Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

HEALTH, SAFETY & ENVIRONMENT (HSE) PLAN

Rev.	Date	Nature of Changes	Approved By	Signature
0	28/02/09	Original issue	Vassily Oye Barberopoulos	Mo
1	27/08/09	Second Issue	Vassily Oye Barberopoulos	1105
2	21/01/10	Third issue	Vassily Oye Barberopoulos	Mo
3	10/05/11	Fourth issue	Vassily Oye Barberopoulos	MS
4	18/10/12	Fifth issue	Vassily Oye Barberopoulos	Mo
5	28/08/14	Sixth issue	Vassily Oye Barberopoulos	MAY
6	27/05/16	Seventh issue	Vassily Oye Barberopoulos	MO
7	30/11/16	Eight issue	Vassily Oye Barberopoulos	Mo
8	24/08/17	Ninth issue	Vassily Oye Barberopoulos	Alto
9	30/04/18	Tenth issue	Vassily Oye Barberopoulos	Atto
10	22/06/18	Eleventh issue	Vassily Oye Barberopoulos	Alos
11	12/11/19	Twelfth issue	Vassily Oye Barberopoulos	Are
12	29/04/21	Thirteenth issue	Vassily Oye Barberopoulos	Aro
13	18/12/2021	Fourteenth Issue	Vassily Oye Barberopoulos	Arts
14	07/11/2023	Fifteen Issue	Vassily Oye Barberopoulos	Ars

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 671600		MWAHSE001- PLN
Revision: 14 Discipline : HSE		Rev. Date : 07-11-2023

REVISION HISTORY

Rev	Section	Description	Page
14	7.2	Review of HSE targets, leading indicators and frequencies for HSE	10
		Walkthrough, HSE weekly meetings and HSE executive management	
		meeting	
13	All	Amendment of HSE Manager to HSE Officer to suit current practice	All.
12	7.1,	Amendment of section 7.1 from factory act from 1987 to 2004, Amendment of	8, 12, 15
	7.4.1,	HSE Committee meeting frequency, Inclusion of COVID 19 Control protocols in	, ,
	7.8.8.	the document.	
11	7.4.1	Revision of agenda of 7.4.1 of HSE Executive committee meeting minutes	12
10	7.8.3,	Amendment of frequency of Medical fitness test, inclusion of Control of	14, 15,
	7.8.8, 9.0	Substances Hazardous to Health (COSHH) to Section 7.8.8 of Material	18
		Safety Data Sheet (MSDS), inclusion of Medical Fitness Test-	
		MWAHSE118-F to section 7.8.3 and 9.0 Addendum	
9	4.1,	Inclusion of Definition of Risk Assessment in 4.1 Definitions, Amendment of	7,8, 10,
	6.0,	section 6.0 Key HSE Risk to replace JSA and Daily tool box talks with Risk	12,13, 14
	7.1,	Assessment and Pep talks covering sectional activities, Inclusion of Nigerian	
	7.2.3,	Electricity Supply and Installation Standards Regulations, 2015 to replace	
	7.4 1,	Electricity Supply Regulations, 1979, Wiring Regulations, 1979, Earthing Code of	
	7.5,	Practice, 1979 into section 7.1 Compliance with Law and Regulations, Inclusion of	
	7.6.1	HSE Weekly Meetings & Amendment of section 7.2.3 performance measurement	
		to reflect actual practice, section 7.4.1 amended, Modification of document to	
		ISO9001:2015 Management System Manual in section 7.5, Amendment of	
		Section 7.6.1 from MWAHSE006-PR Risk Management Procedure to reflect	
		(MWAHSE006-P) HSE Risk Assessment Procedure	
8	7.2.4.2,7.	Section 7.2.4.2 amended to Procurement Manager, Section 7.4.4 was amended to	11,14,15,
	4.4,7.4.5,	Tool Box Meeting, Section 7.4.5 Pep talk Meeting included to the document,	17,18,16,
	7.6.1,7.7.	Section 7.6.1 amended to MWAHSE006-PR, 7.7.1 was amended to include how	19
	1,7.7.2,7.	process waste is been managed, Fumigation was made 7.7.2 and included to the	
	9.5,7.10,	body of the HSE Plan, Section 7.9.5 was amended to be Safety Induction for	
	7.8.3,9.0	Visitors/Clients, Section 7.10 was amended to be Contractor/Sub-contractors,	
		Include "and approved Government Hospital." In Sections 7.8.3., Include forms,	
7	7.2 4.2	document and procedure in addendum in section 9.0 Sections 7.2 4.2 and 7.4.1 amended.	10 & 12
/	and 7.4.1	Sections 7.2 4.2 and 7.4.1 amended.	10 & 12
6	5.0,	Technical Manager was changed to Quality Assurance/Quality Control Manager in	7,10,11,1
U	7.2.4.2,	Sections 5.0, 7.2.4.2, 7.4.1 & 7.4.2.	2,14,15,1
	7.4.1,7.4.	Sections 7.8.3 &7.8.6 were modified and section 9.0 amended.	8,19
	2, 7.8.3,		0,22
	7.8.6 &		
	9.0		
5	7.2.3,7.8.3	Sections 7.2.3,7.8.3 &7.11.2 amended	9,14 &
	&7.11.2		18
4	7.2.3	Revision of Document	2 &9
3	3.0, 7.1	Sections 3.0, 7.1 & 7.2.4.2 were amended.	5,7,9
	& 7.2.4.2		, ,-
2	7.1, 7.2.3	The code MWAHSE-PLN for the Plan was change to MWAHSE001-PLN,	7,9
_	& 7.4.1	Sections 7.1, 7.2.3 & 7.4.1 were modified,	,,-
1	7.2.4.2,	HRM change to HR, Duties of HSE Reps were included in Section 7.2.4.2. Sections 7.8.3,	9,13,15,16
	7.8.3, 7.10.1,	7.10.1, 7.11.1 &7.12.4 were modified, Section 7.13 was removed.	

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 671600		MWAHSE001- PLN
Revision: 14 Discipline : HSE		Rev. Date : 07-11-2023

	7.11.1, 7.12.4 &7.13		
0	N/A	First Issue	N/A

STATEMENT FROM THE MANAGING DIRECTOR

At Metec West Africa Limited, we are conscious of the risks inherent in our work place. Therefore we are committed to eliminate or protect against situations that could lead to personal injury, occupational illness or damage to the environment:

- Adopt a policy for "ZERO tolerance" on accident and Incident.
- Clearly define HSE line management responsibilities and objectives.
- Identify and assess all significant HSE risks and place measures which eliminate or minimize these risks to a level, which is feasibly as low as reasonably practicable.
- Employ trained and qualified people; provide effective supervision, personnel performance appraisals and supplementary training as necessary to enable all employees to work safely.
- Take action when safety concerns are raised and to support anyone who stops the work if they believe it is unsafe.
- Visibly imbibe safety through our behavior, implement regular HSE tours, and communicate effectively all HSE messages.
- Promote open dialogue with personnel, and everyone working with Metec WA Limited with a view to achieving continuous improvement.

Everyone working for Metec WA Limited is encouraged to conduct himself/herself responsibly, respecting established rules and procedures, performing his/her job in a right and safe way, using personal protective equipment, stopping any work he/she considers as being carried out in an unsafe manner, reporting occurrence of incidents/accidents or unsafe act/ conditions and in so doing, ensuring that we continually strive for better HSE performance and help to shape an Injury and Incident Free Culture and Environment.

Yours,

Vassily Barberopoulos Managing Director

Health, Safety and Environment (HSE) Plan



Document Number:

MWAHSE001- PLN

Revision: 14 Discipline: HSE Rev. Date: 07-11-2023

Table of Contents

1.	PURPOSE	6
2.	FIELD OF APPLICATION	6
3.	HSE REFERENCE DOCUMENTS	6
4.	DEFINITIONS AND ABBREVIATIONS	6
4.1	Definitions	6
4.2	Abbreviations	7
5.	RESPONSIBILITIES	7
6.	KEY HSE RISKS	8
7.	ACTIVITIES	8
7.1	Compliance with Law and Regulations	8
7.2 M	Nanagement Responsibilities	8
7.2.1	Leadership and Commitment	9
7.2.2	Policy	9
7.3	Communication and Awareness	12
7.3.1.	Safety Signs	12
7.4	Meetings	12
7.4.4	Tool Box Meetings	13
7.4.5	Pep Talk Meetings	13
7.5	Documentation	13
7.6	Safety Risk Evaluation and Management	14
7.6.1.	Overview	14
7.7	Respect for the Environment	14
7.8	Safeguarding of Health	14
7.8.1.	Personal Protective Equipment (PPE)	14
7.8.2.	Medical Facilities.	15
7.8.3.	Medical Fitness	15
7.8.4.	First Aid	15
7.8.5.	Drug & Alcohol Abuse	15
7.8.6.	Smoking	15

Health, Safety and Environment (HSE) Plan



Document Number:

MWAHSE001- PLN

Revision: 14

Discipline : HSE

Rev. Date: 07-11-2023

9.		ADDENDUMS
8.		APPENDICES
	7.13. P	erformance Improvement18
	7.12.	Records / Corrective Actions
	7.11.3.	Monthly & Weekly Reporting17
	7.11.2.	Analysis and Corrective Actions17
	7.11.1.	Incident Investigation
	7.11	Incident Analysis
	7.10.2.	Drills
	7.10.1.	Emergency System17
	7.10	Emergency Responses
	7.9.6.	Contractor/Sub-contractors
	7.9.5.	Safety Induction for visitors/Clients
	7.9.4.	Safety Induction for external visitors/contractors
	7.9.3.	Induction Training for new employees16
	7.9.2.	Extraordinary Training Requests16
	7.9.1.	Annual Training Plan16
	7.9	Competence and Training of Personnel
	7.8.9.	Material Safety Data Sheet (MSDS)
	7.8.8.	Covid-19 Control Protocol
	7.8.7.	Malaria Control Program15

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 071609		MWAHSE001- PLN
Revision: 14 Discipline : HSE		Rev. Date : 07-11-2023

1. PURPOSE

Metec WA has the responsibility on behalf of its employees and its clientele to meet the minimum requirements of HSE management and its performance expectations.

All work is carried out in accordance to the minimum requirements contained in this document and will be measured by specific Key Performance Indicators (KPI) set to measure success of compliance.

2. FIELD OF APPLICATION

The present document describes how the Company implements its HSE program for the production of Client Orders in line with their HSE requirements. As a "living document", the HSE Plan gets revised to reflect any improvement changes, both internal and external. By external changes, we mean changes in client's minimum HSE requirements, new legislation and all other pertinent issues.

3. HSE REFERENCE DOCUMENTS

This refers to all HSE related documents submitted by clients and considered in making amendments to the HSE plan.

4. <u>DEFINITIONS AND ABBREVIATIONS</u>

4.1 Definitions

•	Accident	An unplanned event or chain of events which results in loss (with harm) to people, damage to environment and/or loss to property/ production.
•	Anomalies	Any unsafe condition or act that could lead to an incident. Anomalies are incident factors.
•	Company	Metec West Africa Ltd.
•	Client	Any legal entity issuing a Purchase Order to the Company to produce goods and services.
•	Incident	An event induced by a combination of anomalies which results in something wrong taking place. An incident can be a "near miss" (no harm/damage) or an "Accident".

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 671609		MWAHSE001- PLN
Revision: 14 Discipline : HSE		Rev. Date : 07-11-2023

• Sub-Contractor Any legal entity providing services to the Company.

• Supplier Any legal entity or individual who provides the Company

with items it has ordered.

• Vendor Any legal entity identified in the Purchase Order as

supplying goods to the Company.

• Job Safety Analysis (JSA) studying and recording each step of a job, identifying

existing or potential job hazards (both safety and health), and determining the best way to perform the job to reduce

or eliminate these hazards.

• Risk Assessment The overall process of hazard identification, risk analysis, and

risk evaluation.

4.2 Abbreviations

HSE: Health, Safety and Environment Job Safety Analysis JSA **KPI Key Performance Indicators** Lost Time Injury Frequency Rate LTIF Nigerian Foundries Limited. NFL Metec West Africa Limited **MWA MSDS** Material Safety Data Sheet PPE Personal Protective Equipment Total Recordable Incident Rate. TRIR

COSHH Control of Substances Hazardous to Health.

5. RESPONSIBILITIES

The Managing Director is responsible for:

- Approving and endorsing the HSE Plan,
- Ensuring that resources are available to execute the HSE Plan,
- Monitoring and adjusting the HSE Plan.

The HSE Officer, as custodian of the HSE Plan has the responsibility for:

- Developing the HSE Plan.
- Monitoring the HSE Plan and reporting its status, deviations and any need for adjustments.
- Enforcing & coordinating the overall workings of the HSE Plan.
- Training all HSE Representatives and Quality Assurance/Quality Control Manager s on the HSE Plan, procedures & notifying all changes.
- Keeping the Managing Director immediately informed at all times on the occurrence of all accidents and anomalies together with all other HSE matters.

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 671609		MWAHSE001- PLN
Revision: 14 Discipline : HSE		Rev. Date : 07-11-2023

The Quality Assurance/Quality Control Manager has the responsibility for:

- Enforcing an accident free work environment.
- Enforcing the overall workings of the HSE Plan.
- Ensuring that the HSE Officer follows his/her responsibilities.
- Calling with immediate effect of an accident an HSE investigation meeting with all personnel involved.

All Employees are responsible in the implementation of the HSE Plan as required within their areas of work.

6. KEY HSE RISKS

KEY HSE RISKS	MANAGEMENT STRATEGY
Failure to manage HSE risks associated with	- Work place preparation upfront.
manufacturing in Nigeria.	- HSE representation at work place.
	- Approved HSE plans in place
	- Risk Assessment and Pep talks covering
	sectional activities.

7. ACTIVITIES

7.1 Compliance with Law and Regulations

Following are the requirements applicable:

- National laws and regulations in force.
- International laws and regulations when and where applicable.
- Industry guidelines, codes of practice, etc.

In all cases, the requirements of good business practices must be observed.

The Company complies with the following Nigerian laws and regulations, including but not limited to:

- Labour Act, 1971
- Workmen Compensation Act, 1987
- Factories Act, 2004
- Nigerian Electricity Supply And Installation Standards Regulations, 2015
- The National Environmental Protection Regulations, 1991.

7.2 Management Responsibilities

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

7.2.1 Leadership and Commitment

HSE matters are a line management responsibility requiring the active participation of all levels of management and supervision. Management provides visible, strong and pro-active leadership and commitment to develop, implement measure and improve the HSE Management System.

This is achieved through active participation in safety practices such as Management HSE walkthroughs, Safety meetings, Accident / Incident investigation, risk assessment and work site training etc.

The Management ensures availability of sufficient resources; competent personnel and HSE advisors who demonstrate this commitment and leadership as and when necessary.

7.2.2 Policy

The Company's HSE Policy meets the following objectives:

- Develops and pursues, through all stages of production, a systematic approach to risk reduction.
- Co-ordinates all health / safety/environment objectives taking into account economical constraints.
- Includes all activities within the general Sustainable Development Objectives of the Company's HSE.
- Ensures that all requirements are fully met, all hazards associated with each employee's job description is systematically identified and evaluated, as well as any related risk reducing measures. The overall goal is to reduce residual risks to a level that is As Low as Reasonably Practicably with respect to:

 (i) Protection of human life (ii) environmental impacts (iii) safeguarding of
 - (i) Protection of human life (ii) environmental impacts (iii) safeguarding of assets.

7.2.2 Performance Measurement

The Company has developed measurable HSE targets to monitor the performance of improvement of the HSE System.

HSE TARGETS

Lagging Indicators	Unit	Target/Annual
Lost Time Injury Frequency	Number of LTI x 1000000 /Number man hrs worked (Nhw)	0.45
Total Recordable Incident Rate	Total number recordable injuries x 1000000/ Nhw	1.25

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

High Potential Incident Frequency	Near misses of serious injury/fatality nature	0.06
incluent Frequency	Number of HPI x 1000000/ Nhw	
Number of	Any unsafe acts/situations	0.06
Anomalies reported	Number of Anomalies x 1000000/ Nhw	

Leading Indicators	Unit	Target	Frequency	Responsibility
Management HSE Walkthrough	% actual vs planned	75%	4 Walkthroughs /year	ME100
HSE Walkthrough	Actual vs planned	75%	8 Walkthroughs/year	HSE Officer
HSE Trainings	% actual vs planned	>65%	As per Annual Training Plan & Training request	HSE Officer, HRM
HSE Weekly Meetings	% actual vs planned	>75%	15 Meetings/year	HSE Officer
HSE Monthly Meetings	% actual vs planned	>65%	8 Meetings/year	HSE Officer
HSE Executive Meetings	% actual vs planned	100%	1 Meetings/year	ME 100

7.2.3 Organisation and Responsibilities

7.2.3.1 General

HSE responsibility is placed at all levels of the Company's organisation. The HSE Executive Committee is the top most body responsible for the design, change, application and implementation of the HSE Plan.

7.2.3.2 HSE Job Responsibilities

In addition to the general job descriptions outlined in the Company's Quality Management Manual, the following specific HSE responsibilities apply:

Managing Director has the overall responsibility for the implementation of the HSE Plan. He/she utilizes the HSE Executive Committee to enforce implementation, make changes to the plan, policies and rules. The HSE Officer provides the necessary assistance and guidance.

Quality Assurance/Quality Control Manager is responsible for all HSE activities in the Plant.

Production Manager deputizes for the Quality Assurance/Quality Control Manager when he is not present. The Production Manager is accountable for all HSE Foundry activities related to production

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 671600		MWAHSE001- PLN
Revision: 14 Discipline : HSE		Rev. Date : 07-11-2023

which include raw material preparation, die mould preparation, melting, pouring of metal, fettling and finishing.

Procurement Manager is responsible for the procurement of HSE consumables as requested by the HSE Officer. He/she informs the HSE Officer whenever sub-contractors/suppliers are within the factory.

Human Resource Manager is responsible for assisting the HSE Officer in setting up all the required training courses both planned and extraordinary.

Administrative Manager informs the HSE Officer whenever visitors are within the factory. Also He/She signs all HSE consumables as requested by HSE Officer.

HSE Officer provides assistance and guidance to all matters relating to HSE issues. He/she ensures a consistency of approach across all areas and phases of work and is responsible for ensuring that the design and operation of the Work facilities achieves the necessary levels of safety and environmental control. He/she is responsible for keeping all HSE representatives trained and up-dated on HSE matters on a collective basis. He/she review effectiveness of the HSE measures. Also he/she is responsible for the HSE Management System and ensures it complies with requirements of the HSE Plan. He/she is further accountable for the development and implementation of the HSE procedures and ensures that the Managing Director, Quality Assurance/Quality Control Manager are advised on all HSE risks and their implementation/control measures. The HSE Officer reports directly to the Managing Director and works with the Quality Assurance/Quality Control Manager.

HSE Representatives are the HSE Officer's lieutenants who are responsible to enforce the HSE Plan. They attend HSE meetings, identify and report hazards in the workplace through regular inspections, advice to employees on matters affecting HSE, causes of accidents/incidents, assist in HSE training and participate in any HSE audit. HSE Representatives report to the HSE Officer and have the responsibility of issuing to erring employees Disciplinary cards.

As an encouragement to HSE Representatives to carry out their responsibilities, a tri-monthly bonus system is set. The bonus depends on a score sheet of points earned based on how each Representative's faces his/her responsibilities.

Commercial Manager is accountable for all contract reviews with vendors and Sub-contractors. He/she is responsible to inform the Managing Director about all new HSE requirements by the Vendor and through the support of the HSE Officer.

Supervisors will provide the day-to-day HSE enforcement in their respective work sections. They will report via the HSE Representative(s).

All Personnel irrespective of function or role are responsible for HSE implementation commensurate to their expertise, work tasks and areas of activity. These responsibilities apply to all levels of the organization not only to Metec WA personnel but also to Sub-contractors and Vendors personnel who provide support and other services.

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 671609		MWAHSE001- PLN
Revision: 14 Discipline : HSE		Rev. Date : 07-11-2023

7.3 Communication and Awareness

An effective and open communication/reporting system is established and maintained in order to ensure the correct implementation and constant improvement of the HSE Management System.

7.3.1. Safety Signs

All safety signs of an internationally recognised pictorial standard are posted in the appropriate areas.

7.3.2 Notice Boards

Notice boards show as a minimum:

- Facility layouts with escape routes, muster locations, locations of firefighting equipment.
- Emergency response names and phone numbers.
- List of first aid officers with their location on site.

7.3.3 Awards

An HSE award system is implemented to motivate the workforce to work safely and in an environmentally friendly manner, to raise HSE awareness and promote pro-active attitudes towards HSE Awards will be presented to those meeting/exceeding their HSE related objectives.

7.4 Meetings

7.4.1 HSE Executive Committee

This Committee comprises of the following:

- ❖ Any one of the Executive Management Team.
- ISO Manager
- Quality Assurance/Quality Control Manager
- HSE Officer
- Human Resources/Administrative Manager
- ❖ Any other person(s) invited.

The HSE Executive Committee reviews the efficiency of the Health Safety and Environmental management system of the year and meets at least once in a year and/or when there is an emergency. The meeting is held taking into consideration the following agenda;

- Review of minutes of last meeting
- Review HSE plan, Manual and Policies.
- Review and Improves the enforcement of the HSE plan.
- Review HSE trainings and performance of HSE Manager.
- Deliberate on all HSE investigations reports
- Review HSE Suggestions.
- Review all Legal/Statutory matters of HSE Plan.
- Appointment of new HSE Representatives.
- Discussion on any other matters.

7.4.2 HSE Monthly Meeting

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

The HSE Officer carries out his/her responsibilities through appointed HSE Reps. Every end of the month, he/she convenes the HSE Monthly Meeting with the HSE Reps and a staff member representative with the Quality Assurance/Quality Control Manager or his nominated deputy in attendance. This meeting can coincide with the weekly HSE Reps meeting. During the meeting the following are discussed:

- Highlights of HSE activities within the month.
- Discussion on accidents/injuries/near misses.
- New HSE rules & regulations (if any).
- Training program schedule (actual vs. planned)
- Performance of HSE Reps.
- Extraordinary training requirements.
- Matters arising from the HSE Executive Committee.
- Any other matters.

7.4.3 Weekly HSE Representative Meetings

The Weekly HSE Representatives meeting holds once a week under the chairmanship of the HSE Officer. The Agenda includes the following:

- Minutes of last meeting;
- Verbal report of each HSE Representative on the past week.
- Review walkthrough report
- Discussion on Accidents/injury, near misses
- Status of HSE trainings (where necessary).
- Announcement on changes of HSE Policy (if any).
- Any other business.

7.4.4 Tool Box Meetings

Tool box meetings are held with the objective to promote the awareness of safety issues, refresh workers knowledge and exchange of information relating to a specific task to be carried out. The heads of department/Supervisors/HSE reps hold tool box meetings with the staff for maximum of 10 minutes whenever a special task is to be carried out. He/She ensures the staff carry out the task in a safe way. The agenda includes the following:

- Topic Discussed
- Attendance of staff present
- PPE inspection.

7.4.5 Pep Talk Meetings

Pep Talks are held on a daily basis with the objective to ensure General HSE awareness and teamwork at the work place. HSE Representatives hold a "Pep Talk" meeting with staff of their respective sections at 8.00 a.m. and last for a maximum of 10 minutes.

7.5 Documentation

The Company has an established system to control all documents and HSE relevant data based on ISO9001:2015 Management System Manual. This allows for easy tracking and correct document availability.

Health, Safety and Environment (HSE) Plan		Document Number:
WETEC WA		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

7.6 Safety Risk Evaluation and Management

7.6.1. Overview

Safety risk management for the workplace focuses on risk assessment as best adapted to identify, analyse and evaluate the risks as depicted in the MWAHSE006-P (HSE Risk Assessment). Wherever possible, management controls will be used to eliminate risks at source but failing this; risks will be reduced and/or mitigated to acceptable levels that are considered to be as low as reasonably practicable.

7.6.1 Personnel Involvement (Job Safety Analysis, etc)

Workplace activities are covered by qualitative risk assessment i.e Job Safety Analysis (JSA) for routine while non routine / special activities are covered by a permit to work.

The permit to work system is outsourced by Nigerian Foundries Limited-NFL. Other techniques may also be used (Last minutes risk assessment, Learn to Listen, etc) where these are considered to provide further safety incentive or improvement to safe working practices.

7.7 Respect for the Environment

7.7.1 General

All activities shall be carried out in accordance with HSE Plan. Environmental protection objectives shall be set and the means of compliance identified, to ensure that the Company meets the objectives, legislation and good practice.

The overall goal of the company's environmental plan is to progressively reduce the impact of the company's activity on the environment with the ultimate aim of recovering, reusing and/or recycling of wastes generated from the operation. The wastes generated shall be segregated according to the waste types: process and domestic wastes. The process wastes which can no longer be utilized by the production process, shall be disposed while the domestic shall be disposed of by an approved/accredited waste contractor.

7.7.2 Fumigation

Fumigation of the environment to mitigate rodent and reptiles infestation is carried out once every Six (6) months or in emergency situation. The HSE Officer liaises with the Administrative Manager on the date and time fumigation is to be carried out.

7.8 Safeguarding of Health

7.8.1. Personal Protective Equipment (PPE)

A list of PPE requirements is placed on the notice boards. Enforcement of PPE procedure is done by the HSE Officer and the HSE Reps.

The procedure is enforced by a color card system as depicted in the HSE Violation Chart.

- 3 yellow cards = 1 blue card
- 2 blue cards = 1 red card

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

The blue card results to suspension from work, while the Red card is a referral to the Executive Committee for more severe disciplinary action which can include dismissal from work.

7.8.2. Medical Facilities.

The Company maintains close by medical facilities that meet or exceed local reference standards.

7.8.3. Medical Fitness.

All Personnel that are to be newly employed must show certificate of fitness from Metec accredited hospital or Government Hospitals. Every year, about 20 Percent from the total number of existing Employees are selected to undergo Medical fitness test (Medical Fitness Test-MWAHSE118-F).

7.8.4. First Aid

The company maintains First Aid trained representatives at ratio 1 to 30 employees. Their responsibility is to carry out any first aid procedure. (MWAHSE009-W). For severe cases, while the First Aid treatment is administered the medical facility is notified and transportation is provided.

7.8.5. Drug & Alcohol Abuse

Use of alcohol and drugs is forbidden.

7.8.6. Smoking

The Security area is the designated smoking area where smoking of Cigarette is allowed.

7.8.7. Malaria Control Program

The Company has a malaria control plan in place. It is the responsibility of the Company to ensure compliance to this Plan.

The malaria control awareness and education exercise will cover such areas as:

- Awareness or understanding of the risk
- Mosquito bite prevention
- Chemoprophylaxis and testing requirements
- Ability to recognise the major symptoms and seek early diagnosis and treatment.

7.8.8. Covid-19 Control Protocol

The Company has a Covid 19 Control protocol in place. When required, all Staff, Contractors and visitors are to undergo non medical COVID 19 protocols on gaining entry into the premises. (See MWAHSE00-P).

7.8.9. Material Safety Data Sheet (MSDS)

All MSDS used for production are recorded into a Safety Data Sheet Register and made available to First Aiders for reference in the case of an emergency. MSDS sheets are pasted on the HSE Notice board in the Foundry. It is the responsibility of the HSE department to collate and keep

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

MSDS sheets up to date and conduct a Control of Substances Hazardous to Health (COSHH) assessment for each material used.

7.9 Competence and Training of Personnel

Training is one of the most important ways of enforcing HSE in the Company. All internal/external trainings are conducted at the training school or where applicable either through presentations and handouts or conducted practically on site. All HSE trainings are conducted in association with the Human Resource Department who is the custodian of the latest training plan and presentations.

The competence is defined in terms of the adequate skill, training and/or experience.

It is the responsibility of the HSE Officer in conjunction with the HR Manager "to train the trainer". It is then an employee is certified capable to train.

All new employees pass through an HSE induction training that also gets recorded.

On the job training is carried out by experienced supervisors until the worker is familiar with his job.

7.9.1. Annual Training Plan

This plan is prepared yearly and is divided into three categories:

- General HSE knowledge. i.e. PPE enforcement.
- Procedural training. i.e. How to carry out investigations.
- Specific training, i.e. firefighting, training for welders etc.

7.9.2. Extraordinary Training Requests

These are requests made during the Monthly HSE meeting by the HSE Reps who have observed a particular area where training is needed to be re-emphasized.

7.9.3. Induction Training for new employees.

All new employees undergo an induction training which includes:

- General Company matters
- HSF
- Basic Management courses.

7.9.4. Safety Induction for external visitors/contractors

A small HSE presentation is done to all external visitors/contractors who are visiting/working in the factory premises. The training is recorded in a log book.

7.9.5. Safety Induction for visitors/Clients

A small HSE presentation is done to all visitors/clients who are visiting/ inspecting in the factory premises. The training is recorded in a log book.

7.9.6. Contractor/Sub-contractors

The provisions of the HSE Plan apply to all Sub-contractor performing jobs on company premises. A minimum training in form of a HSE induction is done for all Sub-contractors and their personnel. At the end of the induction the Sub-contractor and each of his personnel sign the safety log book. Any of the Sub contractors and his/her employees who fail to follows HSE regulations shall be evicted from the factory and may have his/her contract terminated.

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 071609		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

7.10 Emergency Responses

7.10.1. Emergency System

During the induction safety training all personnel familiarize themselves with emergency exits, assembly points (muster points), emergency equipment and exit ways as stated in the Emergency/Fire Plan (See MWAHSE002-PL). It is the responsibility of each employee to respond during such an alarm. Failure to do so results in disciplinary action.

7.10.2. Drills

Drills are conducted on a regular basis (twice in a year) and are considered an essential part of the overall safety program to ensure that everyone fully understands their role in case of an emergency.

7.11 Incident Analysis

7.11.1. Incident Investigation

The Company operates a "No Blame" HSE culture and all personnel must report all incidents/accidents and near misses, however minor they are. All reported incidents get investigated as per company procedure. (MWAHSE002-P) The identification of causes of incidents/accidents and implementation of corrective actions enables the Company HSE performance to be improved.

7.11.2. Analysis and Corrective Actions

Analysis of the immediate and root causes of an accident and incident is done immediately after an accident or anomaly has occurred. Corrective actions implemented get evaluated and recommendations made. Specific accident cases are used as Peptalk topics.

7.11.3. Monthly & Weekly Reporting

The HSE weekly representative meeting minutes are submitted electronically to the Managing Director. While the monthly Management report include statistical data for HSE performance over the period under review.

7.11 Audits and Inspections

Metec WA provides all assistance for external audit inspections by Vendors and other agencies. The Company keeps an open door policy as its aim is always to improve.

7.11.1 HSE Walkthroughs

HSE Walkthroughs are conducted regularly and is a leading indicator for HSE performance.

Each walkthrough is recorded in a report format followed by observations and action nominees who are to effect the changes. The report gets reviewed during the Weekly HSE meetings.

7.11.2 Planned Maintenance and Inspection.

Assets are operated, maintained and inspected according to laid down procedures.

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 071609		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

7.11.3 Anomaly (Unsafe act/situation) reporting system.

HSE Reps are issued forms to document any anomalies. Both Anomalies/ HSE Suggestion forms are available at the HSE Suggestion boxes to be filled out by and put in the box.

7.12. Records / Corrective Actions

HSE actions implemented are registered in the Corrective action register (MWAHSE043-F) which is maintained by the HSE Officer.

7.13. Performance Improvement

The HSE Plan is reviewed once a year or whenever found necessary by the HSE Executive Committee to ensure effectiveness, improvement and updating of the whole system.

Based upon these reviews, an HSE Improvement Plan is established and the documentation gets updated in line with the findings.

8. APPENDICES

Appendix 1: HSE Organizational Chart

Appendix 2: Audit Program

9. ADDENDUMS

Work Instructions

- Induction Training For New Employees (MWA 323-W)
- Emergency Evacuation Drill(MWAHSE001-W)
- Tool Box Meeting (MWAHSE002-W)
- Weekly HSE Representative Meeting (MWA HSE003-W)
- HSE Executive Meeting (MWAHSE004-W)
- HSE Monthly Meeting (MWAHSE005-W)
- HSE Briefing For Visitors/client (MWAHSE007-W)
- First Aid Treatment (MWAHSE009-W)
- Enforcement of HSE Card System (MWAHSE008-W)
- Personnel Alcohol Level Test (MWAHSE027-W)
- Pep Talk (MWAHSE031-W)

Forms

- HSE Executive Committee Meeting (MWAHSE001-F)
- Accident / Incident Report Form (MWAHSE006-F)
- Weekly HSE Representative (MWAHSE013-F)
- Monthly HSE Representative (MWAHSE014-F)
- Tool Box Meeting (MWAHSE016-F)
- Investigation Form (MWAHSE019-F)

Health, Safety and Environment (HSE) Plan		Document Number:
METEC WA NIGERIA RC 071609		MWAHSE001- PLN
Revision: 14	Discipline : HSE	Rev. Date : 07-11-2023

- Witness Reporting Form (MWAHSE020-F)
- Anomalies /Nearmiss Reporting Form (MWAHSE021-F)
- HSE Training Plan (MWAHSE057-F)
- Job Safety Analysis(JSA) (MWAHSE041-F)
- Corrective Action Register (MWAHSE043-F)
- Alcohol Content Test Report (MWAHSE109-F)
- Training Attendance Register(MWA127-F)
- Pep Talk (MWAHSE112-F)
- Medical Fitness Test-MWAHSE117-F

Document

- PPE Application List (MWAHSE001-D)
- Violations Charts (MWAHSE004-D)
- Emergency Evacuation Plan (MWAHSE006-D)
- Emergency Hospital Contact (MWAHSE008-D)
- HSE Policy Statement (MWAHSE12-D)
- Smoke Free Policy Statement (MWAHSE017-D)
- Drug And Alcohol Policy Statement (MWAHSE019-D)
- Community Relation Policy Statement (MWAHSE020-D)
- Government Regulatory Requirement on HSE (MWAHSE021-D)
- HSE Accident Record (NFLHSE005-D)

Procedure

- Health, Safety & Environment: (MWA 016-P)
- HSE Risk Assessment: (MWAHSE006-P)
- Human Resources and Development (MWA 017-P, Section 4.4)
- Accident/Incident Investigation Procedure (MWAHSE002-P)
- Covid-19 Control Procedure (MWAHSE008-P)

Plan

• Emergency & Fire Plan: (MWAHSE002-PLN)