



CONVEYOR GROUP

HEALTH, ENVIRONMENT AND SAFETY POLICY

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CONVEYOR GROUP HES POLICY MANUAL

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HEALTH, ENVIRONMENT & SAFETY POLICY STATEMENT

The concept of Health, Environment & Safety (HES) is quite new in Bangladesh. As Conveyor Group have been working in Oil, Gas and Power sector for quite some time we have already formed and adopted HES policy in our offices, sites and work places.

It is the policy of Conveyor Group that the health and safety of its clients, employees and sub-contractors shall be primary importance at all times, while at the same time it shall operate to minimize any impact its operations may have on the environment.

It is our responsibility to establish, implement and maintain health and safety management systems to ensure compliance with the requirements of this policy and any applicable regulations.

Our objectives are to:

- Provide safe places of work and healthy working environments for our clients employees and sub-contractors.
- Reduce and ultimately prevent injuries at work places by developing safe working practices, training employees in the practices and monitoring the results in each department.
- Promote health, environment and safety protection as an integral part of the duties of management along with the education of all employees.
- Supply appropriate information, instruction and training to promote a high degree of awareness of health, environment and safety concerns and the responsibility of each employee to prevent injury to themselves and others.
- Comply with all laws and regulations covering occupational health and safety and the environment.
- Develop and implement policies and procedures designed to promote safe working practices and environmental protection and encourage healthy and safe operating conditions in all companies.
- Implement practices and procedures for the use, handling, storage and transportation of materials and substances and to eliminate discharges and omissions that could harm the environment.

HEALTH, ENVIRONMENT & SAFETY (HES) POLICY

1.1 HES Management Program

The Company shall:

- Comply with local regulations.
- Ensure that all personnel understand their specific HES responsibilities.
- Encourage all personnel to take an active part towards the improvement of the HES program.
- Ensure that all managers and supervisors actively carry out the intent of the HES policy.
- Work with and contribute constructively to HES initiatives within the industry.
- Conduct HES audits of the Company activities on an on-going basis and publish.
- Continue to comply with the governing environmental and health regulations, and where appropriate, reducing waste, emissions and discharges.
- Provide employees with required HES training.

The Company shall prepare and implement an HES plan to facilitate the procedures listed above. This HES Procedures Manual is a record to learning about how best to prevent accidents and injuries. Not every hazard that occurs in daily activity is included, but of greatest exposure is addressed.

MANAGEMENT RESPONSIBILITY

2.1 Management Responsibility

The Technical Director is ultimately responsible for the Company's HES performances. He shall ensure that all personnel, who manage and are involved in operations, comply with the HES aspects of the Program.

2.2 Supervisors Responsibility

Although the success of any safety program requires the combined efforts of management, supervisors and the worker, the supervisor is the key man. It is the degree to which the supervisor applies the intent of the program and the principals of safety that governs the success of this program. Safety is an area of mutual interest between the supervisor and the worker and the supervisor must lead the way in developing the HES program. Some of the supervisor's responsibilities are:

2.3 HES Manager

The coordination of Company's HES program shall be the responsibility of the HES. Duties include:

- Advising and making recommendations to all supervisory personnel in the company.
- Monitor the overall safety program and help to identify critical areas.
- Manage and comply with local and industry specific safety and environmental reporting requirements.
- Keep management informed of the safety performance of the various divisions and recommended appropriate actions to improve performance.
- Development and implement safety programs.
- Administer and report to management on the status of workers compensation claims and property damage insurance claims.

2.4 Employee Responsibility

Conveyor Group management and supervisors expect the individual employee to cooperate in every respect with the company's safety program, so that the day-to-day operations may be carried on in such a manner, as to insure the safety of himself, his fellow employees, the client and company property. Therefore, each employee is charged with the following responsibilities.

- Observe all safety and regulations.
- Report any unsafe conditions or practices to your supervisor.
- Know how to perform jobs assigned and perform them properly.
- Do not undertake any job you do not understand – ask your immediate supervisor if there are any questions or any doubt.
- Wear and use all safety equipment required by the job to be performed.
- Participate in safety meetings held by your supervisor.
- Report all injuries immediately to your supervisors.
- Cooperate with supervisor when injury and accident investigations are being made so that accident causes can be determined and corrective actions taken.
- Report any and all defective tools or equipment immediately.

2.5 HES Meeting

Regular HES meetings shall be held at all company work sites in accordance with Company policy. The frequency of the meetings will be contingent upon the particular activity or risk, and or client requirements.

2.6 Management Review

The Company HES Management System shall be subject to regular review by management personnel. These reviews will take place every four months and shall be documented and shared with all managers having responsibility for the HES program. All recorded accidents and near misses will reviewed by upper management weekly.

HES DOCUMENTIONS & RECORDS

3.1 HES System Documentation

The HES program is comprised of the following documentation system.

- The HES POLICY Manual which states the Company's policy objectives, and which defines the method by which the Company shall comply with the overall intent of the HES Program.

3.2 Documentation Control

The HES Manager shall be responsible for the control and maintenance of HES documents. This includes filling the annual and monthly reports, environmental reports, client reports and Company statistics. HES records will be kept on file in accordance with local law and industry standard. All revisions and updates will be the responsibility of the HES Manager.

HEALTH, ENVIRONMENT AND SAFETY PROCEDURE

4.1 General

All company operations shall adhere to the HES Procedures Manual. Health and safety guidelines, safety rules and client regulations must be taken into consideration. Where there is a conflict involving operational requirements, the more stringent of the two safety rules will take precedent. If a conflict involving an HES practice cannot be resolved appropriate manager must notified immediately.

4.2 Health

It is a company policy that all employees pass a medical examination, work fitness evaluation and random drug screening. Employees may be required to have a medical examination on other occasions when it is job-related and consistent with business activity. Such occasions may arise when there is a potential for exposure to toxic or unhealthful situations, or when there is a questions concerning an employee's ability to perform job duties.

4.3 Substance Abuse

Compliance with the Company's Drug & Alcohol Free Workplace Policy (HES Procedure Manual) shall be a condition of employment. We are committed to a drug & alcohol free workplace. This is achieved by the maintenance of an active anti-drug and anti-alcohol plan. Any on-duty employee (or contractor) with a detectable level of alcohol, drugs or controlled substances is prohibited from performing services for the Company and will not be permitted to remain at work.

4.4 Safe Work Practice

Field employees work in an environment of potential risk from dangerous machinery, materials, fire, weather and other conditions. Safe working practices must be followed at all times.

4.5 Personal Protective Equipment (PPE)

The use of PPE shall be in compliance with local and industry related regulations. Personnel shall be issued the necessary PPE for the operation to be performed. Employees will also receive training in accordance with OSHA PPE regulations consisting of: Limitations of PPE, donning, maintenance, inspection, and when to wear the PPE. All PPE shall meet ANSI standards.

4.6 Smoking/Non-Smoking

Our buildings are smoke free areas. Other work places utilize designated smoking areas for employees to smoke. The on-site supervisor will have information regarding the smoke free areas and appropriate signs shall be posted.

RISK CONTROL

5.1 Risk Assessment

The Company shall identify and document HES risk in order to prevent and control the risk. As a minimum, the risk assessment will include consideration of the followings:

- Nature of work
- Location of work
- Potential for exposure to worksite hazards
- Potential consequences of incident (environmental, legal or delay in operations)

In some cases the risk or hazards can identify by observation. In other cases, measurements such as noise levels or gas detectors may be necessary to determine the level of risk. Emphasis will be placed on areas of operations or procedures that are identified as having the potential for greatest severity.

5.2 Risk Control

When risk or hazards have been analyzed and assessed, decisions can be made about control measures, which must be taken into account. The following risk control principles shall apply:

- Eliminate or minimize the risk by substituting safer operational procedures.
- Use engineering controls.
- Minimize the risk by the use of personal protection and equipment.

Employees involved in these areas of operations will receive appropriate HES training, participate in site-specific safety meetings and review job safety analysis (JSA's) that apply to the particular risk or hazard on a regular basis.

EMERGENCY PROCEDURE

6.1 Emergency Procedure

The company shall establish emergency procedures at all work locations. These shall define specific responsibilities for the management of a response to an emergency. The company shall also prepare interface documents linking the HES emergency procedures to its client and where appropriate to the client to ensure responsibilities are known.

The company shall provide training in these procedures to all personnel in accordance with the HES Procedures Manual.

6.2 Emergency Drills

Emergency drills shall be held monthly and documented. These drills will consist of man over site, fire drills, spill containment drills and HAZMAT drills.

TRAINING

7.1 Training

Training is an essential part of the Company's HES management system. It is the Company policy that all employees shall be provided HES training appropriate to their employment. The responsibility for staff training is that of the Department Managers. The HES Manager will assist and counsel Department Managers in the HES training matters.

The Company shall provide:

- Training to cover all levels of staff.
- A system for the identification of training needs.
- Analysis of special training needs.
- HES refresher training on a periodic basis.

7.2 Safety Orientation

All new and contract employees will receive an HES orientation which includes familiarization with the HES Procedure Manual. This orientation program is supplemented with HES training which is appropriate to the level of employment.

The orientation will provide employees with basic practical understanding of the company's safety requirements, the general hazards, risk, accident and emergency procedures that apply to their specific work location.

Employees will be required to attend all safety meetings pertinent to their area of operations. A supervisor will conduct the safety meeting. The contents, date and who attended will be documented on a Company safety form.

7.3 First Aid

All employees will be trained in first aid and CPR. Refresher training shall be provided bi-annually. The company shall undertake to maintain an acceptable stock of first aid supplies and equipments for emergency use. This shall be the responsibility of the Security & Safety Manager.

7.4 Fire fighting

All employees will receive training in fire fighting techniques and equipments to address the fire concerns at the company's facility.

HES MONITORING AND REPORTING

8.1 General

The Company's annual HES Plan shall outline its proposed actions for the year ahead and specific targets for HES management and performance. The Company shall maintain a hierarchy of reporting to ensure that HES related issues are monitored at all levels of the organization.

8.2 Incident Reporting

The Company shall require that all HES Incidents be reported immediately. Incidents must be turned into the respective supervisor for review and forwarded to the HES. These Incident Reports will be kept on file in accordance with HES Documentation & Records policy of this manual.

SAFE WORK FLOWCHART

