



## CONTRACTOR EH&S REQUIREMENTS

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## **Introduction**

**Emirates Steel (Part of EMSTEEL Group)** believes that all injuries; occupational illnesses; and environmental incidents are preventable. Emirates Steel is committed to relentlessly pursuing a goal of zero harm, both for their own staff, and the staff of the Contractor/Sub-Contractor companies with which they engage. Where reference is made within this document to Contractors, this reference shall be read and construed as extending to all sub-contractors.

Emirates Steel has implemented a set of EH&S Principles and Life Saving Rules which are applicable to all personnel wishing to enter ES premises; compliance is mandatory (all ES personnel along with Contractors and their subcontractors). All Contractor employees assigned to work on activities at Emirates Steel will be familiarized via this document but also, prior to mobilization from Emirates Steel at the H&S Induction Training. Violation of a Life Saving Rule will subject the violator to serious disciplinary action.

Emirates Steel expects all their Contractors **and their sub contractors** to comply, at the very least, with the H&S requirements detailed in this document during the course of their work.

The scope of this document applies to Contractors providing a physical service (or combined material & service) to Emirates Steel operations, projects and facilities management under a fixed contract agreement. These services include, but are not restricted to, plant and facilities maintenance, modification and installation activity, capital projects related activity, manpower & equipment's supply, etc.

These requirements include, and/or make reference to all Emirates Steel H&S Rules, Procedures, Standards and Safe Work Practices to be applied when undertaking activities within our premises. They shall be read in conjunction with the UAE applicable laws and regulations as well as the contractual obligations of the Contract and may be changed to suit a particular task or the needs of any Emirates Steel department.

For any clarification or additional information please contact the Emirates Steel EHS Department.

## **REQUIREMENTS**

### **1. Site Supervision Resources (when not working under ES direct supervision)**

***Under no circumstance shall Contractor employees be permitted to work without adequate supervision. Contractors shall designate and identify qualified and experienced Supervisors/Foremen capable of communication in English, min 5 years of site experience, holding bachelor's degree or 3-year regular diploma in engineering discipline, competent in providing leadership in H&S management of their teams, as well as in the technical Scope of Work.***

Additive to Section 2 below, prior to any Contractor employee entering site, Emirates Steel shall provide general H&S Induction Training and comprehension test in a limited number of languages; however, it is the Contractor's responsibility to ensure that all their employees (who may exhibit a range of language and literacy capabilities) fully absorb, understand and act upon any H&S training, information, instructions, and conversations related to contract execution throughout the duration of the engagement (by utilising, for instance, multi-lingual supervision and visual demonstration techniques).



### **6.1 The Contractor supervisor / foreman main Health and Safety responsibilities (Ref. ADOSH):**

- Ensure that all hazard and risks are identified and controlled to an acceptable level prior to start any task.
- Participate and prepare the risk assessment.
- Provide H & S information and training to their staff.
- Ensure the on-site team have the required tools and PPE to safely complete the assigned task.
- Perform daily safety activities including, but not necessarily limited to toolbox talks with the workers, receipt of permit to work and compliance with Emirates Steel site safety rules
- Report hazards, near misses, accidents and any other EH&S non-conformity noticed on site.
- Prepare accident investigation for Emirates Steel and update Emirates Steel HSD on their staff medical status when required. Investigations should be completed with the defined time frame.
- Be familiar with the site emergency procedure and take ownership for the staff during any emergency.

## **2. H&S File**

***Pre-mobilisation, or on reasonable request, the Contractor shall provide Emirates Steel with an H&S file which shall be maintained by the Contractor. The Contractor shall ensure that the File is continuously updated with the latest versions of the documents contained therein. The File shall include (non-exhaustive list):***

- H&S Plan for the project or set of contracted activities
- **ADOSH** Medical **Fitness** certificates of fitness **to work**, and copies of I.D's, for the work team
- Insurance Liability
- Training Records and Matrix
- Competency certificates
- Records of appointment of responsible people e.g. Supervisors
- Organogram with Emergency Contact numbers
- JSAs and JMSs
- MSDS
- Tool & Equipment check list, **PPE, Housekeeping Checklist etc.**
- Certificates of condition/testing (e.g. lifting equipment/ tools etc.).
- Electrical powered tools list (list reviewed and approved by Emirates Steel)
- **Safety** Harness; **rescue equipments/kits** lifting tools; tackles; general lifting equipment; SCBA hydrotest, and rigger, operator, scaffolder and scaffolding inspector third party **certificates (The third-party certification must be from a service provider that is approved by Emirates National Accrediation System (ENAS) and the Abudhabi Centre for Technical and Vocational Education and Training (ACTVET), Abudhabi)**
- Incident Investigation procedure and records
- Waste disposal plan
- **Site Safety Inspection reports**
- H&S records / statistics.

## **3. Induction**

Contractors shall receive Emirates Steel H&S induction training prior to entering the working premises (**Refer: HSD-GR-PR-009**). This can be organised through submitting a request to [safetyinduction@emiratessteel.com](mailto:safetyinduction@emiratessteel.com). **Induction request shall be submitted before 48hours.** At



the end of the induction training, a short test of comprehension will be given. Emirates Steel reserves the right to refuse entry to any Emirates Steel work site for any Contractor personnel that have either not satisfactorily completed the H&S induction training as described above or have failed the training comprehension test.

**4. H&S Manpower Resources**

The appointment of H&S Managers / Supervisors / Officers does not relinquish the responsibilities towards health and safety of Contractors top management, supervisors and employees under the **Abu Dhabi Occupational Safety & Health System Framework, (ADOSH-SF)**. The appointment is part of the strategy to assist all parties in complying with their duty of care. The responsibilities of the H&S Managers / Supervisors / Officers include, but are not necessarily limited to:

- Leadership of the development, implementation and maintenance of an appropriate H&S Management System with the entity.
- Provision of specialist advice and support to senior management regarding how to control the workplace hazards and risks.
- Ensuring the H&S performance monitoring system to be in place to ensure the effectiveness of injury prevention and risk management procedures.
- Ensuring two-way communication between HSD, the management and the workforce.
- Ensuring that H&S programs are in compliance with the Emirates Steel requirements.
- Advising the Contractor senior management regarding legal H & S requirement for compliance.
- Ensure that applicable H&S programs are in compliance with the regulatory requirements.
- Advise the senior management regarding legal H & S requirement for compliance.
- Carryout regular inspection and audits to ensure compliance of established procedures and risk assessments.

Evaluate the H&S performance of any selected sub-contractor for the selection process and assessment criteria. The Contractor shall allocate adequate and qualified H&S manpower resources (**Ref. ADOSH-SF**) to meet the following minimum requirements:

Before deploying any Contractor EH&S representative in any projects/job within Emirates Steel, the Contractor must obtain formal approval from the Emirates Steel EHS department.

Number of Permanent Site Staff	Minimum EH&S Manpower	Minimum Requirements of competency
*10 – 50 staff	1 Safety Officers / Supervisor on Site	<b>Minimum of 5 to 7 years of experience in EH&amp;S field (Steel Manufacturing Industry or Oil &amp; Gas), holding the bachelor’s degree in science or engineering and at least NEBOSH International General Certificate. They shall be trained / experienced in Root cause analysis, chemical handling, basic firefighting, and confined space entry, risk assessment, Audits, working at height and basic road safety. They should be able to communicate in spoken and written English, and able to prepare the investigation reports, risk assessment, conducting safety inductions, safety meetings with the clients and with the employees performing day to day Toolbox talks.</b>



<p>Above 50 Staff</p>	<p>1 Safety Manager Permanently Based on Site</p> <p>1 First Aid responder</p>	<p><b>Minimum of 10 to 12 years of experience in EH&amp;S field (Steel Manufacturing Industry or Oil &amp; Gas), out of which minimum 5 to 7 years as EH&amp;S Manager, holding the bachelor's degree in science or engineering and at least NEBOSH International Diploma Certificate or any other qualification equivalent to level 6 of the EH&amp;S qualification framework.</b> They shall be trained/experienced in root cause analysis, emergency response, firefighting, and lifting, chemical handling, permit to work system, advanced confined space entry, gas testing and advanced risk assessment. Able to communicate well in spoken and written English as well as being capable of <b>transforming the safety culture</b>, writing detailed reports, including accident investigation reports, safety procedures, <b>Audits</b>, minutes of meeting, circulars and official communications to the client. Previous experience in the Gulf Region is a plus.</p> <p>Contractors shall include a first aid responder in their team, if the number of their employees (including sub-contractors) is equal to, or exceeds, 50 staff on site.</p>
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**\*NOTE: IN THE FOLLOWING HIGH-RISK WORK CATEGORIES, THE CONTRACTOR MUST PROVIDE A DEDICATED SAFETY OFFICER EVEN IF THE STAFF/WORKING CREW IS BELOW 10.**

- Work in an area where there is a potential for exposure to energized equipment, hazardous substances (gasses, fluids and/or solids), that could cause injury/illness.
- All entry to confined space or works in identified confined spaces.
- All work with potential source of sparks or naked flames, i.e., hot works.
- All work with radiation sources/material or works without using radiation source but carried out near a radiation source location.
- All lifting activities involving mobile cranes and man lifts.
- All work that constitutes working at heights where protection from falling from heights is required.
- The unavoidable disconnection, removal or overriding of a safety device e.g., limit switch or interlock.
- All work that requires isolation and lockout of equipment.
- Routine activities involving hazardous materials when working.
- Any other activity identified as high risk after completing a JSA/risk assessment.
- Working on live equipment without isolation/immobilization (during testing, commissioning, and condition monitoring).
- Work carried out involving excavation activities.
- Work carried out near live cables or in man-holes.

**5. Reporting and Investigation**

Contractor employees shall immediately report any incidents, accidents, injuries, near miss, any hazard observed and damage to property to the Emirates Steel Process Owner / Area Supervisor / Contract Focal Point. Contractors should actively encourage all their employees to report Near Miss, Hazard Observations, without fear of consequence.

The Contractor shall participate in incident investigations conducted by Emirates Steel when required.

**Refer following ES procedure for reporting incidents and investigations.**

- **HSD-GR-PR-026 Incident Investigation and Reporting Procedure**

**6. Employee Welfare**

Contractor personnel must be able to perform their job duties in a safe, secure, productive and effective manner and remain able to do so through the entire time they are working. The Contractor shall have a fitness for duty policy and **ADOSH** medical **fitness** certificate, (**HAAD License approved doctor, Abudhabi**) which ensures their personnel do not perform work under circumstances of 'diminished





capacity' – i.e. they must be physically and emotionally capable of performing the work to which they are assigned. In addition to reporting all work-related injuries, the Contractor must ensure that its employees report non-work-related injuries or conditions to their supervision to the extent that they risk aggravating a pre-existing condition or affect ability to safely perform the work. Additionally, the Contractor should have a "restricted work" policy to minimize risk of injury aggravation.

For reference, diminished capacity exists when a worker's ability to safely perform their duties are compromised due to (but not limited to):

- **Fatigue Management**
- **Working hours** exceeding local employment standards
- **Off-the-job** accommodation and recreational standards fall below local regulatory and inspectorate requirements
- **Substance abuse** (includes over-the-counter drugs, misuse of prescription drugs and illegal drug use and alcohol consumption)
- **Supervision** lacks training to recognize symptoms and behaviors common to abuse and take action to address substance abuse through the employer.
- **Medical** – pre-existing conditions, prescription drug use or allergies creating negative effect on a worker's ability to work safely
- **Physical limitation** - interaction with the environment conditions like heat, climbing, lifting, pre-existing injuries
- **Psychological** – work related and non-work-related mental distractions or stresses like family matters, difficult life experiences, co-worker problems, phobias

Contractors shall ensure that, during hot weather, their employees shall be limited to heat exposure by management of their schedule, nature of work, rest regimes, provision of shades / cool areas, hydration, etc.

Contractors personnel shall be provided with the required welfare facilities. Depending on the contractual agreement Emirates Steel or the Contractor shall look after such provision.

All temporary buildings of Contractors within Emirates Steel worksites shall be located in an area approved by Emirates Steel User Department. ***These temporary caravans or cabins need to meet Abu Dhabi Civil defence requirement standards for the working people occupation and shall be approved by the ES EHS Department.***

## **7. Emergency Preparedness**

The Contractor shall abide by the Emirates Steel Emergency Procedure which is highlighted as part of the induction.

Emirates Steel fire and emergency response equipment and systems shall not be impaired or used for non-emergency activity without authorisation from Health and Safety department.

All Contractors shall ensure that they have knowledge of the name and location of their workers and of the emergency assembly points so that they can be accounted for during any arising emergency situations.

## **8. Control of Work**

Contractors shall ensure they eliminate or control workplace hazards as far as possible and take satisfactory measures to reduce risk to an acceptable level where the risk of injury or damage is unlikely. In the scenario where a Contractor is unclear on how to mitigate risk, they should seek support from the Emirates Steel End User, ***FCA*** or ***EHS Departments.***



### **8.1 Scope of Work**

Emirates Steel shall provide the Contractor with a Scope of Work at Invitation to Bid stage, which shall include full and clear declaration of:

- Description and specifications of the work/activity required of the Contractor
- Safety performance expectations and behaviors required of the Contractors to be engaged.
- Specific risks, hazards, and risk mitigation requirements (Safety Plans, Job Safety Analyses (JSAs), Job Method Statements (JMSs), etc. to be submitted by the Contractor) associated with execution of the required service
- Specific competencies, experience and skills (as appropriate) required from the Contractor personnel to be engaged

### **8.2 H&S Plans**

Based on the above Scope of Work, and a subsequent visit to the proposed Emirates Steel worksite, Contractors shall include an H&S Plan for execution of the required work in their bid submission. Emirates Steel will review the H&S Plan integral with their Bid Evaluation and Contractor Selection processes. ***The project specific EH&S plan shall be submitted by the contractor after awarding the contract for ES approvals.***

### **8.3 Permits to Work (PTW)**

All routine and non-routine work/activity to be carried out by all Contractors engaged by Emirates Steel shall be subject to the control processes detailed in the Emirates Steel Permit to Work Procedure (HSD-GR-PR-003). It is very important for the Contractor to take into consideration that the overall Permit to Work Procedure provides for the following risk-specific types of Permits:

- Cold Work Permit (HSD-GR-FM-001)
- Confined Space Entry Work Permit (HSD-GR-FM-002)
- Hot Work Permit (HSD-GR-FM-003)
- Excavation Work Permit (HSD-GR-FM-053)
- Permit to Work on Live or Energized Equipment (HSD-GR-FM-093)

Contractors shall fully familiarize themselves appropriately with all these procedures, together with their related requirements, including the associated Contractor-related accountabilities and responsibilities.

***Refer following ES procedure for permit to work system compliance.***

- ***HSD-GR-PR-003 Permit to work Procedure***

## **9. Personal Protective Equipment**

Contractors shall use PPE as a last line of defence where workplace hazards cannot be eliminated or reduced to an acceptable level. Contractor personnel working at Emirates Steel worksites shall comply with all applicable PPE requirements for the task they are performing or the area in which they will work. ***The minimum required PPE within Emirates Steel is Safety Helmet, Coverall, High ankle safety boots, ear plugs and Safety Glasses. Contractor personnel needing to wear spectacles for their work will be required to wear prescription safety glasses whenever they work at Emirates Steel. The Contractor management must ensure that Contractor personnel are provided with prescription safety glasses to access the Emirates Steel plant or work areas. In addition to this, contractor employees must carry personal gas detectors while working in the DRP plants and any other areas specified in the JSA.***

Other PPE may be required, dependent on the task being performed. Loose clothing & Jewellery shall not be worn, and long hair shall be tied back when work is performed around machinery with exposed moving parts. Loose clothing worn around the neck area is forbidden.

Contractors or visitors must follow below mandatory dress code:

***PPE Policy for all Contractors (Mandatory):***



- **Safety Helmet**
- **Coverall / Industrial company uniforms**
- **High ankle safety shoes**
- **Safety Glasses**
- **Ear plugs (for high noise area)**

Contractor provision of PPE should be relevant to the task they are assigned, offering protection against the hazards present. All PPE worn by contractors and subcontractor’s personnel shall be subject to inspection by Emirates Steel end user and EHS departments and must meet the requirements of Emirates Steel PPE procedures.

**Note: The Contractor must ensure that the appointed (approved by ES) safety officer is provided with a visible red helmet.**

Contractor’s personnel not adhering to the PPE rules shall be removed from site and not allowed re-entry until the next day, pending confirmation of future compliance.

**10. Emirates Steel EH&S Principles & Life Saving Rules**

*Principles are the Fundamental norms, rules, or values that represent what is expected by the organization (Emirates Steel) and its employees and help it determine the rightfulness or wrongfulness of its actions. It outlines the organization's health, safety, and environmental philosophy. Emirates Steel EH&S Principles are shown in the figure below;*



Emirates Steel has implemented a set of Life Saving Rules, which shall be complied with by all personnel (including Contractors). All Contractor and Sub-Contractor employees assigned to work on activities at Emirates Steel must receive familiarization training on these rules prior to mobilization, firstly from their own company management, and secondly, Emirates Steel shall include an awareness summary of their Life-Saving Rules in the H&S Induction training which they will provide immediately before Contractor and Sub-Contractor employees coming on site. Emirates Steel expect strict compliance. Violating a Life-Saving Rule will subject the violator to serious disciplinary actions.





## Life Saving Rules

### 1

#### Working at Height

Protect yourself from falling from height



- ▶ **Never work at height without authorization**
- ▶ **Never work at height unless you have been trained** on your fall protection equipment and on working at height
- ▶ **Always inspect your fall protection equipment** before and after use
- ▶ **Always secure all tools, equipment, and work materials** to prevent dropped objects
- ▶ **Always tie-off** to fixed and secure anchor points

### 2

#### Confined Space

Protect yourself from hazardous atmospheres & avoid becoming trapped in confined spaces



- ▶ **Never enter a confined space** unless you have been **trained** on confined space entry
- ▶ **Never enter a confined space** unless you have **obtained formal authorization (PtW)**
- ▶ **Never enter a confined space** unless you have confirmed that the **atmosphere has been tested and is being monitored**
- ▶ **Never enter a confined space** unless you have confirmed that all **energy sources are isolated**
- ▶ **Never enter a confined space** unless you have confirmed that a **rescue plan** is in place
- ▶ **Always stop work if gas is detected or if conditions change**, go to a safe place, and inform your supervisor

### 3

#### Lock Out Tag Out

Protect yourself from hazardous energy



- ▶ **Identify all energy sources** associated with your operation
- ▶ **Confirm that all energy sources have been isolated, locked, and tagged out** before starting work
- ▶ **Confirm that any stored energy** has been **released** before starting work
- ▶ **Stop work and notify your supervisor if conditions change** or the isolation has been compromised

### 4

#### Permit to Work

Protect yourself from the risks associated with unauthorized activities



- ▶ **Never work without authorization**
- ▶ **Always comply with the requirements of the permit-to-work** process
- ▶ **Always confirm that the hazards are controlled** as outlined in the PtW and associated JSA before starting work
- ▶ **Stop work and notify your supervisor if the job scope or the risks change** or if the permit controls are affected



## Life Saving Rules

### 5

#### Traffic & Driving

Protect against traffic accidents



- Always **make sure you are aware of** and **adhere to local and site-specific traffic rules**
- Always **wear a seatbelt** when you are in a moving vehicle or mobile equipment
- Never use handheld mobile phones, operate devices,** or engage in any form of distraction while driving or operating mobile equipment
- Never exceed the speed limit** and reduce your speed to account for road and weather conditions
- Never drive under the influence of alcohol, drugs, medications,** or any other substance that could impair your ability

#### Safety Devices and Safety Systems

Never compromise safety devices or safety systems

- Never remove, bypass, override, disable, or tamper with safety devices or systems without authorization**
- If you suspect a **safety device or a safety system has been compromised** without proper authorization, **stop work immediately** and notify your supervisor



### 7

#### Dropped Objects and Mechanical Lifting

Protect against falling objects



- Always **secure objects** properly when you place them at a height
- Never stand or walk under a load** that is suspended, being lifted, or moved
- Never operate lifting equipment** unless you are **trained and authorized** to do so
- Always ensure that the **load is secure, balanced,** and **within the rated capacity** of the equipment and accessories
- Never attempt to stop or guide a suspended load manually;** always use a **tag-line** or a **controlling device**
- Always ensure **lifting zones are barricaded** and adhere to barriers and exclusion zones

#### Smoking in Non-Designated Areas

Protect against fire by only smoking in designated areas

- Never smoke in non-designated areas.**
- Only **extinguish and dispose** of cigarette butts in the **designated fire-safe containers**



### 9

#### Energized or Moving Equipment

Protect yourself from the hazards associated with energized or moving equipment



- Never work on energized or moving equipment** if it is practically feasible to stop, isolate, and de-energize
- Never attempt to inspect, test, maintain, or repair any energized or moving equipment** without authorization
- Always ensure that the **risks are identified** and that the appropriate **controls are implemented**
- Never wear loose clothing, jewelry,** or other items that could become **entangled**





**11. Plant and Equipment**

All plant and equipment brought to the site shall be in good condition and safe to use. Contractors shall develop and maintain necessary checklists, highlighting the vital points for equipment inspection and the frequency of that inspection (daily/weekly/monthly).

Damaged tools and equipment shall be immediately removed from the worksite and be repaired or replaced. Tools shall be used only for the purpose for which they were designated. No home-made or altered tools shall be used; tools at all times should be fit for purpose. **All plant and equipment must be properly maintained through regular preventive maintenance. The contractor is responsible for having a preventive maintenance (PM) plan in place for all equipment in line with the OEM requirements. The contractor must also ensure that PM plans and records are kept up-to-date and available for ES verification.**

Contractor employees driving vehicles shall be required to have a valid UAE Driving License for the class of vehicle being driven; each vehicle shall have a valid registration. **Contractors must ensure that all drivers have completed defensive driving training and possess the required experience as outlined in the table below.**

<i>Driver's Type</i>	<i>Requirements</i>
<i>Contractor Light Vehicle Drivers</i>	<i>Valid Driving License with minimum 6 Months' experience.</i>
<i>Heavy vehicles, trucks &amp; Buses</i>	<i>Valid Driving License with minimum 2 years' experience (Specific to Trucks).</i>

All vehicles brought by the Contractor shall conform to UAE Traffic law regarding roadworthiness, licensing, insurance, spares, and safety equipment.

- Mobile Lifting Equipment (such as forklifts, cranes, man-lift, shovel, etc) shall only be operated by qualified and certified personnel.
- Forklift Trucks have to be equipped with a safety warning system ( beacon light, red arc light, blue beam light and seat belt indicator)
- Contractors driving vehicles shall comply with all posted traffic signs, maintaining speed, signals and directions.
- Vehicles / Equipment shall not block any street, roadway, emergency vehicle, or emergency exit.
- Speed limit for all vehicles is 20 kph.
- Seatbelts must be worn at all times.
- No person is permitted to ride on or in any vehicle unless there is a specific seat for him.
- The use of a mobile phone while driving or operating equipment is prohibited.
- **Vehicle escorts should be provided by the contractor supervisor for all mobile equipment operations ( Cranes, MEWP, Loaders etc.)**

**All Company or Professional/Commercial Vehicles/equipment must comply with all legal requirements. Beyond that, ES requires that vehicles/equipment entering inside the ES should be equipped with the following:**

<i>Requirements</i>	<i>All Vehicles</i>	<i>Trucks/Trailers</i>	<i>Mobile Equipment</i>
<i>Seat belts</i>	<i>All occupants</i>	<i>All occupants</i>	<i>Operator and as per manufacture safety instructions.</i>
<i>Air bags</i>	<i>2 Airbags Front</i>	<i>2 Airbags Front</i>	<i>N/A</i>
<i>Anti-lock braking system</i>	<i>Yes</i>	<i>Yes</i>	<i>N/A</i>
<i>Rear-window defogger</i>	<i>Yes</i>	<i>As per the type</i>	<i>Yes (If applicable as per the type)</i>
<i>Reverse Alarm</i>	<i>Yes</i>	<i>Yes</i>	<i>Yes</i>
<i>Reverse Camera</i>	<i>Yes</i>	<i>Yes</i>	<i>Yes</i>
<i>Flashing Amber Light</i>	<i>Applicable for all Emergency vehicles</i>	<i>Yes</i>	<i>Yes</i>
<i>Fire Extinguisher</i>	<i>Yes</i>	<i>Yes</i>	<i>Yes</i>
<i>Arc Light- to keep pedestrians away</i>	<i>N/A</i>	<i>N/A</i>	<i>Yes (For Forklift &amp; Loaders)</i>

## 12. Portable Power Tools

Contractors shall ensure that portable electrical tools and measuring instruments have valid calibration certificates and are maintained in good condition. All electrical tools shall be physically inspected for condition and integrity prior to use at the worksite. Electrical tools shall be periodically checked, and records of these inspections shall be maintained. ***Do not connect portable power tools in the ES sockets until approval from the ES electrical department to ensure capacity of the power socket in line with the requirement of power tools.***



***The Contractor shall retain the services of a competent, qualified electrician to inspect and tag electrical power hand tools, transformers, distribution boards, extension cables, etc.***



***All electrical leads must be connected to the power source through standard industrial waterproofed plugs and sockets (Industrial Type), which shall be in good condition.***



***If any defects are identified, the tool shall be removed from service and tagged (not to be used).***



***When using portable electrical tools on small workpieces inside a workshop, the workpieces shall be suitably secured to the workbench using a vice or clamps, and the working surface should be clean and dry.***

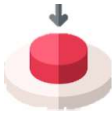
# حديد الإمارات EMIRATES STEEL



**Use the right tool for the job: Double-insulated tools shall be used. Power tools and associated implements shall be used only for the specific purpose they were designed. (Do not improvise with the wrong tools or handmade power tools).**



**Portable electrical tools shall only be operated by personnel with the necessary knowledge, experience and skill to operate them safely as per Manufacturer Guidelines, Method Statement, and Risk Assessment.**



**Power tools, such as Grinding machines, have to be fitted with "Deadman switch" trigger (auto cut-off).**



**Tools shall always be transported from one work location to another (when required), in adequate containers so as not to endanger the safety of other personnel available in the area.**



**Wear Appropriate personal protective equipment as defined in the JSA/WI.**

Sharp-edged and sharp-pointed power tools shall not be handled as follows:

- Thrown from person to person.
- Be used in close proximity to others (e.g. a slip of the tool may injure someone not involved in the task).
- Be used in close proximity to moving machinery without proper precautions being considered.
- Not be left lying around where personnel have to pass (especially on elevated work platforms where they might fall on persons below).
- Only insulated or non-conductive tools shall be used on or near live electrical equipment, where there is a risk of electrical shock.

### ***Storage of Power tools***

- Prior to storage, power tools shall be electrically de-energized, switched on the safe mode, and packed safely according to manufacturer instructions.
- Sharp power tools shall be stored with their blades/edges protected or be placed in a safe position to avoid accidental contact or falling onto personnel.
- Power Tools shall be kept clean and free from moisture and chemicals and, where necessary, lightly oiled to prevent damage and corrosion.
- Prior to storing, power tools shall be regularly inspected for defects and, where necessary, repaired or disposed of. Only safe and good condition tools shall be stored for use.

## **13. Working at Height**

***When it is necessary for Contractor/Sub-Contractor employees (or anybody else) to work at the height of 2m or above, fall protection equipment shall be worn. All work of this nature shall be compliant with the Emirates Steel Working at Height Procedure. Where fall protection equipment is worn, the Contractor shall provide sufficient resources for rescue and a rescue plan. Before starting the activity, a work at Height Activity Assessment Checklist HSD-GR- FM-114 must be duly filled and made available at the site along with the permit to work issued for the specific activity.***



**Note:**

- 1) *It is not mandatory to wear a full body harness while working on any platform (portable or temporary working platforms below 2-meter height) provided with standard railing systems such as top rail, mid-rail and toe boards. The requirement of the full-body harness is subjected to the job requirement and the risk assessment. The use of a full-body harness in these conditions shall be determined as part of the risk assessment associated with the specific activity.*
- 2) *It is not mandatory to wear a full body harness while working on any permanent platform at any heights provided with standard railing systems such as top rail, mid-rail and toe boards. The requirement of the full-body harness is subjected to the job requirement and the risk assessment. If the job involves pulling, pushing or it has been identified that the full body harness is needed in order to rescue the employees as part of rescue plan or any other activities which have the potential to cause repulsion force then people required to wear the full-body harness with 100% tie-off. The use of a full-body harness in these conditions shall be determined as part of the risk assessment associated with the specific activity.*

*Work at height third party training is mandatory for all the employees. Where training is provided for safe working at height, the training shall cover as a minimum;*

- *Types of fall protection equipment*
- *Fall hazards associated with the work to be completed*
- *Procedures for the removal of fall protection devices from service for repair or replacement*
- *Fall protection equipment identification methods*
- *Equipment maintenance and inspection requirements*
- *Emergency rescue procedures*
- *Practical and theoretical training on the actions to be taken in an emergency including rescue from height*
- *Suspension trauma*
- *Equipment strengths and weight limitations*

*The Provision of rescue equipment, rescue plan and resources are mandatory. Ensure rescue plan submitted to ES for review and approvals. Contractor to ensure stand by manlift available full time near the job location while working at height using the manlift.*

*Refer following ES procedure for work at height compliance.*

- *HSD-GR-PR-020 Work at Height Safety Procedure*

**Scaffold Erection, Alternation and Dismantling:**

- *Trained and competent scaffolders under the supervision of the scaffolding supervisor/foreman shall only undertake the erection, alternation, and dismantling of the scaffolding.*
- *Scaffolds above 10 meters and special scaffolds (i.e., load bearing, suspended, Free standing scaffolds and cantilever) shall be erected, altered, used and dismantled in accordance with the design drawing. A competent engineer must prepare the design drawing after visiting the site.*
- *The Contractor shall obtain an appropriate work permit as per (HSD-GR-PR-003) before commencing the work (including mobilization & demobilisation of materials as per scaffolding procedure).*
- *The area must be properly barricaded during the erection, alternation, and dismantling of the scaffolding along with the sign boards.*
- *Proper means of lifting devices (third-party certified) must be used for transferring and lowering materials from higher elevations (e.g. Lifting bags, pulleys and ropes)*
- *Appropriate fall protection devices must be used at all times.*



- *Follow ES Scaffolding Safety procedure (HSD-GR-PR-011) all the time.*
- *Wooden planks should not be used in SMPs or plant locations where there is a risk of molten metal splashes or fire hazards. In such instances, only metal planks should be used for the entire scaffold platform, including the toe-boards.*

#### **Inspection and Tagging:**

- *All Scaffolds will be tagged showing the date of erection and inspected (by a certified, competent inspector) every 7 days.*
- *Suppose an engineer has prepared design drawings. In that case, the engineer shall inspect the scaffolding on site and provide a sign-off certificate against the scaffold design drawings prior to use.*
- *All scaffolds shall be reinspected after any modifications, adverse weather condition or any incident.*
- *Follow ES Scaffolding Safety procedure (HSD-GR-PR-011) all the time.*

#### **14. Lifting Activities**

The Contractor shall ensure that all lifting tackles, lifting appliances, mobile work platforms, and hoists under his control have up-to-date certification. Prior to their use in Emirates Steel premises, the Contractor shall provide copies of test certificates to the end user Department. No person (Contractor, Sub-Contractor, or anybody else) shall be permitted to operate a lifting device (material or personnel) unless they are adequately trained. Documentation of the training shall be furnished to Emirates Steel upon request. Each operator shall carry on his/her personal certification that validates their ability to operate the lifting device being used.

**Refer following ES procedure to ensure safety lifting.**

- **HSD-GR-PR-024 Safe use of Lifting Equipment and Lifting Accessories**
- **HSD-GR-PR-037 Safe use of Mobile Cranes**

#### **Mechanical Lifting**

**In general, All contractors have to ensure that safe lifting would entail many safety control measures including, but not limited to;**

- **Obtaining a Permit to Work in lifting operations**
- **Prepare a lifting plan for all the activities and approve it by the ES lifting-appointed personnel before starting the job. Competent Lifting supervisor shall be deployed.**
- **Barricading the lifting area to prevent unauthorized entry where the lifting occurs.**
- **Preventing any person from walking under a suspended load for any reason.**
- **Ensuring that the lifting device; Crane; Forklift; Tele-handler is certified and can lift the load safely.**
- **Only a trained banksman/rigger should give signals to the operator.**
- **Tag lines should be used to control all loads.**
- **Never leave a suspended load unattended.**
- **If the lift is complicated or awkward, always seek the advice of a Rigger before starting the lift.**
- **Never lift any load if you are;**
  - **Unsure of the weight of the load**
  - **Do not have the correct equipment.**
  - **Unsure if you can control the lifting and landing areas throughout the lift.**

#### **15. Confined Space Working**

Contractors wishing to enter a confined space shall only do so under the direction of an authorised Emirates Steel person. In all cases a permit will be required.

All contractor persons (including Emirates Steel personnel) must have received training in confined space. This training must have included as a minimum:



- Principles of Confined Space Hazards
- Awareness of Confined Space Risk Assessments
- Principles of a Permit to Work System
- Use equipment and tools safely and in accordance with manufacturers' instructions.
- Understand and demonstrate the duties of the Safety Attendant.
- Understanding of the principles of Confined Space Communications (methods, types and limitations).
- Understanding of the Principles and Procedures for Atmospheric Monitoring.
- Understanding the principles of Ventilation (methods, types, limitations).
- Prepare and use emergency escape breathing apparatus in accordance with manufacturers' specifications.
- Follow procedures and work safely.
- Prepare to enter, work and exit a Confined Space safely.
- Principles of Confined Space Hygiene.

Demonstrate an understanding of Confined Space Emergencies and how to deal with them. Training can be provided by a competent trainer and could be in-house. If you are using one of your employees for this, the trainer should have the 'train the trainer' certification to ensure they are up to date on best practices. They shall be qualified in confined spaces rescue and the trainer must be approved by Emirates Steel health and Safety department.

If you don't have the skills or resources to train your employees internally, you may need to use an external training provider.

evidence of the confined spaces training provided including certificates must be produced from a third-party training provider or from an internal competent trainer.

The contractor is responsible for the provision of all emergency resources including rescue personnel, rescue equipment and rescue plans.

***All rescue personnel identified in the rescue plan shall be certified by the third-party agency and shall be available full time outside the confined space along with the rescue equipment's as defined in the rescue plan.***

***Refer following ES procedure while working in confined space.***

- ***HSD-PR-015 Confined Space Procedure***

## **16. Rescue Plan arrangement:**

Contractors must develop a rescue plan for all the relevant activities they are involved in such as

Confined Spaces, Work at heights and other related activities as identified in the risk assessment.

- Submit the appropriate Rescue plans along with the JSA and Method statement for Emirate steel H&S representatives verification and agreement at least 48 hours prior to the work commencing on site
- Before developing a Rescue plan, contractors' team must visit the confined space location and carryout a risk assessment in order to identify the resources required in order to produce a suitable and sufficient safe system of work including a rescue plan and to specify appropriate rescue equipment.
- Contractors may request ES EIT team for expert rescue advice in advance.
- It is the contractor's responsibility to make sure all the required resources are deployed and implemented accordingly ***on ES site.***



## **17. Housekeeping**

Contractors shall at all times keep the job site (and adjoining premises, driveways, and walkways) clean and free from accumulated debris, trash and rubbish.

At the conclusion of the job, Contractor shall be responsible for removing all remaining materials, supplies, trash and leave the area safe, clean and ready for use. All the waste materials generated from the work need to be disposed as per the disposal procedure applicable. The hazardous waste material to be separated and to be discussed with ES in charge person for disposal procedure.

Contractor employees are not allowed to interfere with any material or tools in the plant area, where it may affect the running plant or machinery. All Contractor employees are to be briefed about the housekeeping rules applicable. ***Contractors shall fully adhere to the 5S strategy of ES and conduct regular 5S audits for their work area.***

***Upon completion of work, the contractor should remove all their items, tools, equipments, materials, scaffolding etc from the ES site, and demobilize in a timely and safe manner. Failure to remove these items including tools, equipment, scaffolding material etc, from ES site within 15 days of job completion will result in ES scrapping them without prior notice to the contractors.***

## **18. Smoking**

***Smoking, including vaping, is not permitted on site other than in the designated smoking area. Smoking is prohibited in any indoor working environment (e.g. Offices-Including single occupancy offices, meeting rooms, warehouse buildings and workshops), including toilets and vehicles (private or company). Any outdoor worksite where a potential flammability hazard exists. Indoor seating areas of canteens, rest rooms, substations, electrical rooms, storage rooms and inside vehicles. Smoke only in designated areas where designated smoking area signage is displayed and cigarette buds should be thrown in designated bins only***

## **19. Compressed Gas Cylinder Safety**

***All contractors are ensuring to apply the following procedure minimum precautions for the safe storage, handling, and use of compressed gas cylinders.***

- ***Gas cylinders should be placed on a designated cylinder rack that is securely fastened with a chain.***
- ***For the safe transportation of gas cylinders, it is essential to use the designated gas cylinder and not rely on pick-up trucks.***
- ***Relevant signage should be displayed to indicate the transportation of gas cylinders.***
- ***All risk control measures should be in place while transporting gas cylinders.***



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Refer following ES procedure for Compressed Gas Cylinder Safety.

- HSD-GR-PR-046 Use of Compressed Gases and Air Procedure

## 20. Safety Barriers

*On every work site, the proper use of safety barriers shall be done to ensure it protects you from hazards. The following work operations usually require the area to be cordoned off:*

- Working at heights and the erection and dismantling of the scaffolding.
- Hot Work
- The use of aerial work platforms
- The use of radioactive sources (dedicated barrier equipment with appropriate signage).
- Demolition work
- Excavation work
- Lifting Activity
- Work with hazardous chemicals etc.

*A Risk assessment/job safety analysis will identify the need for any other barriers. No one may remove/change barriers without an agreement with the person responsible for the barrier (such as a supervisor). The responsible Contractor shall use appropriate barriers with proper signage within the work areas. There are different types of safety barriers that can be found on any work site.*

### Type of barriers

*Types of barriers are used; permanent barricades and temporary barricades. Permanent barricades are fixed, painted structures or barriers such as gates and fences Hard barriers are generally constructed from scaffolding standards to protect open excavations or any other floor/ground openings. Soft barriers for easy removal include coloured tapes, ropes, and safety cones.*

*Barricading materials such as tape and or mesh shall be installed with the top edge at a height between 900 mm to 1200 mm. Barricade tape is temporary and for short duration service, if long term barricading is identified, then other means of barricades or hard barricade shall be established. No one is allowed to step over the barricading tapes, and it should be firmly tightened to ensure barricading tapes is not sagging. Sufficient safety cone availability shall be ensured by the contractor to place the independent barricade. The damaged safety cone shall not be used at the site by the contractor. The contractors are not allowed to tie any barricading tapes with the existing plant structures as independent barricading shall be provided by using the safety cones.*

### Soft Barricades:





- *Soft barricading can be used to prevent entry of people and equipment as an immediate and short-term control measure. Soft barricades are typically plastic bunting tapes of various colours or mesh that are not self-supporting.*
- *They do not provide any mechanical strength, but are primarily used to define danger, caution and commissioning zones used in conjunction with warning tags to inform workers of the reason for the defined zone.*
- *This type of barricading will be used when the risk assessment indicates that the risk of using soft barricading is acceptable.*
- *Contractor to place the independent barricade by using the cones & barricading tapes.*
- *Red and White - Danger Tape: "Danger DO NOT Enter"*
- *Yellow and Black – Caution Tape: "Access Permitted Caution Required"*
- *Blue and White – Commission Tape "No Unauthorized Access allowed"*
- *Magenta Purple and Yellow - (Radiography work)*
- *Traffic Cones and Bollards- Traffic cones and bollards should not be used to define exclusion zones as personnel can easily enter zones.*

#### **Hard Barricades:**

*The use of soft barricades in certain situations is not an adequate control and hard barricading shall be used to mitigate the exposure to the risk(s). More rigid devices may be used for temporary barricading. The following (but not limited to) are examples of where this applies (Open trenches / excavations, Floor Openings, Areas where handrails or grid mesh have been removed).*

#### **21. General**

Horseplay, fighting, gambling, possessions of firearms or explosives, use of regulated drugs, or alcohol, being under the influence of drugs or alcohol, theft, vandalism, sabotage, and distribution of unauthorised literature shall not be permitted. Those involved in such activities shall be removed from the worksite and shall be liable for punishment by any applicable law.

#### **22. Contractor-Related H&S Meetings and Performance Management**

Contractors shall attend all H&S Performance Review meetings with Emirates Steel upon invitation. These will be on 3 levels:

- a) Regular activity-specific and Contractor/contract-specific H&S Performance Management Meetings held between the Emirates Steel End User Dept. and the Contractors engaged on the activities/contract in question.
- b) Monthly, site-wide Contractor H&S Review Meetings shall be held between Emirates Steel and representatives of Contractor companies currently engaged.
- c) Bi-annual Contractor Safety Management Board meetings shall be held between Executive-level representatives of Emirates Steel and the Contractor companies currently engaged.

Contractors shall have an expectation that Emirates Steel will deploy a number of Contractor H&S Performance Monitoring tools and processes during execution of contracted activities, such as:

- Safety Observations
- Safety Inspections
- Permit to Work Audits



- H&S Audits

These are positive and inclusive management and monitoring tools aimed at continuously improving Contractor H&S performance and behaviours.

All Contractor and Sub-Contractor employees shall be expected and encouraged to participate in the Emirates Steel Safety Observation program, which is open to everyone on an Emirates Steel site. Everyone on site is empowered to observe and interact positively with personnel, identifying safe and unsafe behaviour and conditions, triggering improvement action if appropriate.

If the Contractors have the responsibility to close-out any improvement action items arising from the various H&S meetings, audits and observations, **actions**, they shall do so as per the agreed timeline. In exceptional cases where Contractors are not able to attend H&S meetings, and close out associated action items in timely fashion, the Contractors shall update their Emirates Steel focal point and Emirates Steel **FCA** in writing in advance.

Contractors shall also regularly hold their own H&S Performance Review Meetings based on set KPIs and their H&S Plans.

***Each Contractor shall have dedicated H&S Officers, approved by Emirates Steel, assigned to their site teams as per section 4. The Contractor H&S officers shall ensure that their H&S Files as per section 2 are continuously updated with records and documentation which is current, as long as the contractor has a contract with Emirates Steel.***

Contractors shall have the expectation that Emirates Steel may request to conduct a Facilities H&S Inspection of the Contractor's local base camp, external to Emirates Steel, at any time. This third-party inspection is deployed in the spirit of assisting with, and supplementing, Contractors own H&S performance improvement programs. Contractors shall be required to submit Contractor H&S Performance reports/statistics to Emirates Steel **FCA**/EHS Department, completed on a monthly basis.

### **23. Disciplinary**

In cases where there has been a breach of the safety rules and these requirements; Emirates Steel may apply Emirates Steel policies and procedures and the relevant laws including but not limited to the "Disciplinary Rules" provided in Chapter VI of the Law *UAE Federal Labour Law no. 8 of 1980*. This entitles Emirates Steel to take any of the following actions against its employees and or where applicable, the Contractors depending on the severity of the breach. In serious cases involving Contractor's personnel Emirates Steel may take action directly against the concerned Contractor or request that the Contractor employer takes the necessary action against his own employee(s):

- Warning (verbal or written).
- Fine (individual or company).
- Suspension from work with reduced pay for a period not to exceed 10 days.
- Denial or deferment of periodical allowance.
- Denial of promotion.
- Dismissal without prejudice to severance pay.
- ***Dismissal from all ES future inquiries and orders.***
- Dismissal with denial of all or part of the severance pay. This penalty may not be imposed for reasons other than those exclusively specified in Article 120.

*"Article 120 of the UAE Federal Labour Law No. 8 of 1980" shall be applied, which stipulates: "If the worker disobeys instructions respecting industrial safety or the safety of the workplace, on condition that such instructions are in writing and have been posted up at a conspicuous place and, in the case of an illiterate worker, that he has been acquainted with them orally".*



#### **24. ES Security Requirements and Gate pass System – VMS**

*Contractors and their subcontractors working on the ES site strictly follow ES security guidelines related to gate passes, material/equipment, and manpower mobilizations and demobilization.*

*Refer following ES procedure for Security Requirements.*

- *FSD-SC-PR-001 Security Services Procedure*

*Gate Pass—Contractors shall apply all kinds of Gate Passes, including Equipment and Material (IN & OUT), on EM Steel website in the visitor management system (VMS). (Accessibility: VMS can be accessed through EM Steel website: [www.emsteel.com/Our Business/ Business with us/Visitor Management System](http://www.emsteel.com/Our-Business/Business-with-us/Visitor-Management-System) OR by copying and pasting the URL below on a browser: [https://www.emsteel.com/business-with-us/.](https://www.emsteel.com/business-with-us/))*

*The Contractor is responsible for uploading all relevant and valid documents into the ES VMS System. Additionally, it is essential that the Contractor and their subcontractor possesses the specific approved gate pass in order to gain entry to the ES site. Compliance with these requirements is crucial for ensuring smooth operations and maintaining ES site security.*



**Emirates Steel and all of its employees thank you in advance for your adherence to these rules and in helping to maintain and improve the overall EH&S Awareness and Performance on our premises.**

**Siva Goluguri**

**Manager – EH&S Governance & Compliance**

Date: 08<sup>th</sup> October 2024

**Ahmed Al Saadi**

**Manager - Health & Safety Operation**

Date: 10th October 2024

Signed by:  
*Fatima Sulaiman Al Hammadi*  
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**Fatima Al Hammadi**

**Director- Procurement**

Date:

**Egor Yurkin**

**VP- Environment Health & Safety**

Signed by:  
Date:   
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**Saeed Al Ghafri**

**CEO - Emirates Steel**

Date:

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