personnel motivation, fostering a professional work ethic atmosphere
- Comply with the requirements for ISO 9001:2015 and continually improve its effectiveness
- Establish, implement and continually measure the achievement of our approved Quality objectives and targets as well as our stated policy
- Committed to strictly comply with the legal requirements

This Quality Policy Statement will be reviewed annually and enhanced as required to ensure continued suitability to the services we provide. This policy statement will be made available to external interested parties upon request as well as to the public.

All Mohammed Aldheebi, Chairman, Ghantoot Transport & General Contracting LLC

GTGC-RID-IMS-PLC-03 07-05-2018
OCCUPATIONAL HEALTH & SAFETY
POLICY STATEMENT

We, Ghantoot Transport & General Contracting LLC- Roads & Infrastructure Division, take pride and honour in declaring the company’s commitment to provide our professional contracting services throughout the region of the United Arab Emirates & abroad in line with our occupational health and safety objectives and targets at all stages of our operations. We are committed to working towards our customers’ satisfaction and the continual improvement of the delivery of all our products and services. These are essential components of our business strategy and our compliance with the requirements of ISO 45001:2018 as well as the latest version of OSHAD SF.

We believe in the cooperation and participation from each member of our team; management and employees alike, in order to achieve excellence in all aspects of our endeavours. In order to achieve our objectives and maintain the principles of this policy, Ghantoot Group- Roads & Infrastructure Division management and employees shall be committed to:

- Accept care for occupational health and safety as being every individual’s responsibility
- Providing and maintaining safe and healthy working conditions for the prevention of work related injury and ill health that is reflected in the context of organisation and its risk and opportunities
- Eliminate hazards and reduce occupational health and safety risks
- Consultation and participation of interested parties and workers
- Determine and comply, as a minimum, with applicable legal and other requirements in addition to the local municipal regulations such as the Abu Dhabi OHSAD system framework
- Measure and evaluate our occupational health and safety performance through management review
- Contribute to the use of technological innovation within our industry sectors
- Communicate this policy and ensure its awareness throughout the organisation
- Provide leadership, commitment and necessary resources required to maintain an effective Occupational Health and Safety Management System and its continual improvement
- Enhance the skills of our people through training, personnel motivation, fostering a professional work ethic atmosphere
- Establish, implement and continually measure the achievement of our occupational health and safety objectives and targets as well as our stated policy
- Committed to strictly comply with the legal requirements.

This Occupational Health and Safety Policy Statement will be reviewed annually and enhanced as required to ensure continues suitability to the organisation provide. This policy statement will be made available to external interested parties upon request, along with the public.

Ali Mohammed Sadeq Al Boomish
Chairman—Ghantoot Transport & General Contracting LLC

GTGC-RID-IMS-PLC-02
07-05-2018
ENVIRONMENT POLICY STATEMENT

We, Ghantoot Transport & General Contracting LLC - Roads & Infrastructure Division, take pride and honour in declaring the company’s commitment to provide our professional contracting services throughout the region of the United Arab Emirates & abroad in line with our environment objectives and targets at all stages of our operations. We are committed to working towards our customers’ satisfaction and the continual improvement of the delivery of all our products and services. These are essential components of our business strategy and our compliance with the requirements of ISO 14001:2015 as well as Environmental Agency of Abu Dhabi requirements.

We believe in the cooperation and participation from each member of our team; management and employees alike, in order to achieve excellence in all aspects of our endeavours. In order to achieve our objectives and maintain the principles of this policy, Ghantoot Group - Roads & Infrastructure Division management and employees shall be committed to:

- Accept care for the environment as being every individual’s responsibility
- Maintaining healthy and productive work environment
- Prevention of pollution at all sites of our operations
- Determine and comply, as a minimum, with applicable legal and other requirements and obligations related to our environmental aspects in addition to the local municipal regulations
- Protect the environment from harm and degradation arising from our activities during operation
- Encourage and enhance product recycling and address conditions related to waste, water and air quality
- Measure and evaluate our environment performance through management review meetings
- Contribute to the use of technological innovation within our industry sectors
- Encourage proactive involvement through support, training, education and dialogue
- Communicate this policy and ensure its awareness throughout the organisation
- Provide leadership, commitment and necessary resources required to maintain an effective Environment Management System and its continual improvement to enhance our environmental performance
- Determine the context of the organisation and planning systems to solve potential risks before the problem occurs
- Enhance the skills of our people through training, personnel motivation, fostering a professional work ethic atmosphere
- Establish, implement and continually measure the achievement of our environment objectives and targets as well as our stated policy
- Committed to strictly comply with the legal requirements.

This Environment Policy Statement will be reviewed annually and enhanced as required to ensure continues suitability to the services we provide. This policy statement will be made available to external interested parties upon request as well as on request.

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Ali Mohammed Saad Al Bidouni
Chairman –Ghantoot Transport & General Contracting LLC

GTGC-RID-IMS-PLC-01
07-05-2018
Appendix c