

NARO Water Solutions FZC

HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM

HSE Manual

(Health, Safety and Environment)



Approval Details

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Organization Address

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NARO Water Solutions FZC

HSE Management System Manual

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1.0 Introduction

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In the field of HSE, the Company aims for the continuous improvement of its Health, Safety and Environment Management System through the full and systematic implementation of the ISO 14001:2015 and ISO 45001:2018 requirements while giving due emphasis to the training needs of its personnel.

This manual provides guidance to our company's personnel to carry out the tasks in conformity with their responsibility and authority in their respective areas. HSE Manager is responsible for adequacy of the contents, distribution and general administration of this manual. This HSE Manual is the property of NARO Water Solutions FZC.

The HSE Manual is the second level of documents of the NWS Health, Safety and Environment Management System tailor-made to particular operation that describe all the key operations or processes to be carried out during the job execution. The HSE Manual is prepared by our HSE department, reviewed and approved by management to ensure that all the works carried by the company employees as well as our sub-contractors are executed as per the specifications, drawings, statutory requirements and other contractual agreed requirements. HSE Manual is prepared for all projects and implemented as per company's Health, Safety and Environment Management System (HSE) and contract specific requirements.

The aim of this HSE Manual is to facilitate easier implementation of HSE requirements in our works, by presenting it in a documented form. This HSE Manual is also ensures operation, technical, procurement, HSE and planning to meet the specific requirements of contracts, specifications, drawings and statutory.

The HSE Manual also defines the site management functional responsibilities and the organization, the HSE system procedures and the records to be generated, the relevant inspections and tests to be conducted for the several activities with respect to Health, Safety and Environment monitoring, the applicable corporate procedures and additional procedures/ method statements that need to be followed during execution of all the projects, as well as integrated management programs to achieve identified objectives and targets.

All sub-contractors engaged in carrying out work under the authority of NWS must abide with the procedure herein as a minimum requirement and copies of this Manual are furnished to all subcontractors as required. Prior to commencement of work, all NWS staff and its subcontractors working in projects shall review and understand the contents of this HSE Manual.

Every employee on the sites are required to adhere to the procedures and best practices as defined by this HSE Manual to achieve the project objective of "completing the project in time with specific emphasis on Safety and Environment aspects of the project".

1.1 About the Organization

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NARO WATER SOLUTIONS has become one of the leading innovation solutions and service provider in Water and Wastewater Treatment field. Starting with small domestic requirements, NARO WATER SOLUTIONS has got extended its services to cover the industrial sectors including Oil & Gas, Power, Petrochemical, Pharmaceutical, Food, Beverages and Mining.

Our solutions are being custom designed, engineered and manufactured, as result of individual study of each client and project requirements, in order to harmonize within their needs and existing facilities.

Our aim is to provide reliable, high quality, low capital and running cost solutions.

Our Mission

We provide the highest quality products and services to our customers, while striving to solve their requirements related to water or wastewater treatment and build long term, repetitive cooperation.

Eco Standards

NARO is aimed to provide eco-friendly processes that help in reducing water wastage by recycling water that would otherwise be deemed to be unsanitary and end up being disposed. The process is being designed to comply the application needs, environmental regulations and discharge standards.

1.1.1 Our Services:

NARO WATER SOLUTIONS is committed to serve the customers according to their needs, with our custom designed and made solutions.

We serve the clients requirements starting from study stage. Our specialists will visit you to help evaluate your needs, study the characterization of Water / Wastewater and identify a solution to best meet your needs.

Range of services offered by NARO WATER SOLUTIONS:

- Process Design
- Detailed Engineering
- Procurement
- Fabrication
- Supervision of installation & Commissioning
- Operations & maintenance
- Training of client staff
- Consultancy
- Supply of spare parts and consumables



1.1.2 Organizational Scope of Work

NARO Water Solutions FZC is mainly involved in the Water Treatment Equipment & manufacturing

1.2 Organization Location

Organization Name	NARO Water Solutions FZC
Organization Address	SAIF Zone, Q4-265, Sharjah-UAE
Telephone	+971 6 5573257
Email	info@NAROwater.com
Website	www.NAROwater.com

1.4.1 Google Map





2.0 Reference Documents

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The following reference documents have been used in the preparation of NARO Water Solutions FZC HSE Manual.

- ISO 14001:2015, International Standard for Environmental Management Systems
- ISO 45001:2018, International Standard for Occupational Health and Safety Management Systems
- ISO 19011:2018, Guidelines for Internal Auditing of QMS.
- ISO 31000:2018, Guidelines for risk management
- Ministry of Labour & Social Affairs Ministerial Order No. 32: 1982
- Federal Environment Law No. 24: 1999
- Pas 99 Specification of Common Management System Requirements as a framework for integration
- Project Contract, Specification & Drawings,
- Municipality Regulations
- NWS Health, Safety and Environment Management System
- Decree No. 42 of 2009 Concerning the Environment, Health and Safety Management Systems.

S.N	Terms	Definition & Abbreviations	
1.	NWS	NARO Water Solutions FZC	
2.	Appropriate	Reasonable	
3.	Documented	Written	
4.	Product	End result of a process	
5.	Process Owner	Department head / responsible individuals who carry out entire activities related to a process / procedure.	
6.	Suitable	Reasonable for intended purpose	
7.	MRM	Management Review Meeting	
8.	ISO	International Organization for Standardization	
9.	ISO 14001	Environmental Management Systems	
10.	ISO 45001	Health & Safety Management Systems	
11.	HSE Manager	Health, Safety & Environmental Manager	
12.	CEO	Chief Executive Officer	

3.0 Abbreviations and Definitions



13.	СА	Certifying Agency	
14.	NC	Non Conformance	
15.	HSEM	Health Safety Environmental Management System Manual	
16.	Context of the organization	An organization's context is its business environment. It includes all of the internal and external factors and conditions that affect its products and services, have an influence on its HSE, and are relevant to its purpose and strategic direction.	
17.	Effectiveness	Effectiveness refers to the degree to which a planned effect is achieved. Planned activities are effective if these activities are actually carried out and planned results are effective if these results are actually achieved.	
18.	HSE Team	A team of management staff & key department personnel for managing and monitoring the best HSE Practices in NWS.	
19.	Prevention of Pollution	Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control the source of creation , emission or discharge of any type of pollutant waste, in order to reduce adverse HSE impact	
20.	Environment	Surrounding in which NWS operates including Air, Water, Land, Flora Fauna , natural resources, human resources and their interrelation.	
21.	Environmental Aspect	Element of NWS's activities or services that can interact with environment.	
22.	Environmental Impact	Any change to the environment, whether adverse or beneficially, partially or wholly resulting from NWS's environmental aspects.	
23.	Organization	Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives	
24.	Interested party and Stakeholder	Person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity	
25.	Worker	Person performing work or work-related activities that are under the control of the organization	
26.	Participation	Involvement in decision-making	
27.	Consultation	Seeking views before making a decision	
28.	Workplace	Place under the control of the organization where a person needs to be or to go for work purposes	
29.	Contractor	External organization providing services to the organization in accordance with agreed specifications, terms and conditions	
30.	Requirement	Need or expectation that is stated, generally implied or obligatory	
31.	Legal requirements and other requirements	Legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with standard.	



32.	Management system	Set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives
33.	HSE management system	Management system or part of a management system used to achieve the HSE policy.
34.	Top Management	Person or group of people who directs and controls an organization at the highest level
35.	Effectiveness	Extent to which planned activities are realized and planned results achieved
36.	Policy	Intentions and direction of an organization, as formally expressed by its top management
37.	Occupational health and safety policy	Policy to prevent work-related injury and ill health to workers and to provide safe and healthy workplaces
38.	Objective	Result to be achieved
39.	Occupational health and safety objective	Objective set by the organization to achieve specific results consistent with the HSE policy
40.	Injury and ill health	Adverse effect on the physical, mental or cognitive condition of a person
41.	Hazard	Source with a potential to cause injury and ill health
42.	Risk	Effect of uncertainty
43.	Occupational health and safety risk	Combination of the likelihood of occurrence of a work-related hazardous event(s) or exposure(s) and the severity of injury and ill health that can be caused by the event(s) or exposure(s)
44.	Occupational health and safety opportunity	Circumstance or set of circumstances that can lead to improvement of HSE performance
45.	Competence	Ability to apply knowledge and skills to achieve intended results
46.	Documented information	Information required to be controlled and maintained by an organization and the medium on which it is contained
47.	Process	Set of interrelated or interacting activities which transforms inputs into outputs
48.	Procedure	Specified way to carry out an activity or a process
49.	Performance	Measurable result
50.	Occupational health and safety performance	Performance related to the effectiveness of the prevention of injury and ill health to workers and the provision of safe and healthy workplaces



51.	Outsource	Verb make an arrangement where an external organization performs part of an organization's function or process
52.	Monitoring	determining the status of a system, a process or an activity
53.	Measurement	Process to determine a value
54.	Audit	A systematic and documented verification process of objectively obtaining and evaluating the evidence to determine that the integrated systems conform to the requirements of ISO 14001 and ISO 45001:2018.
55.	Conformity	Fulfilment of a requirement
56.	Nonconformity	Non-fulfilment of a requirement
57.	Incident	Occurrence arising out of, or in the course of, work that could or does result in injury and ill health
58.	Corrective action	Action to eliminate the cause(s) of a nonconformity or an incident and to prevent recurrence
59.	Continual improvement	Process of enhancing the integrated system to achieve improvements in the overall performance
60.	Health, Safety and Environment Management	A Management System that incorporates all the clauses and requirements of ISO 14001 and ISO 45001:2018
	System (HSE)	

4.0 Context of the organization

4.1 Understanding context of the organization

NWS determined the internal and external issues which have ability to effect on achieving its intended results of its HSE. NWSconducted a detailed analysis by considering the external and internal issues and maintained. NWS is planned to periodically review this data during the management review meeting.

NWS services considered the positive and negative issues, which from external or internal origin while understanding the context. The main sources of issues from external origin are already identified by NWS and are from legal, technological, competitive, market, cultural, social and economic environments, whether international, national, regional or local. The internal issues which identified are related to values, culture, knowledge, structure and performance of the organization.

Reference: SWOT Analysis

NWS-IMSP-04-F-02

4.2 Understanding the needs and expectations of interested Parties

NWS has determined the interested parties and their needs and expectations according to the Procedure for Determining the Context and Interested Parties and listed them in the List of Interested Parties.

Reference: List of Interested Parties NWS-IMSP-04-F-01

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4.3 Determining the scope of the Health, Safety and Environment Management System

NWS established and implemented the HSE, which is maintained and continually improved according to the requirements of the international standard including processes needed and their interactions. NWS determined the processes needed for the HSE and their application through the organization.

NWS determined required inputs and desired outputs of the processes, criteria and methods needed for effective operation and control of these processes, as well as resources needed and responsibilities and authorities for processes in the HSE and Plan.

The HSE system defined applies to all types Services executed by the company. This section describes the structure of the documented Health, Safety and Environment Management System established and implemented by the organization. The documented HSE system covers all departments in the organization except financial matters / Accounts.

NWS has developed a Health, Safety and Environment Management System, for better fulfilment of the needs of its clients and to improve the management to achieve efficiencies and better Health, Safety and Environment outcomes. This document applies to IT Infrastructure, Information Technology Consultants and Software House.

The scope of the Health, Safety and Environment system for NWS includes:

- To provide necessary guidelines with respect to various permit to work guidelines at site operations.
- To provide effective and systematic Incident investigation and reporting mechanisms, to ensure that further risks of workplace incidents are eliminated.
- To mitigate, prepare for, respond to and recover from operational emergencies as May occur in or near the IT Infrastructure, Information Technology Consultants and Software House during execution of work.
- Comply with all legal and other requirements applicable to NWS activities in relation with Health, Safety and Environment matters.
- To provide and specify the methodology of HSE risk & impacts assessment; and the development of controls as appropriate for NWS.



• To provide instructions and to assign responsibilities for controlling that IT Infrastructure, Information Technology Consultants and Software House and activities those are associated with HSE Risk and Impact.

The brief scopes of the organization is Water Treatment Equipment & Manufacturing.

4.4 HSE and its Processes

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Following activities have been carried out to define and effectively implement the system needed to accomplish HSE requirements:

- The processes needed for HSE and their application throughout the organization is identified by Process flow chart and interaction of HSE.
- Sequence of IT Infrastructure, Information Technology Consultants and Software House is identified by procedures
- Criteria of operation and measurement of these processes are defined to ensure effective control.
- The documented system is established through this HSE System Manual, departmental procedures and work instructions. These documents ensure that Services conform to NWS and the customers' requirements.

All HSE processes are monitored and analysed to achieve results as per the NWS's strategic business plan. The continual improvement of these processes is measured and monitored by periodic Analysis of Data, audits & Management Review. All these activities are planned and implemented in the framework of HSE.

Reference: Procedure for Context of the Organization, NWS-IMSP-04



4.4.1 Interaction of Processes



5.0 Leadership & Governance

5.1 Leadership & commitment

5.1.1 General

The top management of NWS is taking accountability for the effectiveness of the HSE and providing resources to ensure that the HSE Policy and HSE Objectives will be compatible with the strategic direction and the context of the organization.

The top management ensures that HSE requirements are integrated into NWS IT Infrastructure, Information Technology Consultants and Software House and that the HSE is achieving the intended results. The top management communicates the importance of an effective HSE, promotes continual improvement, a process approach, and risk-based thinking, and supports relevant management roles to demonstrate leadership to their areas of responsibility.

The management is committed to deliver the promised services to its valued customers. To achieve this objective, adequate competent resource is ensured, processes are identified and responsibilities are delegated to various personnel who add value to processes. The Health, Safety and Environment Management System established is aimed to add HSE to all activities which are part of converting customer requirements into the facilities services.

Reference: Organization Chart and HSE Policy NWS-HSE-P-02

5.2 HSE Policy

Top management ensures that the HSE Policy are established appropriately to the purpose of the organization, has a commitment to comply with legal and other requirements and continually improves the effectiveness of the HSE and prevention of pollution, injury and ill health, includes a commitment to comply with applicable legal requirements and with other requirements to which the organization subscribes, provides a framework for establishing and reviewing objectives and targets, is documented, implemented and maintained.

Top management will be responsible also for communicating the HSE Policy within the organization and to all persons working for or on behalf of the organization with the intent that they made aware of their individual obligations, is available to interested parties and periodically review it for continuing suitability.

5.2.1 Establishing the HSE Policy

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HSE Policy is declared by the NWS's top management with an objective to achieve customer satisfaction. These policies are communicated to all level of employees in the organization to ensure their commitment to HSE. The effectiveness of HSE is evaluated periodically and analyzed whether the HSE Policy objectives have been achieved. The new goals are set necessary improvements are made in the system to ensure effective operation. HSE Policy is controlled in the same way as other documents and it is ensured that all individuals in the organization understand objectives of the policies.

5.2.2 Communicating the HSE Policy

The process sequence, linkage / interrelation, interactions, method of operation & control and process criteria of monitoring & measurement are carried out as stated above in clause 4 and are communicated to all employees through this documentation.

Where the performance of one process affects the other process, concerned Manager & MR will initiate appropriate actions. Effective internal communication system is established by combination/ all of the following:

- Notice board
- Verbal communication to Staff
- Internal Memos
- E mail
- Display of HSE Policy and objectives
- Management Reviews / minutes of meetings
- Internal training activities

Reference: HSE Policy, NWS-HSE-P-02

5.3 Organizational roles, responsibilities and authorities

5.3.1 Responsibility and Authority

General: For the "IT Infrastructure, Information Technology Consultants and Software House Phase Health, Safety and Environment Management Plan" to be effective, it is essential that the management and supervisory staff is familiar with and implement the relevant requirements of the plan. All management and supervisory personnel shall therefore be provided with a controlled copy of the said plan. The Project shall actively seek the support of all the operatives engaged on the project to look after the safety and health of themselves and their colleagues by working within the spirit of this "IT Infrastructure, Information Technology Consultants and Software House Phase Health, Safety and Environment Management Plan". Any person found to be in violation the requirements should be subject to disciplinary action, which may result in their dismissal from the project.



Authorization: Only persons formally inducted by the HSE Department and are qualified to carry out the works for NWS and have been instructed to do so in writing, are authorized to participate in site activities. Those authorized persons must be in possession of a valid UAE Labor Permit and proof of the site-specific induction by means of a unique induction sticker issued.

Roles and Responsibilities: Each position identified in the Project Management Team has defined responsibilities for the management of safety and integrity issues. Safety within the project is a particular responsibility of line managers (Operation Managers, Site Engineers, site superintendents, area coordinators and supervisors). HSE Co- coordinators are delegated supporting roles to assist managers and supervisors fulfil their accountabilities. All management team members shall acknowledge acceptance of their HSE responsibilities in writing. The Operation Manager shall be responsible for coordinating the HSE responsibilities on the project. The responsibilities for the key management and supervision roles include (but are not limited to) the following:

CEO

- To oversee all the operations of the organization and manage individual process of the company to run it into a profitable organization
- To formulate policies, setting up goals and targets and guiding other members of the management to achieve them successfully
- Responsible for budgeting and operating the company funds to maximize proper obligations of them to earn maximum profitability
- Decision maker in upgrading the resources of the organization to fulfil the business
- Establishing business plans and strategy
- Establishing company Health policy / objectives and commitment
- Ensuring that HSE are developed, implemented, maintained and continuously improved
- Establishing personnel recruitment & benefits policy
- Ensuring financial commitments are fulfilled
- To develop cost estimates.

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- To ensure proper accounts books are maintained and audited.
- Ensuring all statutory laws, rules and regulations are complied with respect to labour, immigration, local authorities and HSE
- Authorized to stop the processes when found to be deviating from the requirements
- Community and Public Relations, Assures the organization and its mission, programs, and services are consistently presented in strong, positive image to clients.

Accountabilities

- To ensure that overall corporate HSE matters of the organization.
- To keep looking for business opportunities within the region and exploit those with appropriate planning.



• To ensure all the operations of the company run within the legal framework and boundaries applied in the region.

Senior/ Top Manager:

- Formulate and implement a Health, Safety and Environment Management System.
- Provide a safe work place, Environment, Facilities and Equipment.
- Review safety matters on regular basis with the department Managers.
- Provide budgetary support for all the necessary safety programs initiated.
- Make sure safe behavior of the employees is a condition of employment.
- Review accident reports and respond where necessary.
- Be visibly committed to making health and safety work. Inspire others to make it work.
- Ensure that adequate and suitable planning is done to provide safe and healthy workplaces.
- Hold employees and subcontractors accountable for the authority and responsibility delegated to them.

Accountability

- To ensure that the company remains profitable and give good returns to headquarter.
- To keep looking for business opportunities within the region and exploit those with appropriate planning.
- To ensure all the operations of the company run within the legal framework and boundaries applied in the region.

Human Resources

Include HSE roles and responsibilities in job descriptions, induction training and performance management programs at the time joining HR Manager is given the documented roles and responsibilities to new employees:

- Facilitate and organize HSE training;
- Provide information and statistics to assist in the calculation and analysis of key performance indicators;
- Participate in the development of HSE strategy and implementation plans; and
- Participate in the development and awareness of HSE Policy and procedures.
- Organize periodic renewal of Licenses
- Submission of correct documentation to the Ministry of Labour for visa applications
- Submission of correct documentation to obtain licenses and efficient collection of Licenses to take place when completed
- Represent the Company at locations such as the Police Station, Airport, Hotels, Embassies, Ministries/Municipalities & other significant Departments & in accordance



with services such as mobile & landline phone services (connections/ disconnections/ repairs), mail and electricity.

- Take, submit & collect all necessary documentation in order to organize all Employee official paperwork.
- Arrange medical tests, passports, memos, promotional draws and fine resolution.
- Accompany the employee as they exit the country.

Accountabilities

- Performance and adequacy of the document control system.
- Quality hiring of potential resources for the company
- Development of HR policies and procedures

Purchase and Storekeeper

- Sending enquiries to vendors and compile the quotations from the vendors,
- Preparing purchase order,
- Liaising with the Vendors for delivery schedule and terms and conditions,
- Inspecting the received materials and informs the QA / QC Engineer for further inspection,
- Receiving Customer supplied product,
- Product identification and traceability and its proper and safe storage, logistics,
- Issue of material from the stock as per the store requisition form and as per the material stock released form approved by Operation Manager,
- Preparation of Store receipt voucher (SRV), miscellaneous goods voucher (MGRV). Store issue record (SIV),
- Ensure records are produced, filed, and stored as per operating procedure.

Accountabilities

- To supervise and coordinate purchases for the company.
- To arrange quotations, make comparison, place purchase order and coordinate with the suppliers.
- To ensure that all purchased materials are checked quality and quantity wise and entered properly in the stock register.
- To ensure all the store activities as per company's policy and procedure.
- To ensure stock count in the stock register is matching with actual stock at all times.

Accountant

- Compiles and analyzes financial information to prepare entries to book of accounts.
- Analyze daily banking transactions
- Payroll reconciliation



- Verify contracts, orders, and vouchers
- Monitor compliance with generally accepted accounting principles and company procedures.
- Reviews, investigates, and corrects errors and inconsistencies in financial entries, documents, and reports.
- Keep account books and accounting systems up to date.
- Issue checks for accounts payable.
- Match invoices to work orders.
- Prepares asset, liability, and capital account entries by compiling and analyzing account information.
- Summarizes current financial status by collecting information; preparing balance sheet, profit and loss statement, and other reports.
- Maintains accounting controls by preparing and recommending policies and procedures.
- Secures financial information by completing data base backups.
- Prepares payments by verifying documentation.
- Maintains company financial information confidential.

Accountabilities

- To consider the requirements related to HSE matters (Legal / Contractual) during finance activities, to effectively implement.
- Performance and adequacy of the document control system related to his/her job.
- To ensure that the company remains profitable and give good returns to head office.

Public Relations Officer:

- Send out notifications on documentation required to renew trade licenses and complete surveys, etc. required by the government bodies at the time of license renewals.
- Submit detailed reports related to visa expenses to the finance department.
- To submit required documentation to the banks and process bank transactions as advised by the Operation Manager.
- Represent the Company at locations such as the Police Station, Embassies, Ministries/Municipalities & other significant Departments in accordance with services such as mobile & landline phone services (connections/disconnections/repairs), mail, electricity.
- Purchases supplies and maintains inventory.
- Handle expense claims following Operation Managers approval.
- Maintain confidentiality and security of company and employee documents at all times.

Accountabilities

• To update legal requirements related to HSE matters for the organizations compliance periodically.



- Performance and adequacy of the document control system.
- Quality hiring of potential resources for the company
- To ensure that the company remains profitable and give good returns to head office.

Secretary:

- Maintains key corporate documents and records.
- Produces correspondence and documents and maintain presentations, records, spread sheets and databases.
- Sorting and distributing incoming posts and organizing and sending outgoing posts.
- Keeps up-to-date contact details (i.e. names, addresses and telephone numbers) for the management committee and (where relevant) ordinary members of the organization.
- Compiles lists of names and addresses that are useful to the organization, including those of appropriate officials or officers of voluntary organization.
- Photocopying and printing various documents, sometimes on behalf of the staff.
- Circulating agendas and reports.
- Orders and maintains stationery and equipment.

Accountabilities

- To consider the requirements related to HSE matters (Legal / Contractual) during finance activities, to effectively implement.
- Performance and adequacy of the document control system related to his/her job.
- To ensure that the company remains profitable and give good returns to head office.

Operation Manager

The Operation Manager has a duty to ensure:

- Promote a culture in which safety is the prime concern that shall never be compromised.
- Ensure that adequate health, safety and environmental hazard evaluations are made on project, plant and equipment purchases.
- Implement project specific plans that comply with the HSE Policy and Procedures.
- Provide resources to eliminate hazards and improve safety.
- Incorporate health, safety and environmental targets assisted by direct reports.
- Ensure that safe systems of work are defined and documented, and that hazards analysis and risk control methods have been incorporated during the preparation.
- Ensure that any Safety Committee is established and functions effectively.
- Ensure thorough investigation of all incidents to avoid recurrence.
- Review HSE audits and ensure review meetings are held.
- Promote the involvement of all employees in improving safety.
- Focus on the elimination of unsafe acts and rectify unsafe conditions.



- Ensure safety responsibility is an integral part of all management systems and processes.
- Provide resources and ensure that actions to address safety issues are implemented.

Accountability

- To ensure that the company remains profitable and give good returns to headquarter.
- To keep looking for business opportunities within the region and exploit those with appropriate planning.
- To ensure all the operations of the company run within the legal framework and boundaries applied in the region.
- Keep up-to-date with project legislation and communicate changes to affected areas.
- Ensure that the project documentation is reviewed and updated following any Changes to project legislation.
- Ensure that the project responsibilities of contractors are documented in consultation with top management.
- Ensure the HSE is regularly audited and reports are produced and distributed.
- Produce timely reports on project performance for the Company

HSE Manager:

- Responsible for the Company's HSE implementation.
- Liaise with Department Managers in implementation of Health, Safety and Environment Management System and issues safety directives accordingly.
- Monitors, reviews and advises the CEO on HSE Policy implementation and results of the HSE audits.
- Makes sure HSE roles, responsibilities, policies, plans and objectives are communicated to all relevant personnel.
- Monitors HSE training requirements of personnel and coordinates in arranging internal and external training.
- Receives client's latest HSE standards and procedures and advises the CEO to revise Company procedures accordingly, if necessary.
- Preventing injury to personnel and damage to plant and equipment.
- Determine the cause of any accident or dangerous occurrence and recommend means of preventing recurrence.
- Promote awareness of injury prevention and damage control to all levels of employees.
- Supervise the recording and analysis of information on injuries, damage and loss, assess accident trends and review overall safety performances.
- Keep up-to-date with recommended codes of practices and new safety literature; circulate information applicable to each level of employees.

Accountabilities



- Keep up-to-date with HSE legislation and communicate changes to affected areas.
- Ensure that the HSE and documentation is reviewed and updated following any Changes to HSE legislation.
- Ensure the risk management procedure is documented within the HSE.
- Safe handling of hazardous substances and dangerous goods
- Safe handling of materials
- Investigation of incidents.
- Management of HSE documents and records.
- HSE Auditing
- Manage and Review the HSE training program
- Ensure that the HSE responsibilities of contractors are documented in consultation with project management team.
- Ensure the HSE is regularly audited and reports are produced and distributed.
- Produce timely reports on HSE performance for the Company

HSE Officer:

- Ensure that all site personnel and visitors adhere to the safety rules.
- Implement safety rules where necessary.
- Carry out work site surveyors on daily and weekly basis and report to Operation Manager.
- Inspect tools and equipment arriving on site prior to issue, removing defective tools and replacing them with working items.
- Record the analyze accidents, injuries, damages and report to the safety manager.
- Inspect and report to the manager that the site and office areas are maintained in suitable condition for work, Health & Safety.
- Ensure that the safety and fire precautions are constantly enforced.
- Authorize to stop activities which are not adhering to the Organization's Health and Safety Requirements.
- Ensure that safety requirements are regularly investigated and made available.
- Keep up to date with recommended safety literature and display safety placards.
- Ensure that up dated safety manual is being issued to key personnel and acknowledgement is noted.
- Conducts on the job training on Health and Safety Procedures and requirements.
- Ensure that healthy work conditions are maintained.
- Advise the safety manager of any enforcement of new safety regulation as per UAE regulations.
- Prepare safety reports for the safety manager to endorse and issue.
- Ensure Material Safety Data Sheet is supplied for all solvents used on site.
- All site personnel will be indoctrinated into the safety plan. Evidence of this training will be maintained. Conduct weekly toolbox meeting.
- Completes Monthly Safety Report which is submitted as part of Project's Monthly Report.



• The site safety personnel will be directly responsible to the safety manager.

Accountabilities

- To ensure the health, safety and environmental aspects of the work area as well as HSE requirements.
- To report the safety statistics and Incident / accident reports of the work area to the management.
- To ensure all instructions, toolbox discussions, trainings, awareness, emergency preparedness are fully communicated and properly recorded and confirmed in written by all employees.

Supervision (Engineers/ Supervisors / Foremen)

The main duties of the appointed Site Engineers are as follows:

- Promote a culture in which safety is the prime concern and shall never be compromised.
- Ensure self and others safety awareness at all times and promote the involvement of all employees in improving safety.
- Ensuring that safety instructions and procedures are implemented and practices to eliminate hazards.
- Focus on the elimination of unsafe acts and rectify unsafe condition.
- Facilitate with job specific risk assessments and sign of and approval thereof before submitting to the site HSE Coordinator.
- Ensure Contractors in your discipline and area comply with these rules and rectify any deviations immediately.
- Being familiar with any emergency procedures and ensure instructions are followed when necessary.
- Reporting any defects on plant and equipment to the Operation Manager.
- Ensuring the required job specific risk assessment is completed on a daily basis.
- Participation in accident /incident investigations.
- Ensuring accident reporting procedures are adhered to.

Employees:

- All employees have a responsibility for their own safety and for other colleagues, who may be affected by their activities.
- Understand the company safety policy and appreciate their individual safety responsibility for themselves, for their co-workers and company.
- Use the correct tools for the right job. Use properly personal protective equipment provided by the company.
- Keep tools and equipment in good condition, inspect tools and equipment for defect before use and report defects immediately to the supervisor.



- Refrain from horseplay, abuse or misuse of safety devices, equipment and welfare facilities. Vandalism will lead to dismissal.
- Be constantly alert to unsafe conditions and report them to the supervisors for corrective action.
- Report any accident or injury no matter how small.
- Obey all posted warning signs and safety instructions.
- Follow instruction from supervisors. If in doubt, ask questions. Never commence work without ensuring that work can be done safely. strictly observe "permit to work system"
- Know emergency procedures (Siren Codes, Assembly point etc).
- Report hazardous or unsafe conditions to their superintendent.
- Perform the job without endangering him or co-workmen.
- Persons found under influence of alcohol or drugs will be immediately dismissed

Accountabilities

Employees are accountable to their supervisor through:

- Regular one-to-one meetings
- The Performance Development Scheme
- Job descriptions

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All workers have the authority to:

- Commence an emergency response
- Raise health and safety issue
- Cease work where there is an immediate and serious threat to the health and safety.

First Aider:

- Provides first aid in case of any injury and safely transports the person for further medical consultation if required,
- Immediately informs all reportable accident to the HSE Manager,
- Keeps proper follow up for all injuries and illnesses,
- Maintains the first aid facilities on site and attends to all injured Personnel at the worksite,
- Checks the first aid box to ensure that the contents are replenished regularly,
- Maintains a record for all first aid cases in the accident register and shall be readily available.

Fire Fighter

• Prevents fire damage by conducting surveys and inspections for hazards; enforcing codes.



- Prepares citizens to prevent fire damage by developing and conducting educational and training programs.
- Ensures availability of water at fire scene by testing hydrants; requesting and expediting repairs; verifying repair.
- Minimizes fire damage by responding to alarms; driving and operating equipment; regulating water pressure; combating and extinguishing fires; rescuing and reviving people.
- Ensures operation of equipment by completing preventive maintenance requirements; following manufacturer's instructions; troubleshooting malfunctions; notifying supervisor of needed repairs; evaluating new equipment and techniques.
- Maintains operations by following policies and procedures; reporting needed changes.
- Provides information by completing reports.
- Maintains technical knowledge by attending educational workshops; studying publications; participating in scheduled drills.
- Maintains fire station building, grounds, and related equipment by completing maintenance schedules.
- Contributes to team effort by accomplishing related results as needed.
- Provides first aid and firefighting services in case of any injury or fire and safely transports the person for further medical consultation if required,
- Immediately informs all reportable accident to the HSE Manager,
- Keeps proper follow up for all injuries and illnesses,
- Maintains the first aid facilities on site and attends to all injured Personnel at the worksite,
- Checks the first aid box to ensure that the contents are replenished regularly

Subcontractor Personnel:

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- All subcontractors will adopt the NWS Health & Safety Management System.
- Subcontractors shall appoint a full time HSE Officer to ensure that his personnel are following the safety program.
- Before commencing work, ensure compliance with health and safety policy and program and make it clear to employees that failure to do so could result in termination of contract.
- Coordinate all work activities through the site superintendent.
- Subcontractors personnel brought on site shall have undergone practical training and their services will be supported by relevant certificates.
- Subcontractors shall be responsible for the safety of their people.
- Subcontractors shall provide adequate safe tools, equipment for the job and necessary personal protective equipment for his personnel.
- Subcontractors shall inform about any incident/accident to the company and shall submit accident statistics periodically.
- Notify superintendent of any lost-time injuries, medical aid cases, and reportable occurrences on the Project.



• Cooperate in accident investigations.

Visitors:

- Visitors to plants and facilities shall follow the conditions specified in the (permit to enter).
- Follow the prescribed routes free from danger within the plants facilities.
- No visitor shall tamper or operate any plant machinery/Equipment.
- Visitors shall wear the minimum requirements of personal protective equipment applicable for the area.
- Visitors shall use the washing facilities provided in the plant to clean their hands before leaving the plant area.
- No visitor shall be left unattended in a hazardous area before or after office hours.

Accountabilities

- To follow the company HSE rules
- Wear PPEs as recommended

Department Heads

All Department Heads of the organization are responsible for the HSE in relation to the following:

- Maintain compliance to the HSE Policy and procedures through regular performance review;
- Conduct regular inspections of work areas under their responsibility in order to determine HSE risks (environmental aspects & impacts, and HSE hazards & risk), implement corrective actions; and arrange monitoring if required;
- Ensure that all employees under their responsibility, including contractors are appropriately inducted;
- Provide relevant HSE information and ensure training;
- Identify health monitoring needs, in consultation with the organization assigned physician;
- Maintain appropriate records;
- Ensure consultation with and active participation of subordinates and staffs;
- Investigate reported incidents and report to HSE Manager all actions to prevent similar occurrences.



MANAGEMENT RESPONSIBILITY (Flow Chart)



Reference: Procedure for Roles and Responsibilities, DOTS-IMSP-06



5.4 Consultation and participation of workers

5.4.1 General

Due to the nature of the IT Infrastructure, Information Technology Consultants and Software House in the UAE, prohibition of collective bargaining, and no unions in the UAE, the Company does not expressly encourage structured employee representation; but encourages free and mutually beneficial consultation and employee representation when changes are being introduced which affect employees in general.

These changes are related to: -

- Welfare Facilities
- Family Welfare Funds
- Life / Medical Insurance
- Health & Safety System
- Operational Procedures and System
- Performance Appraisals

5.4.2 Formation of consultation committee

The Top Management shall ensure that a Consultation Committee is established and maintained in the NWS to demonstrate its commitment towards the effective consultation with employees and all relevant stakeholders.

The appointed members of NWSHSE Management Consultation Committee are as follows:

- Senior Managers
- HR Manager
- min Manager/ In charge
- HSE Manager
- Supervisor

Nonetheless, the Employees voice as deduced from day to day interactions on sites and camps is reached to Executive Management through proper channels and appropriate actions are taken. For any queries or suggestions, all employees are free to contact the Executive Management and discuss. Any grievances of the workmen shall be communicated to the line Supervisor and they shall then resolved by the He Office HR Department.



The Executive Management operate an open-door policy; Should the employees feel their grievances are not resolved, the employees can approach He Office HR Department / Executive Management directly taking due permission to leave sites.

For start of any system which might require deduction of employee money, (such as welfare funds, etc), a survey is taken where the Employee is given a chance to either accept or reject the initiative; however, decision is taken based on the majority results of such surveys.

Consultation is a two-way process, allowing staff to raise concerns and influence decisions on the management of health, safety and environment. Your staff is often the best people to understand the risks in the workplace and involving them in making decisions shows them that you take their health and safety seriously.

Aside from your legal duty to consult, workplaces where staffs are involved in taking decisions about health, safety and environment are safer and healthier. Your staffs influence HSE through their own actions. They are often the best people to understand the risks in their workplace.

5.4.3 Participation and Consultation for HSE System

The HSE documentation has been developed by:

- contribution from employees and staff,
- guidelines on HSE by Clients,
- recommendations during second and third-party audits and
- Improvement actions taken during realigning our system to comply with HSEMS

The Company consults with the employees when:

- Risks to health and safety arising from work are assessed or when the assessment of those risks is reviewed;
- Decisions are me about the measures to be taken to eliminate or control those risks
- Introducing or altering the procedures for monitoring those risks
- Decisions about the adequacy of facilities and welfare of employees is being me and
- Changes are me that may affect the health, safety or welfare of the premises where the employee's works, to the system or methods of work or the plant and equipment or materials and substances used for work.

5.4.4 Consultation Methods

There are a number of different ways to consult with staff, each having different benefits and disadvantages, each entity should review their consultation needs and decide from this what the best method.

The different methods of consulting your staff include:



- face to face, directly with individuals;
- indirectly with staff: and
- With staff representatives.

Use a range of methods to suit the circumstances and use a combination if a single method is not suitable. There are various ways you can consult with staff face to face:

5.4.4.1 Involvement of Employees and relevant Stakeholders

It is ensured by their involvement in hazard identification, risk assessment and determination of controls, involvement and contribution during incident investigation and comments on Health and Safety Policy during induction training and group meetings and during major policy changes.

5.4.4.2 Suggestions of Employee & relevant Stakeholders

All employees and all relevant stakeholders and interested parties are encouraged to express their views and to contribute in a timely manner to the resolution of occupational health & safety and Environmental issues / improvements in operational system at the workplace. Best suggestions are acknowledged with a cash award and participation certificate.

5.4.4.3 Near Misses Feedback

Employees and stakeholders are encouraged to report Near Misses and give their feedback or suggestions. All the Near Misses and Suggestions given by employees, stakeholders and any interested parties are collected and summarized from sites. These reports are forwarded to the Management for selection of best contribution. Best feedbacks are acknowledged with a cash award and participation certificate.

5.4.4.4 Safety Award Scheme

Best Employee performance with regards to Health and Safety performance are rewarded with cash prize and certificate on the recommendations of the Safety Officer & operation Manager.

5.4.4.5 Training

Employees demonstrate their involvement with their participation in Company trainings, practice of emergency drills etc.

5.4.4.6 Campaigns/ Competitions

Employees are encouraged to participate in Campaigns and competitions in order to increase awareness of HSE Systems.

5.4.4.7 Regular walkabouts / HSE tours



All employees are encouraged to participate in the regular walkthroughs and share the information pertaining to risk and controls in the area.

5.4.4.8 Special workforce meetings

The whole workforce will be called together in this process for their views and opinions. This is in addition to regular team meetings. At large meetings, the exchange of views and ideas might not be as effective as in smaller gatherings where people may feel more comfortable sharing their views;

5.4.4.9 Notice Boards and Newsletters

Useful information will be shared as part of the consultation process, particularly if used together with other methods as this increases the chance of getting the messages across.

5.4.5 External Consultation

The Company ensures where appropriate, consultation with external parties such as specialist consultants, environment service providers, legal counsel, and government agencies about pertinent HSE matters and environment matters.

5.4.6 Consultation Program Requirements

The consultation process shall ensure at a minimum:

- effective consultation and participation of staff in HSE matters;
- appropriate involvement in risk management activities;
- appropriate involvement in HSE incident investigation;
- involvement in the development and review of HSE Policy and objectives;
- structure of consultation committees and meetings; and
- Consultation with contractors and other external stakeholders.

5.4.7 Consultation during Risk Assessment

Consultation shall be taken place among employees, workers, subcontractors, stakeholders and all relevant interested parties and staff during the risk assessment processes. The consultation shall be done at every stage like:

- new work processes, equipment or tools are being designed, purchased or modified (consult early to allow changes to be incorporated);
- identifying hazardous activities which require assessment;
- establishing priorities for the assessment of hazardous activities and during the risk assessment process;



- deciding on control measures to manage risk;
- reviewing the effectiveness of implemented control measures and identifying whether further hazards and risks are created by the chosen controls;
- Deciding the contents of HSE procedural documents.

5.4.8 Site HSE Notice Boards

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Site Safety Notice shall be used for the workforce, visitors and stakeholders' communication and consultation and shall be maintained periodically.

The notice board shall be clearly visible to all personnel working at the project site including contractors, suppliers, visitors etc. Safety signs shall be posted in the multilingual description as per the multicultural community working at site.

HSE department representative shall be responsible to maintain the notice board that shall contain as minimum;

- Education License
- Notification of Principal Contractor
- Operation Directory
- HSE Policy Statement
- Objectives and Targets
- Incident Reporting/ notifying procedure
- Site emergency and evacuation Plan
- Visitor's safety Instructions
- Site Safety Rules
- Mandatory PPEs
- Operation HSE Statistics
- Incentive Schemes/ ceremony etc.

Reference: Procedure for Communication & Consultation with Workers Procedure DOTS-IMSP-07



6.0 Planning

6.1 Actions to address risks and opportunities

6.1.1 General

While planning the HSE, CEO considers the context of the organization of NWS, needs and expectations of interested parties, and the scope of the HSE.

CEO with the coordination of HSE Manager/Management Representative will determine risks and opportunities related to the ability to give assurance that the HSE can achieve intended results, enhance desirable results, prevent or reduce undesired effects, department is compatible with the context of the organization, and can achieve continual improvement. Risks and opportunities related to the HSE are addressed according to the Procedure of Hazard Analysis and Risk Assessment for addressing Risks and Opportunities.

Reference: Procedure for Context of the Organization NWS-IMSP-04

6.1.2 Hazard identification and assessment of risks and opportunities

6.1.2.1 Hazard identification

Identify who is going to be harmed when work in a place every day it is easy to overlook some hazards, identify the ones that matter:

- Walk around the workplace and look at what could reasonably be expected to cause harm.
- Consult employees or the representatives what they think. They may have noticed things that are not immediately obvious.
- Visit the H&S website. H&S publishes practical guidance on where hazards occur and how to control them.
- Check manufacturers' instructions or data sheets for chemicals and equipment as they can be very helpful in spelling out the hazards and putting them in their true perspective.
- Analyze accident and ill-health records these often help to identify the less obvious hazards.
- Remember to think about long-term hazards to health (e.g. high levels of noise or exposure to harmful substances) as well as safety hazards.



6.1.2.2 Assessment of HSE risks

Decide who might be harmed and how

It is to be clear about who might be harmed for each hazard identified; it will help to identify the best way of managing the risk. That doesn't mean listing everyone by name, but rather identifying groups of people (e.g. people working in the storeroom' or 'passers-by'):

- Some workers have particular requirements, e.g. new and young workers, migrant workers, new or expectant mothers and people with disabilities may be at particular risk. Extra thought will be needed for some hazards;
- Cleaners, visitors, maintenance workers etc. who may not be in the workplace all the time;
- Members of the public, if they could be hurt by your activities;
- Consult staff if they can think of anyone that has been missed.

Evaluate the risks and decide on precautions

After the identification of hazards then decide what to do about them. The law requires doing everything 'reasonably practicable' to protect people from harm.

First, look at what are already in practice; think how the work is organized. Then compare this with the good practice and see if there are more controls required to bring the risk assessment up to standard. Consider:

- How to get rid of the hazard altogether?
- If not, how to control the risks so that harm is unlikely?
- When controlling risks, apply the principles below, if possible in the following order:
- Try a less risky option (e.g. switch to using a less hazardous chemical);
- Prevent access to the hazard (e.g. by guarding);
- Organize work to reduce exposure to the hazard (e.g. put barriers between pedestrians and traffic);
- Issue personal protective equipment (e.g. clothing, footwear, goggles etc); and
- Provide welfare facilities (e.g. first aid and washing facilities for removal of contamination).

Improving health and safety need not cost a lot. For instance, placing a mirror on a dangerous blind corner to help prevent vehicle accidents is a low-cost precaution considering the risks. Failure to take simple precautions can cost you a lot more if an accident does happen.



The level of risk is calculated by multiplying the Consequence Score and Probability of Occurrence together:

Risk = Consequence Score x Likelihood of Occurrence

<u>Involve staff</u>, so that you can be sure that what you propose to do will work in practice and won't introduce any new hazards.

The most pertinent information sources and techniques shall be used when analyzing consequences and likelihood. Sources of information may include the following:

- Past records;
- Practice and relevant experience;
- Relevant published literature;
- Economic, engineering or other models; and
- Specialist and expert judgments.

Techniques include:

- Structured interviews with experts in the area of interest;
- Use of multi-disciplinary groups of experts;
- Individual evaluations using questionnaires; and
- Use of models and simulations.
- Where appropriate, the confidence placed on estimates of levels of risk shall be included. Assumptions made in the analysis shall be clearly stated.

For the discharge or emission of a pollutant, evaluating factors such as those listed below should help in the assessment of relative consequence:

- Persistence;
- Toxicity;
- Health effects;
- Concentration of chemical;
- Volume discharged per event;
- Duration of the discharge;
- Proximity to water-bodies;
- Potential dilution;
- The area of land/marine waters affected; and
- Taking into account secondary consequences and existing mitigation measures.
- Regarding occupational health and safety, evaluating factors such as those listed below will help in the assessment of relative consequence:
- Health effect (e.g. long / short term effects, fatality, degree of injury / illness, disability); Damage to assets (e.g. plant, premises).



- The potential consequences shall be judged using all available information this information may include, but not be limited to:
- Control measures in place;
- Written systems of work, permit-to-work procedures for the tasks;
- Monitoring data from within and outside the entity;
- Tasks being carried out, their duration and frequency and locations;
- Machinery, powered hand tools to be used;
- Size, shape, surface character and weight of materials that may be handled; distances and heights to which materials have to be moved;
- Service used (e.g. Compressed gas), substances used or encountered during the work;
- Parties carrying out the tasks (training received); and
- Legal requirements.

Five levels of severity of consequences have been used as follows;

- Insignificant
- Minor
- Moderate
- Major
- Catastrophic

Analysis of Risk

Every reported hazard is analysed to decide how serious it is, and this is done by using the risk matrix, based on the knowledge and experience of the person(s) conducting the analysis.

The risk matrix is used to analyse the probability of occurrence (frequency) and severity of consequence or potential consequence, producing a rating as a code. The code is then classified into four (4) risk groups: low, moderate, high, and extreme risk. The level of risk is indicative of how much effort and urgency must be put in to controlling the problem

6.1.2.3 Assessment of HSE opportunities and other opportunities

NWS established, implemented and maintained a procedure to assess:

- HSE opportunities to enhance HSE performance, while taking into account planned changes to the organization, its policies, its processes or its activities and:
- opportunities to adapt work, work organization and work environment to workers;
- opportunities to eliminate hazards and reduce HSE risks;
- Other opportunities for improving the HSE management system.
6.2 Risk Management

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Commitment to HSE at NWS is reflected through HSE risk management process, which is an integral part of business planning and execution. HSE Risks are assessed for each and every activity at NWS while assessing risk; it is ensuring that relevant factors are taken into consideration. CEO along with NWS department managers conducts regular reviews of business process, activities, IT Infrastructure, Information Technology Consultants and Software House etc. to identify and prioritize the HSE risks and impact.

Reviews are also initiated as a result of significant change to corporate structure, infrastructure, business plan or any changes due to legislation.

The CEO, in consultation of NWS Department Heads, staffs, employees, contractors and stake holders, shall identify those hazards that are present in the NWS offices, buildings, facilities, sites, events and activities; and shall assess the risk of each identified hazards and control measure are taken in accordance with the hierarchy of control:

Health & Safety Hierarchy of Control Measure is as follow:

- Eliminate
- Reduce
- Isolate
- Control
- Personnel Protective Equipment
- Discipline



6.3 Aspects and impacts

NWS's commitment to demonstrate through the implementation of HSE Policy, adopting and promoting practices that are focused on the continual improvement of the environmental performance and is consistent with the applicable environmental regulations. The desired results are achieved through planned, Environment, and consistent efforts involving every element of the activities.

Based on the environmental concern and applicable regulatory requirements, significant aspects CEO is determined with the concern department and appropriate control measures are applied.

The CEO is responsible for keeping the information concerning identification and evaluation of aspects up-to-date. Process for identification & evaluation of aspects and impacts, including the application of appropriate control measure is defined and documented.



6.3.1 Environmental Hierarchy of Control

Environmental Hierarchy of Control Measure is as follow:

- Avoidance
- Source Reduction
- Reuse
- Recycle
- Recovery of Energy
- Treatment/ Containment/ Disposal

Pollution Prevention (Source Reduction) Re-Use Recycling Treatment Disposal Release

Environmental Protection Hierarchy

6.4 Risk and Impact Implementation and Monitoring

The CEO shall record any action that has been taken to remove or mitigate the risk on the related hazard identified.

NWS all employees are responsible to implement all control measure related to their work place hazard. The CEO shall ensure that all controls are implemented and that the effectiveness is reviewed and monitored.

The CEO shall ensure that all records of the identification, assessment and control process of HSE risks are maintained in the organization. Depending upon the magnitude of risks and the potential consequences of hazards, the risk assessment shall be periodically reviewed by along with staff.

This review shall verify whether changes have occurred as per the implementation of control measure.

Reference: Procedure for Hazard Analysis and Risk Assessment NWS-HSEP-01

6.5 Legal and Other Requirements

CEO has identified the legal requirements concerning HSE which are relevant to operations and activities within the organization. CEO in coordination with the department shall identify all legal and other requirements.

All identified legal and regulatory requirement details will be logged in at a central point in the "Legal Register" A procedure is established, implemented and maintained for identifying, complying, communicating and updating the requirements.

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It shall be the responsibility of the CEO to communicate to and/or allow access to HSE legislations and other requirements, all staffs, internal Legal compliance team, External legal affair's bodies, Consultant, contractors, stakeholders.

All applicable legal requirements shall be compliance in the NWS and Compliance record will be maintained within the division. CEO and HSE Manager shall ensure that all required permits, certificates and licenses required by relevant authorities are obtained and secured in a timely manner.

Applicable Legal & Regulatory Requirements are as follows but no limited to;

- Federal Law No 8 of 1980
- Federal Law No 24 of 1999
- Federal Law No 21 of 2005
- Ministerial Order No 37/2 of 1982
- Ministerial Order No 32 of 1982

Reference: Procedure for Legal & Other Requirements NWS-HSEP-02

6.6 HSE objectives & planning to achieve them

HSE Objectives and targets shall be developed by CEO with the coordination of department. In developing the HSE objectives, targets and KPIs, the CEO shall ensure that these are SMART (Specific, Measurable, Attainable, Realistic and Time-bounded).

Once the HSE objectives, targets & KPI's has been developed, CEO shall ensure that HSE objective targets and KPI's are effectively communicating to all relevant employee of the DOTS.

NWS shall ensure that appropriate HSE Programs are established and implemented in such way as to achieve the set objectives, targets and KPIs. Resources, responsible persons, due dates & time frames are clearly defined for every program to be implemented.

Measurable Project specific objective will be established by NWS which is consistence with the HSE and Legal requirements. Consultant and contractor are responsible to compliance all the requirement on the Site. During the progress meeting the entire objective will be review and monitored.

The CEO along with HSE Manager are responsible for monitoring the progress and status of achieving the HSE Objectives, Targets & KPIs on a quarterly basis through updated information and reports submitted regularly by each person responsible for achieving it.

Results of achieving the HSE objectives, targets & KPIs shall be discussed during the Management Review Meeting on an annual basis. Inputs related to the status of achieving the



HSE objectives, targets & KPIs are presented to the Top Management and appropriate actions plans are established and carried out in case a specific objectives and targets has not been met.

Reference: Procedure for Objectives & Targets NWS-IMSP-08

6.7 Planning of changes

When the CEO determines a need for changes to the HSE, CEO takes responsibility to carry them out in a planned manner. Management of change is applicable whenever there are changes in the process, activities, new equipment, new software, man power, services and new regulations as a result of assessment, analysis and monitoring.

HSE Manager determines a need for changes in the HSE they will forward the request to CEO after the approval from department.

These changes are communicated to employees by way of sending Emails, memorandum and circulars highlighting the changes made that affect the suitability of overall process.

7.0 Supports

7.1 Resources

NWS determine and provide resources needed for establishment, implementation, maintenance, and continual improvement of the HSE.

7.1.1 General

As part of NWS strategy, current levels of resources will be reviewed in line with company objectives and forth-coming business levels. The concept of this process is to continually improve and meet or exceed our customers' expectations and continual improvement of HSE.

To ensure that all personnel are adequately qualified, job-related training will be in IT Infrastructure, Information Technology Consultants and Software House. Appropriate records of all such training will be maintained in accordance with the requirement of HSE. The company will provide training for all employees in the skills and knowledge, Customer requirement and legal requirement required to carry out their duties safely, efficiently and to the desired standard.

7.1.2 People

Personnel performing work affecting conformity to IT Infrastructure, Information Technology Consultants and Software House requirements shall be competent on the basis of appropriate education, training, skills and experience.

7.1.3 Infrastructure

Departmental managers are responsible for identifying the needs and requirements for new, and/or modification of existing infrastructure and facilities in their departments. This infrastructure includes the building, workshop, machineries and other supporting services.

The CEO will ensure that the staff supports the requirements to maintain a safe working environment supported with a good standard of housekeeping within the facility.

7.1.4 Environment for the operational processes

Employees are the most valuable assets for our organization. We believe any employee can contribute to HSE only when he is comfortable and satisfied in his job and with their work environment. The Management reviews the suitability of the work environment needed to achieve the conformity to IT Infrastructure, Information Technology Consultants and Software House requirements and to enhance the organizational capability in achieving the HSE Policy, HSE Objectives and the Customer Satisfaction, through planned periodic Management reviews.



NWS will provide a clean, safe and adequately lit working environment to achieve the desired working environment for all employees.

7.1.5 Monitoring and Measuring Resources

Management actively seeks the valued opinions of its customers through customer feedback, assessment and reporting during the management review. This information is collated. The survey obtains the customer's perspective and expectations. Based on the outcome of the review, necessary corrective action is planned and implemented to enhance customer satisfaction level and to achieve continual improvement of the services offered by the organization.

Reference: Procedure for Monitoring & Reporting NWS-HSEP-04

7.1.6 Organizational Knowledge

NWS fulfil requirements for the handling of organizational knowledge in the following four phases, which are analogous to the PDCA cycle:

- Determine the knowledge necessary for the IT Infrastructure, Information Technology Consultants and Software House of processes and for achieving conformity of services
- Maintain knowledge and make it available to the extent necessary
- Consider the current organizational knowledge and compare it to changing needs and trends
- Acquire the necessary additional knowledge.
- NWS always considers Organizational knowledge gained from:

Internal sources (e.g. intellectual property; knowledge gained from experience; lessons learned from failures and successful projects; capturing and sharing undocumented knowledge and experience; the results of improvements in processes, and services);

External sources (e.g. s standards; academia; conferences; gathering knowledge from customers or external providers)



RESOURCES (Flow Chart)



7.2 Competence

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Competence of employees will be conducted in accordance with the requirements of the standard. This is based on four principles; commitment, planning, action, evaluation, further defined as follows:

- NWS dispose the necessary staff with the needed knowledge and skills, organizational infrastructure, and financial resources for establishing, implementation, and improvement of the HSE.
- In cases where it is deemed necessary and justified, NWS will hire competent external personnel and organizations from relevant fields for realization of activities for which the organization does not have adequate resources.
- Department Managers are responsible for identifying the needs and conducting professional training of employees who carry out activities that may have a significant impact on the HSE of service and customer satisfaction.
- Each organizational part manager / process owner is responsible for the suitable competency of his workers, on the basis of education, training, and / or work experience, in accordance with the requirements of their work.
- The method of ensuring the necessary competencies for roles, responsibilities, and authorities for implementation and control activities within the HSE was established in accordance with the Training and Awareness Procedure. Records of completed training and effectiveness are kept by the management representative.

7.3 Awareness

NWS ensure that persons doing work under the organization's control are aware of:

- The HSE Policy;
- Relevant HSE objectives;
- Their contribution to the effectiveness of the HSE, including the benefits of Improved performance;
- The implications of not conforming to the HSE requirements

Reference: Procedure for Training and Competency NWS-IMSP-09

7.4 Communications

7.4.1 Internal Communication

NWS have established mechanism for internal communication throughout various levels of the company. All HSE related communication is recorded by concerned department to all employees in coordination with MR. The medium of communication can be memos, facsimile, e-mails notice boards, meetings and trainings etc.



Internal Communication

From	То	Mode of Communication	Agenda	
Operation	Supervisors	Personal discussion	➤ Matters related to	
Manager		Telephone	Business	
		➤ Written documents	➤ Staff welfare &	
		/ memos	deployment	
			➤Work progress and	
			decision	
			≻ ISO-14001 Env.	
			≻ ISO 45001:2018 H & S	
Operation	Departmental	Official Meetings	Department related	
Manager	Manager-HO	By personal briefing	progress, difficulties,	
		Telephone Media	solutions to problems	
		Written Documents	etc.	
		Displays	≻ ISO-14001 Env.	
		≻ ISO 45001:2018 H & S		
Operation	Site Staff	Personal meeting	➤ Work/site progress	
Manager		Group briefing	➤ Site problems & their	
		Telephone media	solutions	
		≻ Written	Employee Welfare	
		Communication	Work environment	
			≻ ISO-14001 Env.	
			≻ ISO 45001:2018 H & S	

7.4.2 External Communication

The external communicate with external parties with regards to HSE shall be recorded on external communication register. The external parties can be the following:

- Government authorities
- Client and contractors
- Visitors suppliers and members of the public

The medium of communication can be memos, facsimile, e-mails, meetings etc. Communication with top management includes the following, but not limited to:

- Quarterly HSE Performance Reports
- External Audit Reports and details of actions taken
- Incident Investigation Reports
- Customer feed Back and complain



This will be done through Manager with the assistance of HSE Manager. The HSE Manager shall ensure the communication is done in timely manner.

Communication with suppliers / visitors and contractors shall be done by HSE Officer in coordination with MR. Medium of information can be memos, trainings, meeting, notice boards and verbal instructions. Information shall include but not limited to:

- HSE Policy of NWS
- HSE risk associated with activities and control measure
- HSE Requirements of NWS
- Legal and other requirements
- Emergency arrangements
- Change to the HSE or legal requirements etc.

Reference: Procedure for Consultation & Communication NWS-IMSP-07

7.5 Documented Information

7.5.1 General

Documented information of the HSE is carried out through the following documents:

- HSE Policy, HSE Objectives
- HSE Manual
- Procedure for Document and Record Control
- Documents, including records, required by ISO 14001 and ISO 45001:2018
- Documents, including records, which NWS have determined to be necessary.

7.5.2 Creating and Updating

All HSE system documents and data maintained by the organization on its computer systems are regularly backed up with secure copies. Important documents and data will be reviewed and approved for adequacy prior to issue. A master set of documents is established. This control will ensure that:

- The correct issues of appropriate documents are available at all locations where activities essential to the effective functioning of the HSE are performed;
- Obsolete documents are promptly removed from all points of issue or use, or otherwise assured against unintended use;
- Any obsolete documents retained for legal and/or knowledge-preservation purpose is suitably identified.
- External documents are recorded and expiry dates noted, it is the responsibility of the Management Representative to ensure that external documents are kept current.



Changes to controlled documents and data will be reviewed and approved by the same person that performed the original review and approval, unless specifically designated otherwise. The designated person will have access to pertinent background information upon which to base their review and approval. Where practicable, the nature of the change will be identified in the appropriate document attachments.

7.5.3 Control of document information

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Water & Wastewater Solutions

A documented procedure is established and implemented throughout the organization for control of documents in line with ISO 14001 and ISO 45001:2018 sub clause 7.5.3 Control of Documents, to ensure that:

- The documents are established and the authority / responsibility for preparation, identification, and review for adequacy, approval, re-approval and issue are defined.
- Legibility and clarity of HSE documents are ensured.
- External originated documents are identified. The circulation and usage are controlled according to their importance and applicability
- Invalid and obsolete documents are withdrawn from all points of issue or use to prevent unintended use.
- Any obsolete documents retained for legal/ knowledge / historical purpose / preservation purposes, are suitably identified.
- The HSE Manager will maintain a Master list of Procedures, Work instructions, forms etc. A record is maintained for documents issues mentioning the issue date, and the name of the person holding the document.
- All approved and amended documents will be issued to the respective persons. The superseded pages shall be destroyed by the copy holder.
- Amendment records are maintained suitably on the documents.

NWS has established a procedure that describes how HSE records are identified, filed, safeguarded and maintained, either as hard or soft copies. This is to ensure their safekeeping and subsequent ease of retrieval. HSE records are retained for a minimum period of three years, after which they may be archived or destroyed. HSE Records stored on computer file are backed up periodically.

Reference: Procedure for Control of Documents & Records NWS-IMSP-01



8.0 Operations

8.1 Operational planning and control

NWS has identified and planned all work IT Infrastructure, Information Technology Consultants and Software House that are associated with the identified significant environmental aspects and hazards consistent with its HSE Policy, HSE objectives and targets, in order to ensure that they are carried out under specified conditions, by establishing, implementing and maintaining a documented procedure to control situations where their absence could lead to deviation from the HSE Policy, HSE objectives and targets, and stipulating the work criteria in the procedure, and establishing, implementing and maintaining procedures related to the identified significant environmental aspects and hazards of goods and services used by the organization and communicating applicable procedures and requirements to suppliers, including contractors and other visitors in the workplace.

8.1.1 General

The organization planed, implemented, control and maintained the processes needed to meet requirements of the HSE Management System, and to implement the actions determined in:

- establishing criteria for the processes;
- implementing control of the processes in accordance with the criteria;
- maintaining and retaining documented information to the extent necessary to have confidence
- that the processes have been carried out as planned;
- Adapting work to workers.
- At multi-employer workplaces, the organization shall coordinate the relevant parts of the HSE management system with the other organizations.

Reference: Procedure for Control of Operational Control NWS-HSEP-10

8.1.2 Eliminating hazards and reducing HSE risks

The organization established, implemented and maintained a process for the elimination of hazards and reduction of HSE risks using the following hierarchy of controls:

- eliminate the hazard;
- substitute with less hazardous processes, operations, materials or equipment;
- use engineering controls and reorganization of work;
- use administrative controls, including training;
- Use adequate personal protective equipment.

Reference: Procedure for Hazard Analysis and Risk Assessment NWS-HSEP-01

8.1.3 Management of change

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When the Chief Executive Officer determines a need for changes to the HSE, Chief Executive Officer takes responsibility to carry them out in a planned manner. Management of change is applicable whenever there are changes in the process, activities, new equipment, new software, man power, services and new regulations as a result of assessment, analysis and monitoring.

HSE Manager determines a need for changes in the HSE they will forward the request to Chief Executive Officer after the approval from department.

These changes are communicated to employees by way of sending Emails, memorandum and circulars highlighting the changes made that affect the suitability of overall process.

Reference: Procedure for Management Change NWS-HSEP-08

8.1.4 Procurement

4.1 General

The purchases are made only from those suppliers who have been evaluated and approved. Except for purchase made for trial orders and for development material that are not intended for delivery to customer.

4.1.1 Suppliers

Only evaluated & approved list of suppliers are used for procurement of material, goods, products and services.

4.1.2 Supplier Categories

Suppliers are categorized according to the nature of goods, materials & services they Provide.

4.1.3 Evaluation

Suppliers are evaluated according to the nature of the material, goods, products & services they offer.

The general characteristics for supplier's evaluation are as follows but not limited to:

- On time delivery of the product ordered
- Records of the suppliers previously demonstrate capability
- Credit facilities



- Product quality and rates
- Market repute
- History & Experience
- Safety
- Capacity

The evaluation of each supplier is outlined on the approved supplier's list. The Purchase Manager is responsible for co-ordination, evaluation and review of suppliers for the approved supplier's list.

Management Representative summarizes supplier's performance for management consideration and retains suitable records (e.g. assessment reports, inspection reports, receipt inspections,) detailing the evidence of evaluation for each supplier.

Note:

- Where purchase has a minor impact on the final item and supplies the abundant then a percentage in coming inspection may be carried out as the basis for assessment.
- In the case of monopoly supplier, proprietary items or license agreements, no assessment is under taken however ongoing review and receiving inspection still carried out.

4.1.4 Approval and Ongoing Review

Following a successful evaluation, the successful supplier is placed on the approved supplier's list.

A supplier's performance is re-evaluated once in a year during management review to ensure that the supplier continues to comply with the company's purchasing and HSE requirements & standards.

History of all suppliers is maintained for their review except the service category, which is discussed in the review meeting if required.

4.1.5 Dispute

Where late or defective goods, material or services are received, action is taken to record the problem and the Purchase Manager addresses the matter to the supplier.

Where that matter is unresolved, that the supplier continues to supply late or defective items or is unwilling to make efforts to improve performance, the name of the approved supplier in the list is marked to indicate that vendor is not to be used.

4.2 Purchasing

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Generally, IT and automation related material is the major item, in this regard the Purchase Manager calls the approved suppliers for samples and if the sample meets the company requirements after inspection and testing then Purchase Manager takes the further action according to this procedure.

The Accountant prepared purchase order whereas for the purchasing of other items only the demand form is used which is made by the relevant personnel, which is then directly dealt by the accounts department.

4.2.1 Quotations

The Purchase Manager can ask to Accountant for quotation from potential suppliers if he thinks necessary and he will decide it whether to purchase it or not.

4.2.2 Purchase Order

Accountant prepares and issues purchase order, which is approved by the Purchase Manager or his nominee prior to processing. This is our process minimum two thousand above amount buying things we are issuing the purchase order. Less and small things we are not issuing the purchase order.

The purchase order may include the following details such as:

- Description of the product (Item, Quality, Quantity) and its Specification.
- Terms & Conditions
- Delivery date
- Price
- Any other requirement

4.2.3 Purchase Order Verification

Upon receipt of a purchase order, Store Supervisor verifies the quantity, quality, damage, and identifies the accept /reject receiving status on the received parts by placing it in allocated places. Gate office In-charge completes the general inspection form in case of general items whereas Laboratory In-charge completes the inspection report of Incoming Goods. All the items, which are purchased, are recorded on gate pass as well as in gate pass register.

4.2.3.1 Verification at Suppliers Premises

In case the purchased material is to be verified at supplier's premises, Purchase Manager contacts the supplier and makes the necessary verification arrangements. A team of representatives from purchase department and quality control department visits the supplier's



premises and performs the verification activities. The verification results are recorded on the inspection report.

4.2.3.2 Verification of Customer at Suppliers Premises

Arrangements can be made for customer's verification at supplier's premises if contractually agreed upon. These arrangements include schedule of customer visits, verification arrangements and acceptance criteria. The customer's verification at Suppliers premises, however, does not absolve the company of its verification of purchased products supplied by the Suppliers.

Reference: Procedure for Purchasing NWS-IMSP-10

8.2 Control of emergency situation.

HSE Manager along with Top Management is responsible for identifying the potential emergency situations. The potential emergency situations that are identified are follows:

- Natural hazards (e.g. earthquake, flood, storm, Severe Weather);
- Transport/ Road Traffic Accidents Incidents;
- Bomb Threat;
- Environment;
- Fires or explosions
- Biological agents release, public health hazards
- HSE Incidents involving serious or fatal
- Robbery/ Assault/ Terrorism

The emergency preparedness and response plan are reviewed and tested at least once in a year with third party. Additionally, this shall be reviewed immediately after occurrence of an accident/incident. The responsibility of preparation and implementation lies with the HSE Manager in consultation and coordination with the third party.

The company's emergency preparedness and response plan are communicated to all employees by displaying it at identified locations.

A documented procedure is established, implemented, and maintained to ensure effective implementation of this requirement.

Reference: Procedure for Emergency Preparedness & Response NWS-HSEP-03



9.0 Performance Evaluations

9.1 Monitoring, measurement, analysis & evaluation

9.1.1 General

The effectiveness of the Integrated System is monitored by internal audits and by measuring HSE performance and customer satisfaction. Results of these activities are reported to the top management and are used to identify opportunities for improvement. Activities related to internal audits and to measuring customer satisfaction and HSE performance are further defined in this manual.

Statistical techniques may be applied to:

- Evaluation of measurement systems; and
- Analysis of HSE performance and other company-level data.

Departmental managers are responsible for identifying the need for using statistical techniques in their departments and in other activities for which they are responsible.

9.1.2 Analysis & evaluation

Data and information recorded in records are compiled and analyzed periodically to determine trends in the performance and effectiveness of the Health, Safety and Environment Management System and to identify opportunities for improvement.

The following categories of information and data are recorded, compiled, and analyzed:

- Conformance to customer requirements
- Suppliers Performance
- Customer satisfaction and dissatisfaction
- Integrated System:
- Effectiveness of training
- Effectiveness of Integrated system

9.1.3 Evaluation of Compliance

A detailed register of legal & regulatory and other requirements is maintained to demonstrate NWS commitment to comply with all applicable legal & regulatory requirements and other requirements to which NWS subscribes. The compliance to the same is verified through the internal audit.

Reports pertaining to evaluation of compliance shall be submitted to leadership. Wherever deviations are observed, a Corrective Action Request is raised. Appropriate corrective action



shall be planned by the respective Functional Head/ Manager and the nonconformities shall be closed. The effectiveness of the corrective action is verified by the HSE Manager. The compliance report is discussed in the management review meeting.

Reference: Procedure for Monitoring & Reporting NWS-HSEP-04

9.1.4 Incident Investigation

NWS ensures that all incidents and deviations occurring within the workplace under its control are recorded, investigated and analyzed in order to determine deficiencies related to occupational health & safety practice within NWS. This includes other factors that is causing or might be contributing to the occurrence of incidents. A documented procedure is established, maintained, and implemented for handling incidents and potential nonconformity related to occupational health & safety.

An incident investigation team may be constituted having considered the competency levels of the investigators for the investigation and analysis of incidents by the HSE Manager, depending upon the nature and magnitude of the incident. The investigation is carried out to determine the underlying causes of incidents. Based on the findings, HSE Manager shall implement the actions to prevent similar events from occurring. The focus of investigation will be to obtain the facts and not to put the blame anyone. The team and the investigative process shall clearly deal with all the involved individuals in a fair, open and consistent manner.

All investigations shall be carried out in a timely manner. Incident investigation is carried out through interview of individuals who were present at the location during the time of incident, by analyzing the scene of incident, by taking photograph wherever appropriate or through any other means.

Results of the detailed incident investigation is recorded in a documented report and submitted to the Top management for review. The purpose of this is to:

- Identify the need for corrective action,
- Sharing the outcome with staff to create awareness;
- Identify opportunities for continual improvement;

Investigation report is maintained by the HSE Manager as part of health & safety records. Results of the investigations are communicated to all employees with the intention.

Reference: Procedure for Accidents & Incidents Investigation & Reporting NWS-HSEP-09

9.2 Internal Audit

NWS conducts internal audits at planned intervals to determine whether the HSE conforms to the planned arrangements for service provision, to the requirements of the ISO 14001:2015 and



ISO 45001:2018 standards, to NWS's HSE requirements and to determine if the Health, Safety and Environment Management System is effectively implemented and maintained.

The Internal Audit Process details the requirements for the audit program including requirements that the audit program shall be planned, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits.

The audit criteria, scope, frequency and methods shall be defined. Selection of auditors and conduct of audits shall ensure objectivity and impartiality of the audit process. Auditors shall not audit their own work.

The HSE Manager/Management Representative is responsible for the Internal Audit Program and minimum once in a year organizations have conduct an audit. The responsibilities and requirements for planning, conducting audits, reporting results and maintaining records are further detailed in the Internal Audit Procedure.

The manager responsible for the area being audited shall ensure that actions are taken without undue delay to eliminate detected nonconformities and their causes. Follow-up activities shall include the verification of the actions taken and the reporting of verification results as indicated in the Corrective Action Procedure.

The NWS management will evaluate any necessary correction in processes/procedures to avoid recurrence of nonconformities.

Reference: Procedure for Internal Audit NWS-IMSP-02

9.3 Management Review

9.3.1 General

The Management review is carried once in a year, following the internal audit carried out by qualified internal auditors.

This demonstrates the commitment and method for:

- Review of the implemented system
- Review of continuing suitability and effectiveness
- Determining the frequency of review and audit
- Review Inputs and Outputs
- Records of evidences

Participants of the Management Review will consist of respective department heads

9.3.2 Management review inputs

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The efficiency and effectiveness of HSE is evaluated by considering the customer needs and organizational expectations.

The inputs considered for Management Review are as follows:

- a) The status of actions from previous management reviews;
- b) Changes in external and internal issues that are relevant to the Health, Safety and Environment Management System;
- c) Information on the performance and effectiveness of the Health, Safety and Environment Management System, including trends in:
 - The needs and expectations of interested parties;
 - The extent to which HSE objectives have been met;
 - Information on the HSE performance, Process performance and conformity of products and services;
 - Nonconformities and corrective actions;
 - Monitoring and measurement results;
 - Results of evaluation of compliance with legal requirements and other requirements;
 - Audit results;
 - The performance of external providers;
 - Significant environment aspects, hazard and risk assessment
 - HSE Objective and target.
 - Legal and other requirement.
 - Incident status
 - Consultation and participation of workers
 - Communication(s) with interested parties;
- d) The adequacy of resources for maintaining an effective HSE;
- e) The effectiveness of actions taken to address risks and opportunities;
- f) Opportunities for continual improvement

9.3.3 Management review outputs

Management review outputs as a minimum will consist of the following:

- Improvements of the effectiveness of the HSE and the processes
- Service improvements related to customer requirements
- Resource needs and their management

The copy of the minutes will be circulated to all participants / concerned. Reference: Procedure for Management Review NWS-IMSP-05

10.0 Improvements

10.1 General

The defined HSE is aimed at continuous improvement in all processes, achievement of customer satisfaction and growth of the organization, environment and health & safety issues. Various control mechanisms used for measuring the performance are aimed to identify the weakness in the system and hence for improvements. Procedures are established for corrective actions (improvement actions), which are communicated throughout the organization.

10.2 Non-conformity, corrective action

NWS will handle nonconformities in order to control and correct them and deal with the consequences. NWS will establish a corrective action system to investigate and document the root cause and actions to correct supplier, internal, customer, Incident, environment reported nonconformities.

Corrective actions will be assigned to a responsible individual and tracked by number and completion date.

Corrective action is used as a tool for improvement. The significance of the problem is evaluated and the root cause is determined. Suitable corrective actions are planned and implemented. A documented procedure is established and implemented detailing the following:

- Review of non-conformities arising from all areas of HSE.
- Determining the cause of non-conformities and suitable corrective action.
- Evaluation of the proposed action to ensure that the non-conformance will not reoccur.
- Implementation strategies
- Review and verification of action initiated

When any non-conformance within the HSE, including customer complaints and incident, is identified, the cause is determined and eliminated with appropriate corrective action as per defined procedure. Corrective actions are reviewed to monitor their effectiveness and are subject of regular management reviews. All corrective actions are recorded and periodically analyzed to establish the need for any preventative actions.

Reference: Nonconformity and CA NWS-IMSP-03

10.3 Continual Improvement

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Management seeks continual improvement of the organization's processes and of its overall performance. Management considers the HSE as an effective tool for the staff to identify and manage improvement activities, which include:

- Planning improvements with use of the objectives,
- Use of HSE Policy
- Evaluation of audit results and performance data,
- Resolutions of identified problems through corrective actions,
- Driving strategic improvements through management reviews.

NWS are committed to the concept of continual improvement through constant refinement and improvement of this HSE.

Reference:	Nonconformity and CA	NWS-IMSP-03
	Continual Improvements	NWS-IMSP-12