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1. INTRODUCTION

HSE Management System

This manual describes the HSE Management System, which is established and implemented by MMEC MANNESMANN LLC in order to ensure that the quality of products and services delivered meets or exceeds customer requirements at optimum costs for the organization, to provide safe and healthy workplaces, prevent work-related injury and ill health and to protect the environment and respond to changing environmental conditions.

The purpose of this manual is to:

- Define the scope of the HSE Management System applied in MMEC MANNESMANN LLC,
- Give details of and justification for not applicable clauses,
- Describe the interactions between the processes,
- Define the authorities and responsibilities of the top management personnel,
- Provide general procedures (or reference to them) for all activities necessary for the HSE Management System,
- Present our HSE Management System to our client(s) or other interested parties to inform them what specific controls are in place and implemented.

2. SCOPE

MMEC MANNESMANN LLC has developed and implemented a HSE Management System to satisfy the needs of its clients, comply with applicable laws and regulations, to determine environmental aspects of its activities, products and services considering a life cycle perspective to improve occupational health and safety, eliminate hazards and minimize HSE risks, take advantage of HSE opportunities, and address HSE management system nonconformities associated with its activities and improve the HSE Management of the company.

The HSE Management System complies with the requirements of the international Standards ISO 14001:2015 and ISO 45001:2018. It covers quality, environment, health and safety-related activities of the concerned departments or areas.

The scope of the HSE management system of MMEC MANNESMANN LLC includes,

Ref Document: Trade License

The following reference documents have been used in the preparation of MMEC MANNESMANN LLC's HSE manual.

ISO 19011:2018 - Guidelines for Internal Auditing of HSEMS

ISO 14001:2015 - Environmental Management system- Requirements

ISO 45001:2018 - Occupational health and safety management system requirements

ISO 31000:2018 - Risk Management



3. TERMS & DEFINITIONS

S.No	Terms	Definitions
1.	audit	systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled
2.	audit programme	set of one or more audits planned for a specific time frame and directed towards a specific purpose
3.	audit scope	extent and boundaries of an audit
4.	audit plan	description of the activities and arrangements for an audit
5.	audit criteria	set of policies, procedures or requirements used as a reference against which objective evidence is compared
6.	audit findings	results of the evaluation of the collected audit evidence against audit criteria
7.	auditee	organization being audited
8.	auditor	person who conducts an audit
9.	HSE management system consultant	person who assists the organization on HSE management system realization, giving advice or information
10.	technical expert	person who provides specific knowledge or expertise to the audit team
11.	observer	person who accompanies the audit team but does not act as an auditor
12.	competence	ability to apply knowledge and skills to achieve intended results
13.	compliance obligations	legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with
14.	conformity	fulfilment of a requirement
15.	nonconformity	non-fulfilment of a requirement

16.	context of the organization	combination of internal and external issues that can have an effect on an organization's approach to developing and achieving its objectives
17.	consultation	seeking views before making a decision
18.	continual improvement	recurring activity to enhance performance
19.	correction	action to eliminate a detected nonconformity
20.	corrective action	action to eliminate the cause of a nonconformity and to prevent recurrence
21.	customer	person or organization that could or does receive a product or a service that is intended for or required by this person or organization
22.	design and development	set of processes that transform requirements for an object into more detailed requirements for that object
23.	document	information and the medium on which it is contained
24.	documented information	information required to be controlled and maintained by an organization and the medium on which it is contained
25.	environment	surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships
26.	environmental aspect	element of an organization's activities or products or services that interacts or can interact with the environment
27.	environmental impact	change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects
28.	external provider	provider that is not part of the organization
29.	hazard	source with a potential to cause injury and ill health
30.	incident	occurrence arising out of, or in the course of, work that could or does result in injury and ill health

31.	Accident	An incident where injury and ill health occurs is sometimes referred to as an "accident".
32.	Near Miss	occurrence arising out of, or in the course of, work that could or does result in injury and ill health
33.	infrastructure	system of facilities, equipment and services needed for the operation of an organization
34.	injury and ill health	adverse effect on the physical, mental or cognitive condition of a person
35.	interested party	person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity
36.	life cycle	consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal
37.	monitoring	determining the status of a system, a process or an activity
38.	outsource	make an arrangement where an external organization performs part of an organization's function or process
39.	objective	result to be achieved
40.	Policy	intentions and direction of an organization, as formally expressed by its top management
41.	strategy	plan to achieve a long-term or overall objective
42.	vision	aspiration of what an organization would like to become as expressed by top management
43.	mission	Organization's purpose for existing as expressed by top management
44.	participation	involvement in decision-making
45.	procedure	specified way to carry out an activity or a process
46.	process	set of interrelated or interacting activities which transforms inputs into outputs
47.	HSE manual	specification for the HSE management system of an organization

48.	HSE plan	specification of the procedures and associated resources to be applied when and by whom to a specific object
49.	record	document stating results achieved or providing evidence of activities performed
50.	project	unique process, consisting of a set of coordinated and controlled activities with start and finish dates, undertaken to achieve an objective conforming to specific requirements, including the constraints of time, cost and resources
51.	project management	planning, organizing, monitoring, controlling and reporting of all aspects of a project, and the motivation of all those involved in it to achieve the project objectives
52.	quality	degree to which a set of inherent characteristics of an object fulfills requirements
53.	quality assurance	part of quality management focused on providing confidence that quality requirements will be fulfilled
54.	quality control	part of quality management focused on fulfilling quality requirements
55.	requirement	need or expectation that is stated, generally implied or obligatory
56.	regulatory requirement	obligatory requirement specified by an authority mandated by a legislative body
57.	statutory requirement	obligatory requirement specified by a legislative body
58.	risk	effect of uncertainty
59.	risks and opportunities	potential adverse effects (threats) and potential beneficial effects (opportunities)
60.	OH&S risk	combination of the likelihood of occurrence of a work-related hazardous event(s) or exposure(s) and the severity of injury and ill health that can be caused by the event(s) or exposure(s)

61.	OH&S opportunity	circumstance or set of circumstances that can lead to improvement of OH&S performance
62.	traceability	ability to trace the history, application or location of an object
63.	worker	person performing work or work-related activities that are under the control of the organization
64.	workplace	place under the control of the organization where a person needs to be or to go for work purposes
65.	work environment	set of conditions under which work is performed
66.	product	output of an organization that can be produced without any transaction taking place between the organization and the customer
67.	service	output of an organization with at least one activity necessarily performed between the organization and the customer
68.	verification	confirmation, through the provision of objective evidence, that specified requirements have been fulfilled
69.	validation	confirmation, through the provision of objective evidence, that the requirements for a specific intended use or application have been fulfilled

4. CONTEXT OF THE ORGANIZATION

4.1 Understanding Context of the Organization

MMEC MANNESMANN LLC will determine both internal and external issues that are relevant to the organization and that have both a direct influence on the effectiveness of the HSE management and an impact on global environmental and sustainability issues. By doing the activities MMEC MANNESMANN LLC will consider the following environmental issues when developing and implementing its business strategy:

- Air quality including both local and global impacts
- Water quality and preventing contamination of controlled waters
- Land use
- Existing contamination and remediation issues
- Natural resources and their depletion
- Protection and enhancement of both local ecology and biodiversity and that of the wider community

In addition to these core values MMEC MANNESMANN LLC will also consider the implications and risks to our business in respect of:

- Cultural and social responsibility
- Legal and regulatory regulations and guidance
- Financial implications
- Use best available technologies where financially practical and feasible

In applying the above criteria and techniques MMEC MANNESMANN LLC will actively manage and implement programs, procedures, and its business strategy in order to militate against pollution and harm to the environment and global climate change. These aspects will form the core strategy of MMEC MANNESMANN LLC when managing both its risks and opportunities for enhancing the local and global environment. These key strategies and management programs will form the core values of MMEC MANNESMANN LLC when implementing and managing its HSEMS.

Reference Document: Understanding Context of the Organization Procedure

4.2 Understanding the needs and expectations of interested Parties

MMEC MANNESMANN LLC will carry out regular reviews with regards to all interested parties whether internal or external. By doing MMEC MANNESMANN LLC will consider the needs and expectations of interested parties in terms of its overarching environmental strategy and performance.

In the case of an interested party perceiving itself to be affected by the organization's decisions or activities related to environmental performance, the organization considers the relevant needs and expectations that are made known or have been disclosed by the interested party to the organization.

Organization realized that some interested party requirements reflect needs and expectations that are mandatory because they have been incorporated into laws, regulations, permits and licenses by governmental or even court decision.

Reference Document: Understanding Context of the Organization Procedure

4.3 Determining the scope of the HSEMS

The scope of the HSEMS is intended to clarify the physical and organizational boundaries to which the HSEMS applies, especially if MMEC MANNESMANN LLC is a part of a larger organization. An organization has the freedom and flexibility to define its boundaries. It may choose to implement this International Standard throughout the entire organization, or only in specific part of the organization, as long as the top management for that part has authority to establish a HSEMS.

MMEC MANNESMANN LLC has established documented, implemented and maintained a HSEMS and has ensured its continual improvement through various means in accordance with the requirements of international standards as well as organization's own requirements.



Reference Documented: Trade License

4.4 HSE Management System and its process

This Management System manual is based on the requirements of ISO 14001:2015 as well as ISO 45001:2018 and details the specific controls established, documented, and maintained at MMEC MANNESMANN LLC.

This manual demonstrates the methodology adopted at MMEC MANNESMANN LLC to meet the requirements specified in these standards and refers to documented procedures, established and maintained at MMEC MANNESMANN LLC.

Controlled copies are distributed in accordance with the distribution list. This HSE Manual is subject to periodic review by the top management and HSE management representative/HSE-Officer at periods not greater than one year. The HSE Manual will be revised if necessary, in whole and reissued to controlled copy holders. The HSE Management representative/HSE-Officer is responsible for the issue and collection of HSE Manuals as and when they are revised.

5. LEADERSHIP & WORKER PARTICIPATION

5.1 Leadership and Commitment

The top management of MMEC MANNESMANN LLC is taking responsibility and accountability for the effectiveness of the HSEMS and providing resources to ensure that work-related injury and ill-Health is prevented and safe and healthy workplaces and activities are provide, QHSE Policy and HSE Objectives are established and are compatible with the strategic direction and the context of the organization.

The top management ensures that HSEMS requirements are integrated into MMEC MANNESMANN LLC's business processes, and that the HSEMS is achieving its intended outcomes.

The top management of MMEC MANNESMANN LLC also demonstrates leadership and commitment with respect to the HSE management system by:

- ensuring and promoting continual improvement
- directing and supporting persons to contribute to the effectiveness of the HSE management system,
- supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility,
- developing, leading and promoting a culture in the organization that supports the intended outcomes of the HSE management system,
- protecting workers from reprisals when reporting incidents, hazards, risks and opportunities,
- ensuring the organization establishes and implements a process for consultation and participation of workers,
- supporting the establishment and functioning of health and safety committees



5.2 QHSE Policy

Top Management ensures that the QHSE policy is appropriate to the purpose of the establishment, includes a commitment to comply with requirements and continually improve the effectiveness of the SHEMS and prevention of pollution, injury and ill health, includes a commitment to comply with applicable legal requirements and with other requirements to which the organization subscribes, provides a framework for establishing and reviewing objectives and targets, is documented, implemented and maintained, is communicated to all persons working for or on behalf of the organization with the intent that they made aware of their individual obligations, is available to interested parties, and is reviewed periodically for continuing suitability as per procedure for Management Review.

The QHSE policy is available as documented information for workers and other interested parties and communicated with in the organization through

- Notice board
- In team briefing and toolbox talks
- Verbal communication to Staff
- Internal Memos
- Email
- Display of QHSE policy and objectives
- Management Reviews / minutes of meetings
- Internal training activities or induction

Top management of MMEC MANNESMANN LLC reviews the policy as time to time if there is a change in technology, organization, and legislation or if there is a major accident.

Reference Document: QHSE Policy

5.3 Resources, Roles, Responsibility, Accountability and Authority

Top management of MMEC MANNESMANN LLC is overall responsible for the implementation HSEMS. For the project specific roles, responsibilities, authorities & accountabilities refer to project specific Quality & HSE Plans.

Top Management has appointed a Management Representative, (from the concerned section/department) he is responsible for the ensuring that the HSEMS is established, implemented, and maintained in accordance with ISO 14001:2015 and ISO 45001:2018 Standards.

Ensuring that reports on the performance of HSEMS are presented to top management for review during the management review meetings and used as a basis for improvement of the HSEMS.

Management Representative is responsible to carry out the above functions with the help of the management, HSE Staff & all employees.

The roles, responsibilities, accountabilities, authorities, and their interrelation are defined and communicated in various forms such as:



- Job Descriptions
- Organizational Chart
- Procedures
- HSE Manual

5.4 Participation and Consultation

MMEC MANNESMANN LLC ensures that appropriate communication processes are established, implemented and maintained internally between all levels and that communication takes place regarding the effectiveness of the HSEMS, policy, reported non-conformities (see documented procedures, office memos, meetings minutes,...etc.), communication with contractors and other visitors to the workplace, receiving, documenting and responding to relevant communication from external interested parties.

A procedure is also established, implemented, and maintained for the participation of workers and consultation with contractors where there are changes that affect the HSE.

MMEC MANNESMANN LLC is committed to:

- provide mechanisms, time, training and resources necessary for consultation and participation
- provide timely access to clear, understandable and relevant information about the HSE management system
- determine and remove obstacles or barriers to participation and minimize those that cannot be removed
- emphasize the consultation of non-managerial workers

Reference Document: Consultation, Communication, and Participation

6. PLANNING

6.1 Actions to address risks & opportunities

6.1.1 General

MMEC MANNESMANN LLC has developed a risk management framework that enables the organization to manage various organizational risks and opportunities. MMEC MANNESMANN LLC determines and assesses the risks and opportunities that are relevant to the intended outcomes of the HSE management system associated with changes in the organization, its processes or the HSE management system.

MMEC MANNESMANN LLC addresses risk and opportunities as

- Identify what risk and opportunities are
- Analyze and prioritize the risk and opportunities in the organization
- Plan actions to address the risk and opportunities
- Implement the plan



Addressing risk and opportunity MMEC MANNESMANN LLC consider:

- issues of the organization
- hazards
- environmental aspects
- OHS risks and other risks
- OHS opportunities and other opportunities
- legal requirements and other requirements (Compliance Obligation)

Reference Documents: Risk and Opportunity Management Procedure

6.1.2 Hazard Identification, Environmental Aspects, and assessment of Risk and Opportunities

MMEC MANNESMANN LLC has established, implemented and is maintaining a procedure for Hazard Identification and Risk Assessment for the ongoing hazard and environmental aspects identification, risk assessment, and determination of necessary controls.

6.1.3 Hazard identification

MMEC MANNESMANN LLC has established, implemented and maintains the procedure for hazard identification that is on-going and proactive. Hazard identification helps the organization recognize and understand the hazards in the workplace and to workers, in order to assess, prioritize and eliminate hazards or reduce OHS risks. Hazard can be physical, chemical, biological, psychosocial, mechanical, and electrical or based on movement and energy.

To identify the Hazard MMEC MANNESMANN LLC considers

- Social factors like work load, working hour, victimization, harassment & bullying, leadership & culture of the organization
- Routine and non-routine activities and situations including hazards arising from:
 - Infrastructure, equipment, material, substances, and the physical condition of the workplace.
 - product and service design, research, development, testing, production, assembly, construction, service delivery, maintenance, and disposal
 - human factors
 - how work is performed
- Past relevant incidents, internal or external to the organization, including emergencies, and their causes
- Potential emergency situations
- People, including consideration of:



- those with access to the workplace and their activities, including workers, contractors, visitors, and other persons
- those in the vicinity of the workplace who can be affected by the activities of the organization
- workers at a location not under the direct control of the organization
- **Other issues, including consideration of:**
 - The design of work areas, processes, installations, machinery/equipment, operating procedures, and work organization, including their adaptation to the needs and capabilities of the workers involved
 - Situations occurring in the vicinity of the workplace caused by work-related activities under the control of the organization
 - Situations not controlled by the organization and occurring in the vicinity of the workplace that can cause injury and ill health to persons in the workplace
- Actual or proposed changes in organization, operations, processes, activities and HSE management system (see 8.1.3)
- Changes in knowledge of, and information about, hazards.

Reference Documents: Hazard & Risk Management Procedure

6.1.4 Environmental Aspect

According to requirements of ISO 14001:2015, MMEC MANNESMANN LLC establishes and maintains a procedure to identify the environmental aspects of the activities that MMEC MANNESMANN LLC can control and over which MMEC MANNESMANN LLC is expected to have a direct influence, in order to determine those which have or can have significant impacts on the environment. MMEC MANNESMANN LLC will ensure that the aspects related to those significant impacts are considered in setting objectives and targets.

Reference Documents: Environmental Aspect Procedure

6.1.5 Assessment of OHS risks and other risks to the OHS management system

MMEC MANNESMANN LLC has established the procedure of Hazard Identification & risk assessment to determine the controls that are necessary to reduce the risk of injury and/or ill health. The purpose of risk assessment is to address the hazards that might arise in the course of the MMEC MANNESMANN LLC's activities and ensure that the risks to people arising from these hazards are assessed, prioritized and controlled.

This is achieved by:

- Developing a methodology for hazard identification and risk assessment;
- Identifying hazards;
- Estimating the associated risk levels, taking into account the adequacy of existing controls, based on an assessment of the likelihood of the occurrence of a hazardous event or exposure and the severity of injury or ill health that can be caused by the event or exposure;



- Determining whether these risks are acceptable viz a viz the organization's legal obligations and its HSE objectives
- Determining the appropriate risk controls, where these are found to be necessary
- Documenting the results of the risk assessment;
- Reviewing the hazard identification and risk assessment process on an ongoing basis.

The MMEC MANNESMANN LLC is considering the risks which are not directly related to the health and safety of people, but which affect the HSE management system itself and can have an impact on its intended outcomes.

Risks to the HSE management system include:

- Failure to understand the context of the organization
- Failure to address the needs and expectations of relevant interested parties
- Inadequate consultation and participation of workers
- Inadequate planning or allocation of resources
- An ineffectual audit programme
- An incomplete management reviews
- Poor succession planning for key roles
- Poor engagement by top management

Assessment of OH&S opportunities and other opportunities for the OHS management system

MMEC MANNESMANN LLC established procedure to assess

- HSE opportunities to enhance HSE performance, while considering planned changes to the organization, its policies, processes or activities
- Other opportunities for improving the HSE management system.

Opportunities to improve HSE performance can include:

- Consideration of hazards and risks when planning and designing facilities, processes, plant and equipment, and materials;
- Modification of working processes including the alleviation of monotonous and repetitive work;
- Introduction of new technology to ameliorate high-risk activities;
- Collaborating in forums that focus on issues relating to occupational health and safety.
- Introduction of job safety analysis and task-related assessments;
- Implementation of permit-to-work processes;
- Implementation of ergonomic and other injury prevention-related assessments;
- Improvement of the occupational health and safety culture of the organization;



Opportunities to improve the HSE management system include:

- Enhancing the visibility of top management's support for the HSE management system
- Improving worker consultation and participation in HSE decision making
- Enhancing the incident investigation process;
- Improving two-way communication on HSE issues and promoting HSE in the workplace
- Expediting corrective actions to address HSE nonconformities
- Implementing HSE objectives with the same passion as other business objectives
- Improving competency in identifying hazards, dealing with OH&S risks, and implementing appropriate controls
- Adopting a risk assessment approach to conducting HSE audits
- Viewing workers at all levels as a key resource of the organization
- Ensuring that the management review promotes a strategic and critical evaluation of the HSE management system.

Compliance Obligation

Management Representative (MR) ensures that a procedure was established, implemented and maintained to identify and have access to the applicable legal requirements to which the organization subscribes, and to determine how these requirements apply to the management system. The MR is also responsible for keeping the information updated.

Consistent with its commitment to compliance, the company has established, implemented and maintained a procedure for periodic evaluation of compliance with legal requirements.

Records of the results of evaluation will be kept.

Reference Document: Legal Requirements Procedure

Planning to take action

Actions planned by MMEC MANNESMANN LLC are managed through the HSE management system and are integrated with other business processes, such as those established for the management of the environment, quality, business continuity, risk, financial or human resources.

MMEC MANNESMANN LLC plans actions to

- Address these risks and opportunities
- Address legal requirements and other requirements
- Prepare for and respond to emergency situations

6.2 Objectives, Targets and Programmes

Top Management ensures that objectives, including those needed to meet requirements for the provided service are established, implemented and maintained at relevant functions and levels within MMEC MANNESMANN LLC. The objectives are measurable and consistent with the policy, including the commitments to prevention of pollution, to compliance with applicable legal requirements and with other requirements to which the organization subscribes, and to continual improvement.



A programme shall also be established, implemented and maintained for achieving the objectives which includes the designation of responsibility and authority for achieving objectives at relevant functions and levels of the organization and, the means and time-frame by which the objectives are to be achieved.

All departmental/sectional heads/related project managers are responsible to establish the objectives in close coordination with their departmental staff and get it approved by the Top Management. All objectives are properly planned in relation to the action to be taken, time frame, etc.

Management Representative (MR) is responsible to periodically monitor the progress with the departmental heads / Project Manager and provides feedback to top management / MD.

6.3 Planning of changes

When the organization determines a need for changes to the HSE Management System, top management takes responsibility to carry them out in a planned manner.

Top management plan changes to the HSEMS considering the purpose of the changes and potential consequences, integrity of the HSEMS, and allocation or relocation of responsibilities and authorities.

7. SUPPORT

7.1 Resources

Top management of MMEC MANNESMANN LLC is overall responsible for the implementation HSEMS. For the project specific roles, responsibilities, authorities & accountabilities refer to HSE Plans. Top Management has appointed a Management Representative, (from the concerned section/department) he is responsible for:

- Ensuring that the HSEMS is established, implemented, and maintained in accordance with ISO 14001:2015 and ISO 45001:2018 Standards.
- Ensuring that reports on the performance of HSEMS are presented to top management for review during the management review meetings and used as a basis for improvement of the HSEMS.

Resources included human resources, natural resources, infrastructure, technology, and financial resources. And human resources include specialized skills and knowledge. Infrastructure resources included the organization's buildings, equipment, underground tanks and drainage system.

7.2 Competence

MMEC MANNESMANN LLC has ensured by that employees under its control performing tasks are competent based on appropriate education, training or experience, and shall retain associated records. Who affect its HSE-performance including persons,

- Whose work has the potential to cause a significant environmental impact & Risks
- Who are assigned responsibilities for the HSEMS including those who:
 - Determine and evaluate environmental impacts or compliance obligations.



- Determine & evaluate hazard identification & risk assessment
- Accident investigation reports
- contribute to the achievement of an HSE- objective
- respond to emergency situations
- Perform internal audits
- Perform evaluations of compliance

Reference Document: HSE Training Procedure

7.3 Awareness

MMEC MANNESMANN LLC provides training for all employees in the skills and knowledge required to carry out their duties safely, efficiently and to the desired standard.

MMEC MANNESMANN LLC ensures that persons doing work under the organization's control are aware of:

- a) The QHSE policy
- b) Relevant HSE objectives
- c) Their contribution to the effectiveness of the HSE management system, including the benefits of Improved performance
- d) The implications of not conforming to the HSE management system requirements
- e) The significant environmental aspects
- f) hazards, OH&S risks and actions determined that are relevant to them;
- g) the ability to remove themselves from work situations that they consider present an imminent and danger to their life or health, as well as the arrangements for protecting them from undue consequences for doing so.

7.4 Communications

7.4.1 General

Top management realizes the usefulness of internal and external communication process to help the organization achieve the HSE objectives and participation of employees in best practices.

7.4.2 Internal Communication

Effective internal communication system is established throughout the organization through:

1. Notice board
2. Internal Memos
3. Intercom facility- for oral communication



4. E mail
5. Display of QHSE policy and objectives
6. Circulars
7. Monitoring and Measurement Reports – Trend Charts, Histograms, Monthly reports, etc.
8. Audit schedules
9. Management Reviews / minutes of meetings
10. Internal training activities.

7.4.3 External communication

MMEC MANNESMANN LLC have procedure in place for receiving, documenting, and responding to relevant communications from external interested parties, where appropriate. It includes the process for communicating with contractors and other visitors to the workplace.

In addition to communicating about specific OHS requirements relating to on-site and off-site activities, MMEC MANNESMANN LLC taken into account when communicating with external providers, particularly contractors:

- Information about a contractor’s OHS management system;
- Legal and other requirements that impact on the method or extent of communication;
- Previous OHS performance and history of notifiable incidents;
- The use of multiple contractors at the workplace;
- Emergency response;
- The need for alignment of the contractor’s OHS practices with those of the organization and other contractors at the workplace;
- The need for additional consultation and/or contractual provisions relating to high-risk tasks;
- Reporting of OHS performance, incidents, nonconformities and corrective actions;
- Arrangements for regular communications.

For visitors such as delivery companies, clients, members of the general public and product and service provider specific OHS information are communicated as follows:

- OHS requirements relevant to their visit;
- Evacuation procedures and responses to alarms;
- Traffic controls;
- Access controls and escort function;
- Details relating to the wearing of personal protective equipment (PPE).

External communication processes often include the identification of designated contact personnel from within the organization. This allows for appropriate information to be communicated in a timely and consistent manner. This can be especially important in



emergency situations where regular updates are required to be delivered in a clear and unambiguous manner.

7.5 Documented Information

7.5.1 General

Documentation includes the following:

- QHSE Policy
- HSE Objectives
- HSE Manual
- Procedures
- Technical documents / procedures to ensure the effective planning, operation and control of its processes, safety standards
- Records

7.5.2 Creating and updating

The top management of MMEC MANNESMANN LLC determined some criteria for creating and updating the documented information.

For the identification and description documented information, it decided to include a title, date and reference number.

SN	PUPOSE	ACTION/DETAILS
1	Identification and description	A title, date and reference number
2	Format	English
3	Media	Paper and Electronic
4	Suitability and adequacy	Review - By the HSE Manager Approval- MANAGING DIRECTOR

7.5.3 Control of documented information

The top management of MMEC MANNESMANN LLC determined to control the documented information required by the quality management system and by this International Standard. To ensure that documented information of internal and external origin determined by MMEC MANNESMANN LLC to be necessary for the planning and operation of the quality management system are identified and their distribution controlled, and MMEC MANNESMANN LLC has established a procedure for controlling documents used in its quality management system. This control ensures that:

- a) Distribution, access, retrieval and use;
- b) Storage and preservation, including preservation of legibility;
- c) Control of changes (e.g. version control);
- d) Retention and disposition.

8. OPERATION

8.1 Operational Planning and Control

8.1.1 General

MMEC MANNESMANN LLC is identified possible OHS hazards, MMEC MANNESMANN LLC implemented the operational controls that are necessary to manage the associated risks and comply with applicable OHS legal requirements.

Operational planning and control of the processes are established and implemented to enhance occupational health and safety, by eliminating hazards or, if not practicable, by reducing the OHS risks to levels as low as reasonably practicable for all relevant operational areas and activities.

The operational controls selected are maintained and evaluated periodically for their continuing effectiveness.

Operational control of processes includes:

- Use of procedures, work instructions, process maps and systems of work
- Monitoring key characteristics and stipulated operating criteria
- Ensuring the competence of workers
- Establishing preventive or predictive maintenance and inspection programmes
- Developing specifications for the procurement of goods and services
- Applying controls related to contractors and other visitors to the workplace
- Ensuring compliance with legal and other requirements or manufacturers' instructions for equipment
- Applying engineering and administrative controls
- Adapting work to workers by defining or re-defining how the work is organized, processes and working environments or by adopting an ergonomic approach when designing new, or modifying workplaces, equipment, etc.

When MMEC MANNESMANN LLC planning and developing operational controls, priority has given to controls with higher reliability in preventing work-related injury and ill health.

Planning includes, but is not limited to those for:

- Consultation and participation of workers
- Hazard identification and risk and opportunity assessment
- Determination of, and compliance with, legal and other requirements



- Planning, implementing, and maintaining OH&S objectives
- Training
- Communication
- Control of documented information
- Management of change
- Procurement
- Contractor management
- Outsourcing
- Emergency preparedness and response
- Monitoring, measurement, analysis and performance evaluation
- Internal audits
- Management review
- Incident investigation
- Nonconformity and corrective action

MMEC MANNESMANN LLC coordinates with the relevant parts of its OHS management system with those of any other organization with which MMEC MANNESMANN LLC shares its workplace.

MMEC MANNESMANN LLC maintaining and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned.

8.1.2 Eliminating Hazards and Reducing OH&S Risks

MMEC MANNESMANN LLC developed the hierarchy of control measures for the elimination of hazards and the reduction of OHS risks. The hierarchy of controls provides a structured approach to eliminating hazards and reducing or controlling OHS risks. This approach involves prioritizing control actions in a sequential manner. Each control is considered less effective than the one above it. It is customary to combine several controls to effectively reduce the OHS risks to a level that is as low as reasonably practicable.

MMEC MANNESMANN LLC follows below "hierarchy of control" for the elimination of hazards and reduction of OH&S risks:

- a) Eliminate the hazard
- b) Substitute with less hazardous processes, operations, materials, or equipment
- c) Use engineering controls and reorganization of work
- d) Use administrative controls, including training
- e) Use adequate personal protective equipment.

In applying the hierarchy of controls, MMEC MANNESMANN LLC is considering the relative costs, risk-reduction benefits, and reliability of the available options.



8.1.3 Management of Change

MMEC MANNESMANN LLC established & implemented the Procedure for Management of Change to control the planned temporary and permanent changes that influence its OHS performance such as:

- New products, processes, or services
- Changes to work locations, working conditions, processes, procedures, equipment, or the company's organizational structure
- Changes to applicable legal and other requirements
- Changes in knowledge or information concerning hazards and associated risks
- Developments in knowledge and technology

MMEC MANNESMANN LLC controls both temporary and permanent changes, to review the consequences of unintended changes and, where applicable, to take action to mitigate any adverse effects that might arise as a result of the occurrence of change.

8.1.4 Procurement

8.1.5 General

MMEC MANNESMANN LLC established, implemented, and maintained a procedure to control the procurement of products and services to ensure their conformity to its OHS management system.

Procurement processes is used to control potential hazards and reduce OHS risks associated with the purchase and introduction of products, hazardous chemicals, raw materials, equipment, and ancillary services into the workplace. The procedure also addresses the need for consultation and communication on the procurement process with interested parties such as workers, contractors, and visitors.

MMEC MANNESMANN LLC ensures that purchases are safe for use by workers by confirming that:

- Equipment is supplied in accordance with a technical specification such as CE-marking and, where appropriate, is tested to ensure that it functions as intended
- Equipment is supplied in accordance with legal requirements
- Where appropriate, risk assessments are carried out in advance of the use of the equipment
- Installations are commissioned to ensure that they function as designed
- Materials are supplied in accordance with technical specifications
- Usage requirements, precautions or other protective measure are communicated and made available to workers, contractors and others who could be adversely affected.

8.1.6 Contractors

MMEC MANNESMANN LLC co-ordinates its procurement process with its contractors, to identify hazards and to assess and control the OHS risks arising from:



- Contractors' activities and operations that impact or have the potential to impact the MMEC MANNESMANN LLC
- The MMEC MANNESMANN LLC's activities and operations that impact or have the potential to impact contractors' workers
- Contractors' activities and operations that impact or have the potential to impact other interested parties in the workplace such as visitors or the public.

MMEC MANNESMANN LLC ensures that the requirements of its OHS management system are met by contractors and their workers. MMEC MANNESMANN LLC's procurement procedure defines and applies occupational health and safety criteria for the selection of contractors & includes the occupational health and safety criteria for the selection of contractors in the contractual documents.

8.1.7 Outsourcing

MMEC MANNESMANN LLC established appropriate controls both to ensure that the external provider understands what is required of it and to give itself assurance that these are being pursued in a responsible way.

MMEC MANNESMANN LLC verify that its outsourcing arrangements are compliant with legal requirements and are consistent with achieving the intended outcomes of the OHS management system.

The type and degree of control to be applied to outsourced functions and processes are defined within the OHS management system and should be based on criteria such as:

- The ability of the external organization to meet the MMEC MANNESMANN LLC's OHS management system requirements;
- The technical competence of the organization to identify hazards, assess risks, determine appropriate controls and understand its obligations vis a vis OHS legislation
- The potential effect the outsourced processes may have on the MMEC MANNESMANN LLC's ability to achieve the intended outcomes of its OHSMS;
- The extent to which the outsourced process or function is shared
- The capability of the organization to achieve the necessary controls through the application of its procurement process
- Opportunities for improvement.

Controls includes contractual requirements, training, inspections, and risk assessments.

8.2 Emergency preparedness

MMEC MANNESMANN LLC has established, implemented and maintained a procedure to identify potential emergency situations and potential accidents and how to respond to such emergency situations.

The company will respond to actual emergency situations and accidents and prevent or mitigate associated adverse effect.

The procedure will be periodically reviewed and, where necessary, revise it, in particular, after the occurrence of accidents or emergency situations.



Reference Document: Emergency Preparedness Procedure

9. PERFORMANCE EVALUATION

9.1 Monitoring, measurement, analysis, and evaluation

9.1.1 General

MMEC MANNESMANN LLC implemented the procedure to monitor and measure the following to determine the performance of the OHSMS and evaluate its effectiveness:

- The extent to which legal and other requirements are fulfilled including, where applicable, all applicable OH&S legislation, collective agreements, standards and codes and insurance requirements
- Characteristics of activities and operations related to the identified hazards, risks and opportunities
- Progress in the achievement of the organization's OH&S objectives
- Effectiveness of operational and other controls.

MMEC MANNESMANN LLC determined appropriate methods for monitoring, measurement, analysis and performance evaluation in order to ensure valid results, decide when the monitoring and measurement will be performed and when the results from monitoring and measurement will be analyzed, evaluated and communicated.

MMEC MANNESMANN LLC ensured that monitoring and measurement equipment is calibrated or verified and that it is correctly used and maintained.

Insofar as measuring and monitoring are concerned, MMEC MANNESMANN LLC uses both reactive and proactive measures of performance but should mainly focus on proactive measures to drive OHS performance improvement.

Proactive measures include:

- Assessment of compliance with legal and other requirements
- Evaluation of the effectiveness of OHS training
- Use of worker surveys to evaluate OHS culture and related worker satisfaction
- Completion of statutory and other inspection schedules
- The extent to which programmes have been implemented
- The effectiveness of the worker consultation and participation process
- Use of health screening.

Reactive measures include:

- Occurrence and rates of notifiable accidents and dangerous occurrences
- Lost time incident rates
- Monitoring of ill health



- Actions required following assessments by regulatory bodies such as the HSA/HSE.

MMEC MANNESMANN LLC retained appropriate documented information as evidence of the results of monitoring, measurement, analysis, and evaluation and of the maintenance, calibration or verification of measuring instruments.

9.1.2 Evaluation of compliance

MMEC MANNESMANN LLC established, implemented and maintained a procedure for evaluating compliance with legal requirements and other requirements (6.1.3).

MMEC MANNESMANN LLC is

- Determined the frequency and method for the evaluation of compliance
- Evaluating compliance and take action if needed
- Maintaining knowledge and understanding of its compliance status with legal requirements and other requirements
- Retaining documented information of the compliance evaluation results.

9.2 Internal Audit

MMEC MANNESMANN LLC conducts internal audits at planned intervals to determine whether the HSEMS conforms to the planned arrangements to the requirements of ISO 14001:2015 and ISO 45001:2018 Standards and to the HSEMS requirements established by MMEC MANNESMANN LLC, and is effectively implemented and maintained.

Audits are planned, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits.

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

A procedure is established, documented, implemented and maintained to plan and conduct audits, report results and maintain records.

The management responsible for the area being audited ensures that actions are taken without undue delay to eliminate detected non-conformities and their causes. Follow-up activities include the verification of the actions taken and the reporting of verification results.

According to the policy of MMEC MANNESMANN LLC the internal audits may be conducted by a third party (consulting firm) based on a mutual agreement of assessment and according to specified conditions.

Reference Document: Internal Audit Procedure

9.3 Management Review

MMEC MANNESMANN LLC has established, documented, and maintains Procedure for Management Review. This procedure details the methodology adopted at MMEC MANNESMANN LLC for the review of Management System, at planned intervals, to ensure its continuing suitability, adequacy, and effectiveness. Reviews shall include assessing opportunities for



improvement and the need for changes to the Management System, including the EMS and OH&S policies and objectives. Records of the management reviews are retained.

Input to management reviews includes among other requirements:

- Results of internal audits and evaluations of compliance with applicable legal requirements and with other requirements to which MMEC MANNESMANN LLC subscribes.
- The results of participation and consultation.
- Relevant communication(s) from external interested parties, including complaints.
- The MS performance of the organization.
- The extent to which MS objectives have been met.
- Status of incident investigations, corrective actions and preventive actions.
- Follow-up actions from previous management reviews.
- changing circumstances, including developments in legal and other requirements related management system and
- Recommendations for improvement.

The output from management reviews are consistent with MMEC MANNESMANN LLC commitment to continual improvement and includes any decisions and actions related to possible changes to:

- Conclusions on the suitability, adequacy, and effectiveness of the system
- Continual improvement opportunities
- Changes to the environmental management system, including resources
- Actions relating to objectives not achieved
- Implications for the strategic direction of the organization.

Relevant outputs from management review are made available for communication and consultation.



10. IMPROVEMENT

10.1 General

MMEC MANNESMANN LLC's HSE System requires that prompt and effective corrective action is taken in all cases where product and service, process or system related nonconformance is found.

Non-conformities discovered are recorded and reported to the respective department's manager. The procedure ensures that the reasons for recurrence of non-conformity are thoroughly studied to determine the root cause. Results of such investigation are recorded.

The departmental manager thereupon implements the corrective action that is commensurate with the magnitude of the problem and the risks encountered. HSE Management Representative monitors the implementation of corrective actions taken is recorded in appropriate system documents.

The procedures also require that available information be studied in order to detect, analyze and eliminate potential causes of non-conformities. The procedure determines the steps needed to deal with problems requiring corrective action.

Personnel are encouraged to indicate the areas where potential non-conformities may occur and report such situations to HSE Management Representative. Any suggestions on possible improvements of the HSE System are also welcomed from all staff.

10.2 Incident, Non conformity and Corrective Action

MMEC MANNESMANN LLC has established, implemented and maintains a procedure, including reporting, investigating and taking action, to determine and manage incidents and nonconformities.

MMEC MANNESMANN LLC takes the following actions if incident or nonconformity occurs

- react in a timely manner to the incident or nonconformity and, as applicable
- take action to control and correct it
- deal with the consequences

MMEC MANNESMANN LLC evaluates, with the participation of workers and the involvement of other relevant interested parties, the need for corrective action to eliminate the root cause of the incident or nonconformity, in order that it does not recur or occur elsewhere, by:

- investigating the incident or reviewing the nonconformity
- determining the cause(s) of the incident or nonconformity
- determining if similar incidents have occurred, if nonconformities exist, or if they could potentially occur

The procedure established by MMEC MANNESMANN LLC is to

- review existing assessments of OH&S risks and other risks, as appropriate



- determine and implement any action needed, including corrective action, in accordance with the hierarchy of controls and the management of change
- assess OH&S risks that relate to new or changed hazards, prior to taking action
- review the effectiveness of any action taken, including corrective action
- make changes to the HSE management system, if necessary

Reference Document: Incident Investigation Procedure, Control of Non-conformity and Corrective Action

10.3 Continual Improvement

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

- enhancing HSE performance
- improving products and services to meet requirements as well as to address future needs and expectations
- promoting a culture that supports a HSE management system
- promoting the participation of workers in implementing actions for the continual improvement of the HSE management system
- communicating the relevant results of continual improvement to workers, and, where they exist, workers' representatives
- maintaining and retaining documented information as evidence of continual improvement
- Audit results
- Analysis and evaluation of data
- Effectiveness of Corrective actions
- Results of management review

11. RELATED DOCUMENTS

11.1 MMEC ORGANIZATION CHART



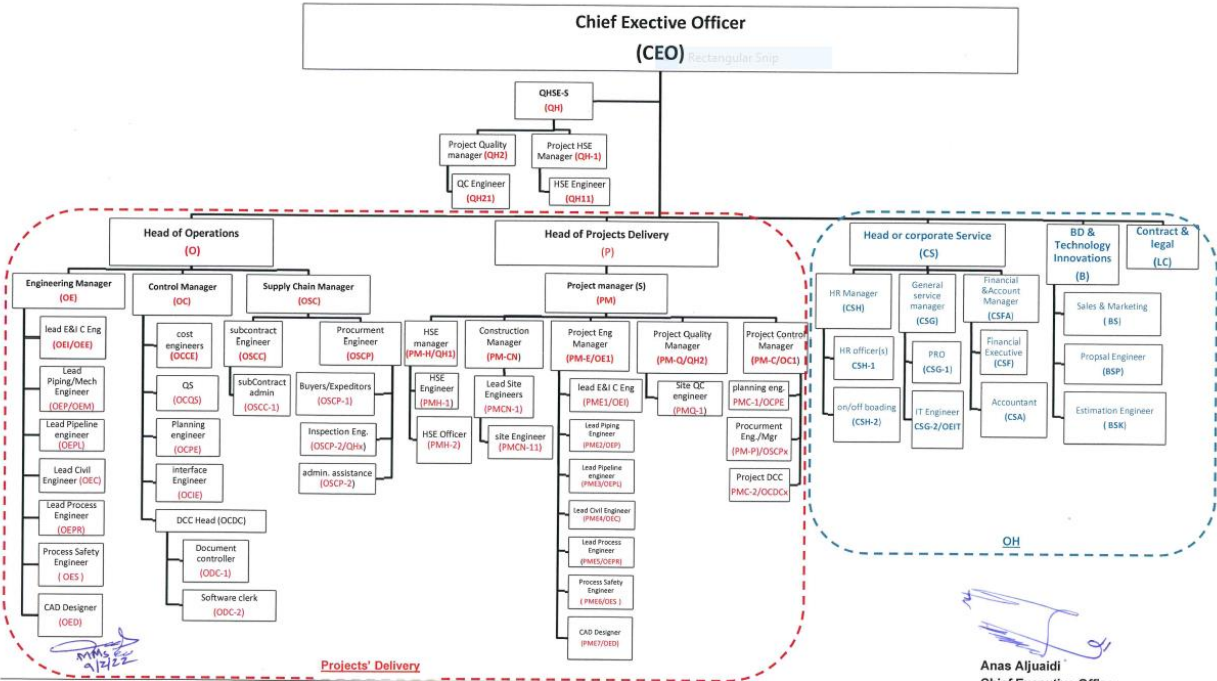
MMEC MANNESMANN ORGANIZATION CHART

Project No.	Unit	Type	Disc.	Iss.	Issue Date	Rev.
00000	0000	ORG	AUH	001	08.02.22	2

MMEC MANNESMANN LLC Organizational Chart (External)

MMEC MANNESMANN
develop. design. deliver.

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