

# HEALTH, SAFETY AND ENVIRONMENT MANUAL

PROMATEK  
GLOBAL  
PROJECTS  
LIMITED

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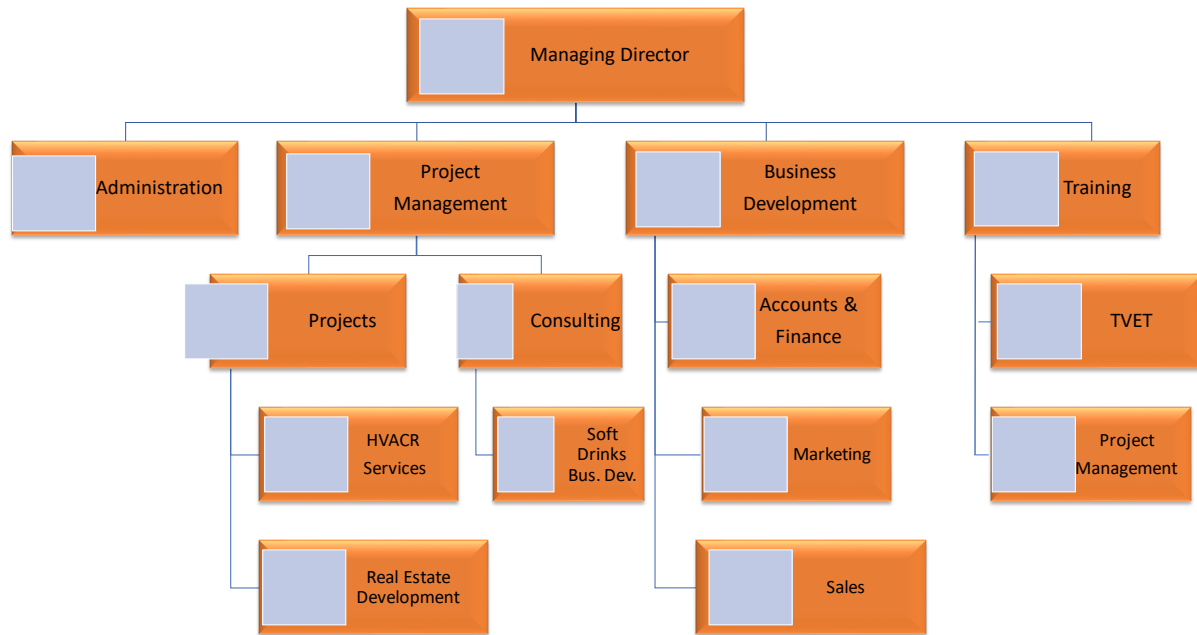
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# 1. INTRODUCTION: PROMATEK GLOBAL PROJECTS LIMITED

## 1.1. ORGANISATIONAL CHART & COMPANY SERVICES

This organization chart defines the reporting relationships within Promatek Global Projects Limited.



## 1.2. COMPANY PROFILE

**Promatek Global Projects Limited (PGP)** is a Project Management Consulting and Industrial Engineering Services Company incorporated in Nigeria on the 15<sup>th</sup> day of October 2007 with Incorporation Number RC 713242.

Promatek provides services in:

- Heating, Ventilation, Air-Conditioning, and Refrigeration (HVAC+R) Systems Services - Design, Procurement, Installation, Commissioning, Training, and Aftersales Services.
- Project Management Consulting Services – Food & Beverage Industries Start-up Advisory, Facilities Construction & Upgrade, Equipment Installation & Maintenance and Project Management Training.

### 1.3. OBJECTIVES

**Promatek Global Projects Limited** is a responsible corporate citizen and an operating company which recognizes the hazardous nature of its operations, and the adverse consequences of its failure to observe, check and control or completely eliminate the acts and conditions that could result in accidents or incidents. The corporate policy statements are duly endorsed by the directors of the company and signed by the CEO.

Having considered the purpose and context of our organization, the management of **Promatek Global Projects Limited**, through an Integrated Management System that meets internationally recognized standards for Quality, Food Safety, Environment and Occupational Health and Safety is committed to:

- Protecting the environment and preventing pollution in all areas of our environmental impact.
- Preventing injuries and ill health of all our employees and those affected by our operations.
- Fulfilling all legal and other compliance obligations for the Integrated Management System.
- Continually improving our systems to enhance performance through the use of Total Productive Management and other relevant tools. (Does the organization have a Total Productive Management TPM in place)
- Provide the framework for setting our Integrated Management System objectives.
- Fully understand, control and minimize the environmental impact of our operations, services, equipment, products, packages and fleet management activities.
- Are committed to the Health & Safety of all our employees, Contractors and visitors to our facilities by creating and maintaining a healthy and safe working environment for all, through a system of regular risk assessment and risk reduction measures.
- We shall provide the framework for establishing and reviewing key objectives and metrics for management systems, this shall be reviewed regularly for continuing suitability.
- This policy shall be communicated, understood to all within the organization, by site visitors, contractors and to all interested parties and all our staff shall be

involved in driving continual improvement and assume responsibility for daily implementation of the Health, Safety and Environment Standards.

Therefore, emphasis is on the need to conduct her business activities in such a manner, which ensures that the health and safety of her employees are safeguarded and minimum damage, is done to property and environment.

Management agrees, in principle that accidents are preventable, and every effort should be made to keep it at barest minimum since accidents are the leading cause of damage, loss and sometimes serious injury and death.

#### **1.4. POLICY STATEMENT**

Promatek Global Projects Limited places primary importance on Safety, Health and Environment (SHE). The Company believes that while risks do exist, accidents and injuries are preventable. Every employee/stakeholder has the responsibility to cultivate awareness for the safety of him/herself and others, both on and off the jobs. This awareness is fundamental to the well-being and the efficient operation of the Company's business. There is no business objective so important that it will be pursued at the sacrifice of safety.

Promatek Global Projects Limited recognizes its responsibility to educate its employees about Health Safety and Environment, to facilitate a healthy and safe workplace, and to provide safety rules and competent work directions based on experience. It is expected that all employees share the common goal with management that a job is well done only if it is done safely. The Promatek management believes that safety is a part of every operation and that operating safely assures job completion expending minimum time and costs and eliminates the risk or damage to personnel or property.

Every employee has the responsibility to prevent accident and injury by observing established work rules, by following the direction of supervisors, by practicing the principles taught in safety training, and by continuously providing ideas on how safety efforts might be improved. Safe conduct of operation is a condition of employment for all employees of Promatek Global Projects Limited. Promatek Global Projects Limited and its employees have the responsibility to comply with all Federal,

State and Local Government regulations related to Safety, Health and Environment programs.

### 1.5. POLICY PROCEDURE

This policy will always align with the Health, Safety and Environment procedures in existence at Promatek.

- i. This Manual will be distributed to Board of Directors, Management Staff, Junior Staff and new employees. The Manual applies to all employees.
- ii. In response to updated regulations, laws, personnel, and HSE best practices, the Manual is subject to change at any time with Board of Directors and Management approval. Updates will be brought to the immediate attention of the appropriate groups of employees.
- iii. This Manual is available to employees and an up to date copy will be kept at each program's administrative location. An electronic copy will also be available on the company website at <http://www.promatekng.com/hse-manual.pdf>.

### 1.6. SCOPE AND APPLICATION

**PROMATEK GLOBAL PROJECTS LIMITED** has laid down safety rules for its employees and has provided work equipment that are in good condition along with strict disciplinary measures for offenders. This policy is set out for every employee of the company to comply with its directives by being interested in his/her personnel safety. Employees are expected to report unsafe acts for prompt correction. It is mandatory for every member of staff to cooperate to make this policy a success. The provisions of this Policy also apply to sub-contractors that Promatek may engage from time to time.

To enforce this, management will ensure that:

- i. Staff that must work in any aspect of the company's projects are fully qualified for the task.

- ii. A registered Physician will physically examine every staff for physical fitness.
- iii. The crew is provided adequate personal protective equipment (PPE) with information on any potential hazards.
- iv. Staff are exposed to safety courses organized by reputable organizations and our clients.
- v. The company maintains a high and cost-effective standard for projects and operations.
- vi. Accidents are quickly reported when they occur, and that prompt investigation is undertaken.

This policy manual covers the management of all required Health, Safety and Environment related processes and information that is provided, used and concerns employees in the Company and in all cadres. The Project/Engineering Director will manage the Policy implementation.



## **2. ROLES AND RESPONSIBILITIES**

### **2.1. MANAGEMENT**

Under this policy, it is the duty of management to:

- a. Formulate safety objectives and targets and attend any forum convened for the furtherance of safety objectives
- b. Provide necessary funds for the procuring of appropriate personal protective devices
- c. Train employees especially by bringing in safety rules to the knowledge of everyone
- d. Provide a safe place of work, free from risk.
- e. Ensure that accidents are reported and that disciplinary measures are put into effect.

### **2.2. EMPLOYEES**

It is the duty of the employee to:

- a. Obey all safety conditions
- b. Report unsafe conditions
- c. Avoid personal injury
- d. Participate in safety training and meetings when the opportunity arises
- e. Know how to administer first-aid and the use of emergency equipment.

### **2.3. FOREMAN**

For the day-to-day activities in the workshop or active worksite, the foreman shall ensure that:

- a. Employees are briefed on the nature and associate hazards and means for avoiding the consequences
- b. Safe tools are provided for work
- c. Supervision for the quality of work is carried out
- d. New employees are instructed on safety rules and regulations
- e. Schematic drawings are preserved for future use.

## **2.4. SAFETY OFFICER**

The Safety Officer shall have the following duties:

- a. Requisition of all safety equipment
- b. Maintaining a record of stock and keep track of issuance.
- c. Identifying training needs
- d. Organizing formal in-house courses for all employees
- e. Liaises with other key personnel to develop safety procedure guides for the specific activities
- f. Attending management safety committees as ex-officio member
- g. Carrying out scheduled and unscheduled site inspections
- h. Advising on standards and latest development in the field
- i. Maintaining a record of all events and take a statistical view of all occurrences
- j. Liaises with client's safety function in matters of training and other requirements
- k. Monitoring the programme progress and pass the information to Management
- l. Liaise with governmental agents in regulatory matters as may be required.

## **2.5. SITE SUPERVISOR**

The Site Supervisor must ensure that:

- a. Site meetings are held regularly
- b. Accidents/near-misses are reported and discussed
- c. Minutes of meetings are taken by the Safety Officer and circulated to members
- d. Every employee is medically tested for task involving heights.

## **2.6. PROJECTS/ENGINEERING DIRECTOR**

The Projects and Engineering Director reviews this document alongside the Human Resources Manager for the assurance of a flawless document and thereafter carries out all processes for its approval by the Managing Director.

## **2.7. MANAGING DIRECTOR**

The Managing Director approves this Policy after due review with the Projects and Engineering Director.

### 3. SAFETY AT WORK

#### 3.1 SAFETY DURING PROJECT EXECUTION

The company will take adequate steps to ensure that reasonable and necessary precautions are taken to prevent any accident from occurring. In addition to acknowledging the strong safety commitment of our clients, we will strive to build corporate safety objectives similar to those of the client and wholly supported by our management.

The company shall therefore, in execution of works comply with the most stringent codes of practice prevailing in the Food & Beverage and any other relevant industry in addition to in-house regulations. The company will acquaint itself with requirements and implications of safety clauses in the contract for the execution of works. Safety requirements of the company are congruous with and inseparable from the safety interest of our client and all safety related documents from our client would be deemed to affect our personnel.

Irrespective of whether works are executed in our workshop or client's premises, our personnel will strive to:

- a. Maintain and keep work area tidy
- b. Wear hardhat, coverall and where necessary other relevant protective equipment
- c. Never carry out job without necessary permit or authorization from competent personnel preferably the client's representative on site
- d. Observe "**NO SMOKING**" sign in areas where smoking is prohibited.
- e. Not abuse safety equipment such as fire extinguishers, first-aid box and fuses. Whenever an extinguisher is discharged, it must be reported for action to be taken.
- f. Ensure that every staff of the company is conversant with the emergency action to be taken in the event of hearing fire alarm. For this reason, fire station bills should clearly state initiation and the responsible person to be contacted.
- g. Exhibit action in line with company agreed strategy for dealing with problems such as being first to discover fire.

- h. Endeavour to prevent accidents being an unwanted occurrence, which can cause injury, damage to equipment and have adverse effect to the environment.
- i. Be prepared to give factual information regarding its investigation if you are involved in an accident.

### **3.2 MOBILIZATION TO WORK SITE**

- a. Prior to going to work site, all participating workers will be addressed on the nature of the project, location and any special risk factors.
- b. Accommodation and welfare arrangements including medical and recreational facilities shall be communicated to the participating workers by the Project Engineer or Business Development Manager.
- c. Clients' and Promatek obligations checklist will be reviewed with the Site Engineer who will then disseminate to the workers before going to site.
- d. At the project site workers will dress up in the correct PPEs and receive both general client's plant and site safety inductions and fill the access control note at the gate.
- e. It will be a standard that tools and materials shall be moved to the worksite before work begins. Work permits shall be obtained and dully signed by the safety department. Also, RAMS (Risk Assessment and Method Statements) for the job shall be carefully communicated to the understanding of the workers by the Client's Safety Officer and Promatek's Safety Officer with delegation of roles and responsibilities

### **3.3 CODES OF WORK PRACTICE**

This area covers work plans, the use and protection system for tools, safety of personnel and environmental condition of worksite.

The aim of the company is to adequately protect its personnel from injuries occasioned by accidents. For this purpose, full personal protective equipment shall be issued to each staff. This must be worn on site. It is the policy of the company for experienced staff to teach apprentices work procedure and safety, human or material resources of the organization. Experienced staff will be trained in-house or opportunity afforded client to train all cadres of staff. During mobilization, only

equipment and materials certified by the client shall be deployed to site.

Housekeeping shall be maintained on a continuous basis. Demobilization shall include the removal of all assets and complete site cleaning before handing over to the client.

### 3.3.1 PLAN

- a. Scope of contract works shall be thoroughly discussed with the client
- b. Records of such discussions shall be properly kept for needed references to be made as may be required.
- c. Reporting relationship in the case of progress and of accidents shall be established.
- d. Safety/Site meetings shall be held regularly and the minutes of such meetings made available to the client's supervisor
- e. Be aware and become familiar with client's emergency procedures
- f. Use of the necessary work permits in the client's worksite
- g. Install hazards warning and safety notices as may be required at the site
- h. Tools used are maintained and properly stored in toolboxes. Defective tools shall be replaced with good ones.
- i. Power driven tools or appliances shall be maintained in accordance to manufacturers' instructions
- j. Any power-driven machinery approved by the client will be used for work.

### 3.3.2 SAFETY ANALYSIS

To ensure that safety considerations are not inferior to production hazards, the scope is broken into various milestones and each hazardous condition noted for study.

The Foreman shall after a job safety analysis:

- a. Correct all deficiencies in equipment
- b. Deploy the correct equipment
- c. Ensure that competent personnel are engaged
- d. Provide critical supervision
- e. Ensure that job analysis is mandatory for every job.

The nominated Safety Officer shall ensure that:

- a. Hazards are kept to a minimum
- b. Fire protection is maintained
- c. First aid facilities are relevant and available
- d. The job is continuously studied for hazards not realized during the analysis
- e. The proper Personal Protective Equipment is worn

### 3.3.3 EQUIPMENT INSPECTION

It is the policy of the company to provide safe equipment in good condition of repair and for this reason, equipment inspection will be continuous.

Equipment are inspected for:

- i. Electrical/Mechanical integrity
- ii. Fitness for purpose

### 3.3.4 REQUIREMENT OF PERMIT TO WORK

The permit to work system is a safe procedure designed to protect personnel who may be used to working in potentially hazardous situation. The following rules will apply in the implementation of this procedure:

- a. Only personnel covered by the permit will be allowed to enter the area concerned
- b. All personnel will be made aware of the situation and the measure to be taken.
- c. The area concerned will be clearly defined with cautionary notice boards posted at all access points.
- d. The right to enter and work will be limited in time and will be stated on the permit.
- e. Adequate and suitable protective clothing and equipment will be provided and used.
- f. All work permits will become invalid when the general alarm is sounded. All work must cease, equipment is shut down and no work resumes until the alarm is over and the permit has been re-endorsed by the superintendent following further inspection of the work area.

- g. Where work is to be performed in an area controlled by a client, the client's work permit system will be used and strictly adhered to.

### 3.3.5 ENTRY INTO CONFINED PLACES

- a. All work involving entry into confined spaces will be performed under a permit to work
- b. Maintenance work on site may involve inspection, cleaning or repair of ammonia refrigeration systems. Lack of adequate ventilation means that the atmosphere in the space may not be adequate to support life because oxygen in the air has been displaced by ammonia.
- c. Work activities, such as welding may produce toxic gases or fumes. These fags may also present a fire or explosion hazards.
- d. No one should enter such places without breathing equipment until the atmosphere in the place has been tested and proven safe.
- e. Anyone who enters an enclosed space where there is toxic gas or low concentration of oxygen will collapse and become unconscious very quickly and others, who may attempt to enter to effect rescue without breathing apparatus, will be similarly affected.
- f. No attempt should be made to rescue an unconscious person in an enclosed space before reporting circumstances and seeking help.

## **4. SAFETY AT POWER AND ELECTRICAL SYSTEMS**

### **4.1 ELECTRICAL SAFETY**

- 4.1.1 It is the duty of all persons who may be concerned with the operations of power systems and work on electrical equipment to make themselves thoroughly conversant with Safety Rules governing any work, including operations they may have to undertake on such systems and equipment. Ignorance of the rule should not be accepted as an excuse for neglect of duty.
- 4.1.2 Every person should report immediately, take the necessary measures to eliminate such dangerous or unsafe conditions.
- 4.1.3 Management should immediately take the necessary measures to eliminate such dangerous or unsafe conditions.

### **4.2 RESPONSIBILITY FOR OPERATION IN POWER SYSTEMS**

The responsibility for switching either on or/and off rests with the competent person for the associated equipment.

- 4.2.1 The starting and stopping of electric motors, the synchronizing of generators etc., is consequently the responsibility of the authorized persons.
- 4.2.2 In works involving switching on power systems (except the service lines), such power systems should be under the control of authorized persons. The authorization for switching, especially where back feed is possible, should be limited to authorized persons only, who by definition have the proper electrical background. The responsibility for isolating and/or earthing electrical equipment rests with the electrical department.

### **4.3 PERMIT TO WORK ON ELECTRICAL EQUIPMENT PROCEDURE**

- 4.3.1 The permit to work on electrical equipment should be given personally to the person in charge of the work to be carried out. From this, he knows exactly which electrical equipment is dead; isolated from all live conductors; discharged; connected to earth; or safe to work with. The authorized person should ensure by himself that all required conditions are fulfilled.



- 4.3.2 The permit is issued directly to the person in charge of the work. The authorizing person should sign the permit and its duplicate only after reading and being satisfied with its contents.
- 4.3.3 The person in charge to whom the permit is issued should be a competent person who should always retain the permit in his possession whilst work is being carried out.
- 4.3.4 When work on equipment for which a permit has been issued is suspended or completed, the person in charge should sign the clearance section of the permit and return it to the authorizing persons who should cancel it after removing earthing connections, caution notices etc., and declare the apparatus fit for service.

#### **4.4 SAFETY TRAINING**

Training is a vital aspect of personnel development and it is an ongoing exercise to get all levels of employees trained. The level of training will depend on the type of work and the level of supervision required. The aim is to acquaint the workers with the work processes and the necessary skills and behavior required of him.

Apart from Safety Tool Box briefings and weekly safety meetings there will be other communication systems used to get safety message across to staff. Prior to moving to worksite, the employee is briefed on:

- 4.4.1 How to use life-jacket; where the job is located in a marine environment
- 4.4.2 How to use breathing apparatus
- 4.4.3 How to use portable fire extinguishers
- 4.4.4 The use of permit-to-work system
- 4.4.5 How to get first aid attention
- 4.4.6 There is also induction on site arranged to acquaint employees with the characteristics of the work environment and a brief of the general activity. This area should be the result of Hazard Analysis of the job activity.
- 4.4.7 The induction should mention the type and nature of hazards to be expected and means to avert future occurrence.
- 4.4.8 Works involving areas where hazardous atmosphere of inflammable type, may be present; smoking must be prohibited.

4.4.9 Company's personnel are advised to seek out hazard that are not entered in the permit and ensure that adequate precautionary measures are taken.

4.4.10 Any worker found to be under the influence of alcohol or drugs would be summarily dismissed.

4.4.11 To promote personal hygiene at all times, employees are advised to restrict eating, drinking of soft drinks and smoking to areas clearly designated for them.

#### **4.5 GENERAL MANUAL HANDLING ACTIVITIES**

4.5.1 By its nature, Industrial Engineering services work is varied. Therefore, the manual handling of materials and equipment will be required in many situations too numerous to be assessed individually. This varied nature of work eliminates the possibility of repetitive lifting operations, which could lead to a repetitive strain injury.

4.5.2 Promatek is committed to eliminating hazardous manual handling by mechanizing lifts where reasonably practicable.

4.5.3 The Company will make adequate provision of mechanical lifting aids such as cranes, lift trucks, pallet trucks, sack barrows, hoists and chain blocks to reduce the need for manual handling.

4.5.4 Site installation work is always planned so that mobile cranes, sack barrows, pallet trucks, skates, jacks, chain blocks, etc., are available. The type of mechanical aid provided will be appropriate for the type of load and will again reduce the need for manual handling.

4.5.5 Mechanical aids cannot eliminate the need for manual handling. Therefore, the control measures detailed in the specific RAMS (Risk Assessment and Methods Statement) will be required to reduce the risk of a manual handling injury to an acceptable level.

Additional specific manual handling assessments may be required for the following situations:

- a. When access limits the use of mechanical aids.
- b. When access limits personal movement.
- c. Repetitive lifts.

**Note: Specific Manual Handling assessments must be completed on the RAMS (Risk Assessment and Methods Statement) for specific project.**

#### **4.6 SAFETY IN TRANSPORTATION**

This company does a lot of transportation of both employees and materials. Road transportation methods are mainly used. The safety precautions required in this case are as follows:

- 4.6.1 Drivers must have valid driving license and permit to drive company vehicle.
- 4.6.2 Drivers with poor eyesight or unfit in any other way should not be allowed to drive
- 4.6.3 Vehicles must be in good condition. Do not “MANAGE” it. Routine maintenance schedules must be complied with. All faults should be rectified before vehicle is put on the road.
- 4.6.4 The driver and front seat passenger must use seat belts. **This applies to back seat passengers as well, where seat belts are available.**
- 4.6.5 Do not drive too fast. Adjust your speed to suit road conditions; weather, light and traffic, slippery and wet surface, potholes, bumps, hills, bends etc. require slow speed. In situations where you cannot see far enough, park and wait until visibility improves.
- 4.6.6 Do not use company vehicle for unauthorized business
- 4.6.7 Employees should not ride on open vehicles or those meant for goods.
- 4.6.8 Speed limit in company premises and along the highway must be obeyed. All regulations of the Highway Code must be obeyed.

#### **4.7 SCAFFOLDING INSPECTION/ERECTION**

Only persons experienced and knowledgeable in the erection of scaffolding should be allowed to erect any scaffolding structures. They should be fully aware of the purpose of the scaffold and the load, which are to be put on it.

All materials should be inspected by a competent person before use to ensure that they are in good condition and safe to use.

4.7.1 Scaffold board should be selected timber and unpainted except on the end.

Any boards that are split, broken or weakened by nuts should not be used for scaffolding.

4.7.2 All couple and fitting should be maintained in an oiled condition. Any one in a damaged condition should not be used. Only double (right angle type) or swivel couplers should always be sufficient for offshore environment. There should always be sufficient materials available to do the job correctly and no attempt should be made to skimp on materials. People should avoid working underneath scaffolding when men are working on them unless it is absolutely necessary.

#### 4.7.3 **For Erection of Scaffoldings:**

- a. Because of the differences and complexities involved with certain projects, it is important that scaffolding requirements are considered by engineering at the planning of the project to ascertain the soundness of the scaffolding for the job.
- b. No part of the structure must be used to support scaffolding unless it is strong enough to do so.
- c. All scaffolding must be correctly braced to avoid distortion and all bracing connections should be made with load bearing couplers, (right angle or swivel types).
- d. Scaffolding should never be overloaded or used for a purpose other than that for which it was designed.
- e. Scaffold materials shall be inspected and certified satisfactory for use by the safety team. Erection of industrial scaffold up to **a height of 5m** shall be carried out by a certified scaffolding company. After erection, the Scaffold Certification and approval for use shall be conducted by the Scaffold Inspector and Site HSE Supervisor. Recommended modifications if required shall be implemented to specification and a Scaff-Tag will be installed in place.

## 4.8 GALVANIZED DUCT WORK INSTALLATION

### 4.8.1 **Installation of Brackets**

- a. Barriers and signage are to be erected around the work area.

- b. Operatives will transport duct materials to the work area and will store within barriered-off area.
- c. Brackets are to be fitted as per specifications and requirements based on the type of ductwork being installed.
- d. Pre-cut lengths of Unistrut will be secured to fixed steelwork using the fixing bolts.
- e. Fixing bolts are to be tightened.
- f. All bracket arrangements will be installed to specification.

#### 4.8.2 Installation of Galvanized Ductwork

- a. Operatives will follow Promatek SOPs for Installation of Brackets & Supports and Installation of Ductwork.
- b. Duct work will be lifted into position using genie hoist (Duct Lifter), or marine rope where manual lifting is unavoidable.
- c. Operatives will set up certified genie hoists under the installed brackets and outriggers are to be fully opened out.
- d. Operatives will lift the ductwork onto the genie hoist and secure into position on the forks of the hoist.
- e. Operatives on the scaffold platform will position themselves beside the area where duct work is to be positioned.
- f. An operative at ground level will hoist the ductwork to the required height.
- g. Operatives in the scaffold platform will remove the horizontal unistrut support channel and will direct the duct work on the hoist into the bracket support area.
- h. Operatives will then reinstate the unistrut support to the threaded rods under the duct.
- i. The duct will then be detached from the forks of the hoist and the hoist will be removed.
- j. Using hand tools operatives can then alter the height of the ductwork brackets.
- k. The methodology above will be adhered to when lifting duct sections into position.
- l. Duct sections when secured in position on brackets, will be connected and secured together using hand tools.

- m. A strict clean-as-you-go policy must be adhered to at all times.
- n. On completion of works area will be tidied and barriers & signage removed. All tools and materials will be removed from the work area.

#### **4.9 EXCAVATION**

This guidance covers the preparation and execution of excavation in Civil/Mechanical worksite.

- a. No excavation work takes place without required work permits. These should be signed by authorized component engineers (Civil and Electrical) stating that the area is safe with regard to electric cable (including telecommunications) drains and underground pipes.
- b. Before starting any excavation on a public road the fire/safety department shall be contacted and consulted to ensure traffic flow is not unduly disrupted, emergency access is not impaired and adequate warning lights are positioned during the hours of darkness.

#### **4.10 MACHINE TOOL OPERATION SAFE PRACTICE**

- 4.10.1 No person may be employed at a machine plant or equipment, unless he had been sufficiently trained in its operations, or unless he works under the supervision of a person who has a thorough knowledge of the operation, the danger arising in connection of the operation and the precaution to be observed.
- 4.10.2 Every person being trained as an operator must be fully and carefully instructed as to the danger arising in connection with such an operation and the precaution to be observed.
- 4.10.3 It is the duty of all employees supervising the operation of the machine plants and equipment, to be vigilant to check all dangerous operation practices being performed by persons under their control and to encourage the practice of all safety precautions such as the maintenance, and proper adjustment of all safety guards.
- 4.10.4 Machine operators should never wear rings, loose clothing, necklaces, long hair, bracelet, which could be caught up in the moving parts of a machine.

#### **4.11 BLASTING AND PAINTING**

Blasting is one of the hazardous activities normally performed in an industry. Sand, water, air/gas, steam or cleaning chemicals may be used. The danger here is that the air is contaminated with high concentration of rapidly moving abrasive particles or injurious liquid droplets.

Protection is achieved as follows:

- 4.11.1 Wear a suit where corrosive chemical and hazardous gases or mist are involved.
- 4.11.2 Eyepiece (window) and protective screen/shield should be strong enough to resist the impact of particles. In spray painting, there is the danger of the operator inhaling air-borne mist containing lead and chromium. Respiratory protection is needed. No worker should be allowed to paint without wearing a facemask. Painters should wear hand gloves and coverall to reduce contact of paint with the body. Solvent should not be used to wash or clean hands. Solvent removes the natural oils of the body and can cause dermatitis.

## 5. FIRE PREVENTION AND PROTECTION

### 5.1 GENERAL

The Safety Officer is required to ensure that plans are devised for action in the event of fire, major incident or any other emergency. The responsibility for implementing this rests with the Project Manager or the location sites supervisor. These plans must be communicated to staff by rehearsing the emergency procedures manuals and by regular drills. Fire-fighting training and formation of fire-fighting teams is part of the overall fire protection strategy.

The nominated Safety Officer to the Manager at each location shall immediately report all accidents and dangerous occurrences. The Manager of the location or supervisor will implement the procedure to ensure that all investigations take place and that action is taken to prevent a re-occurrence.

- 5.1.1 Fire is a serious hazard and all personnel must take precaution to reduce the risk of fire starting. All fires require a material, which will burn, a source of oxygen, which is usually air, and a source of heat to set the fire going. Fire prevention activities attempt to keep these three things separated so that fire cannot start. To reduce the risk of small fire starting, two important rules must be picked up and properly disposed of. This is especially important in the case of oily rags, which must be placed in closed metal containers since they can ignite spontaneously.
- 5.1.2 Smoking is not permitted in high-risk areas, which will be clearly marked. If you do smoke, make sure that matches and cigarette butts are properly extinguished in **sand buckets** before you discard them.
- 5.1.3 Activities which involve the use of flammable liquid are especially hazardous since the vapour can travel a considerable distance and find source of ignition (e.g. solvents for cleaning electrical equipment). The fire may then 'flash' back along the vapour track, setting fire to materials at the work place. If sufficient vapour is building up in an enclosed space, an explosion may result.
- 5.1.4 When flammable liquids or powders are being poured from one container into another, static electricity will build up, especially in dry weather and may



spark to earth (ground) setting fire to the material. The two containers should be kept firmly in contact during transfer operations and grounded electrically.

- 5.1.5 Pouring of flammable liquid produce a large amount of vapour. There is need for the supervisor to control this type of work so that it is not done at the same time as, for example, welding operations, being carried out in the immediate vicinity.
- 5.1.6 Welding, gas cutting and grinding operations spray sparks which can set fire to rubbish or other flammable materials. Always ensure that the area is cleared or damped down as appropriate before starting work (e.g. welding operations on one side of a bulkhead can set fire to materials on the other side).

## 5.2 PLAN

- 5.2.1 A safety manual is in place in our company to cover all aspects of the work done by us.
- 5.2.2 All staff shall at all times while on worksites, wear hardhat and safety shoes. In addition, there is the need for particular work operations to be evaluated from case to case.
- 5.2.3 All work operations are being analyzed for hazards and will be documented in the work procedures and methods manual.
- 5.2.4 All equipment engaged on sites shall be jointly inspected prior to mobilization
- 5.2.5 Adequate sign posting shall be displaced on site to increase safety awareness at all times.
- 5.2.6 Our Safety Officer shall continuously monitor all worksites and report on a daily basis to respective heads of project.
- 5.2.7 Our Management and Client's engineer shall meet daily to discuss safety matters. Records from these meeting shall form part of the daily report.
- 5.2.8 Any nominated client's engineer has the undisputed authority to close down any part of the work at any time he considers the work being executed to be a threat to any body's life.

### 5.3 OBJECTIVE

Our overall objective is accident prevention, which could otherwise result in pains, disabilities, damage to properties (plant and equipment) death as well as damage of the animal and plant life within the environment. **Promatek Global Projects**

Protection programs are designed to:

- 5.3.1 Sustain Management's commitment to Health, Safety and Environment protection.
- 5.3.2 Increase the level of awareness among all employees
- 5.3.3 Provide healthy and safe working conditions for all employees
- 5.3.4 Ensure that plants, equipment and small tools are safe to work with
- 5.3.5 Promote good house keeping
- 5.3.6 Conserve the plant and animal life within our environment; and
- 5.3.7 To ensure all employees of their safety at work.

### 5.4 ASSIGNMENT OF RESPONSIBILITIES

The overall and final responsibility for Health, Safety and Environment protection is that of the Managing Director with support from the Projects and Engineering Director.

#### 5.4.1 HEALTH

- a. The company is responsible for ensuring physical fitness at work. In this regard, rules and regulation are placed to guard against alcoholism and drug abuse. In addition, the company subscribes to the HMO (Health Management Organization) system where our workers have access to medical facilities all over the country.
- b. Where the HMO has no coverage, the company arranges with other health management providers for Emergency health intervention during project execution. This is always accomplished as part of the initial mobilization activities.

#### 5.4.2 INJURIES

The company also keeps a standard first-aid box on every job and ensures the site supervisor is professionally trained to administer it. Special efforts are also taken by the company to ensure that there is provision of health boarding environment and portable water supply for the work force.

#### **5.4.3 PROJECT SAFETY**

The individual assumption of responsibility for safety is of vital importance on our safety administration and this is frequently emphasized to all employees throughout the duration of any contract.

- a. Site Safety Officer: The company will nominate through the safety department of our client an approved competent Safety Officer to be resident on site throughout the duration of the contract. He will be responsible for advising the site management on safety policies, rules and regulations and also help to ensure that they are implemented.
- b. Site Supervisor: The supervisor will be responsible for applying work safety rules and procedures as advised by the Safety Officer.
- c. Employees: Every employee will be responsible for abiding by the Health and Safety rules as interpreted and enforced by the Safety Officer and take reasonable care of themselves and their work mate.

#### **5.4.4 PROGRAMMES**

The company shall employ only certified personnel on the various items of work in the contract. The company Safety Officer shall hold an orientation safety meeting with the entire work force, highlighting the scope of work, the foreseeable hazards and measures taken by the company to avert unfavorable occurrence. In addition, induction courses will be organized for every new employee as they are engaged.

- a. Review of work scope and the attendant hazard shall be part of the periodic instructional safety meeting to be held on site.
- b. A copy of the company's safety rules and regulations shall be provided to every employee for their personal reference and understanding

- c. Safety warning signs and stickers will be placed at appropriate locations to caution all employees on a daily basis on safety
- d. The company's Safety Officer shall undertake periodic site inspections and report his findings and or recommendations. The client shall be informed of such reports.
- e. All accident cases shall be promptly reported and investigated. This shall be a fact finding exercise and not to punish. The report shall be communicated to our client.
- f. The site shall be provided with a centralized standard first aid box to be manned by the nominated First-Aider.
- g. The site shall be provided with adequate portable fire extinguishers and every employee is expected to know their operational module
- h. All employees are to be provided with adequate and required protective equipment and ID Cards.
- i. All sub-contractor's facilities are to be inspected to ensure that the minimum safety requirements are met.
- j. Spark arrestors shall be fitted to vehicles working on the project site
- k. The site management shall keep necessary records and logbooks.
- l. All transport media shall be checked to ensure their safe condition before embarking on any journey
- m. Open back pick-ups shall not be used for personnel carriage
- n. All open back vessels shall be provided with guardrails
- o. All transport media shall be manned by qualified and competent operators and provided with appropriate safety gears including fire extinguishers; life jackets, warning signs etc.

## **5.5 CONTINGENCY PLAN OF ACTION IN EMERGENCY SITUATIONS**

The company maintains that safety is everybody's business. Thus, all reasonable measures are taken to prevent the occurrence of unwanted events, and to protect the Company's Safety Policy and operations guidelines, as propagated in our operations. However, despite all efforts to prevent the occurrence of unwanted events, accidents may still occur, in varying forms and magnitude.

While first aid and medical evacuation procedures are in place in our company's safety manual, some accidents may result in sudden change in the condition of either the human or material resource of an organization, which may disrupt normal operation, and result in severe damages. Such situations could be identified as crisis or emergency.

In order to avoid more damage resulting from confusion and stampede and to prevent a crisis situation from escalating, it is wise to identify specific emergencies or crisis situations for which the limits of human and material resources, and must aim at:

- a. Saving lives
- b. Minimizing pain and suffering
- c. Minimizing disruptions to normal operations
- d. Restoring normal operations

Emergency plan is also directed towards realizing maximum assistance at the shortest possible time and ensuring that all services likely to be involved or affected are informed within the shortest possible time. An orderly and effective response to the measure in the place is of vital importance for achieving desired results. To this end, despite the First Aid Facilities, our Company maintains a network of Hospitals within the Country through the HMO (Health Management Organization)'s facility, where workers could be rushed to in case of any emergency at any project site.

#### **5.5.1 RESCUE TEAM/COMMAND STRUCTURE**

The rescue team in an emergency shall include the following:

- a. The Manager
- b. The Site Supervisor
- c. The Site Safety Officer
- d. First-Aider, and
- e. The (General) Foreman

Other members of the rescue team shall include employees from the security and foreman units and as shall be requested and directed by the Site Supervisor

### **5.5.2 SPECIFIC CRISIS SITUATIONS/EMERGENCIES**

In our operations, the following emergency situations are envisaged:

- a. Serious injuries
- b. Fire disaster
- c. Severe injuries from lifting operations or falling from height
- d. Suffocation from toxic gases
- e. Serious frost bite
- f. Electric shock
- g. Road traffic accidents

### **5.5.3 MEDICAL EVACUATION (MEDEVAC):**

On Mechanical Emergency (e.g. serious injury)

- a. Give location and condition of patient
- b. State assistance required

### **5.5.4 FIRE EMERGENCY**

Fire is the greatest threat in the workplace. Employees should avoid smoking as much as possible. Smoking is allowed in designated locations only and should be done with the use of ashtray. Do not throw lit matches carelessly out of the window, doorways or into the waste basket.

#### **If you discover a fire:**

- a. Raise the alarm (shout Fire! Fire!! Fire!!!)
- b. Operate alarm system if possible
- c. Call the Fire Department
- d. Try to put off fire (do not risk your life)
- e. Assemble outside at a safe place for head count (**Muster Point**)

#### **If you hear the fire alarm:**

- a. Leave the room/worksite at once
- b. Follow the exit route

- c. Assemble at the Muster Point for roll call
- d. Do not re-enter the building/worksite for any reason

**In the event of collapse or serious injury, the person closest to the injured person should:**

- a. Ensure that the accident scene is safe, and that there is no further danger to him or herself, co-workers or the injured person
- b. Not move the injured person unless there is a high risk of further injury and that it is safe to do so.
- c. Keep calm and does not leave the injured worker unattended
- d. Contact the First Aid Attendant immediately to administer the first aid.
- e. Ensure that the Site Supervisor, Safety Officer, and Management are informed of the situation
- f. Serious cases will be referred to the Hospitals earlier identified for such situation.

**5.5.5 GOOD HOUSEKEEPING**

- a. Orderliness in the workplace promotes accident free operations. Everything has its place. Scraps, junk and useful or serviceable materials must never be stored or dumped together.
- b. Every item must be separated. Stacking materials haphazardly invites trouble. All stacking arrangement must be neat and orderly. Never leave spills of oil or water unattended. Mop it up as soon as discovered.
- c. Do not let telephone cables and flexible cords crisscross the workplace, room or alleyway. Lay them along designed routes.
- d. Do not leave office equipment switched on when you leave. Switch off before you leave.

## **6. CIVIL, MECHANICAL AND ELECTRICAL INSTALLATION WORK.**

### **6.1 ROAD WORK**

Work involving roadways presents hazards both to the road users and the working crew. Failure to warn the road users in advance on the part of the road works crew and failure to drive within the regulated speed limit on the part of road users causes serious conflicts and unwanted events.

The following procedures will be put in place of works:

- a. Seek clearance and permit to work. The permit should be accompanied by certificates for excavation for the period of closure or restricted use of the roadway.
- b. For busy roadways, publicize the works through the client's appropriate media stating alternative routes and period of restriction.

### **6.2 CIVIL, MECHANICAL AND ELECTRICAL INSTALLATION WORK**

- 6.2.1 Excavation shall have slopes such as to prevent earth movement and trenching shall be adequately braced or sheet piled to the normal requirement.
- 6.2.2 Scaffolding shall be designed to resist working load as well as load of the structure element it is intended for.
- 6.2.3 Scaffolds shall be firm and solid material
- 6.2.4 Scaffolds shall be designed and constructed to meet other client's specifications as contained in the contract document
- 6.2.5 All electrical instruments shall be well protected from water and adequate earthing shall apply.
- 6.2.6 All conductors shall be adequately insulated, and terminal point shall be properly connected.
- 6.2.7 Appropriate personal protective equipment shall be provided. So are portable fire extinguishers.
- 6.2.8 Good housekeeping shall be maintained.



6.2.9 Equipment and small tools shall be properly handled in safe toolboxes, cleaned, and maintained at the end of every day's job. (**Maintaining the the 5 S Concept**)

6.2.10 Permit to work/Hot permit must be renewed as the scope of work changes.

6.2.11 Work in hazardous area shall be carried out under strict supervision and close monitoring by the Safety Officer.

### 6.3 LOTO PROGRAMME

Taking equipment out of service for repairs and maintenance must follow the Log-out/Tag-out (LOTO) procedures for safety of the personnel. The Objective of a typical LOTO programme involves putting in place appropriate Lockout / Tagout procedures, which can be adapted to specific situations. These will include Locking Off Procedures, Tagout protocol and Permits to Work and finally Reactivation Procedures. The locking off procedure should only be performed by trained and authorized personnel as follows:



#### **Steps for preparing for shutdown include the following:**

- a. Identify the equipment that needs to be locked off and the energy sources used to operate the equipment.
- b. Identify the potential hazards of that energy
- c. Identify the method to control the energy – electrical, valve etc.



- d. Inform all affected employees and let them know who is locking off the equipment and why they are doing it.
- e. Turn off the equipment following agreed procedures.
- f. Isolate all energy sources in the equipment and ensure all stored energy has been removed from the equipment. This can include:
  - i. Bleeding, flushing pipes with liquids or gases
  - ii. Removing heat or cold
  - iii. Releasing tension in springs
  - iv. Releasing trapped pressure
  - v. Block parts that may fall due to gravity
- g. Lock off energy device controls such as switches, valves and circuit breakers using an appropriate lockout device and secure with safety padlock
- h. Tag out the lockout device as follows using an appropriate tag;
  - i. Tags used must be highly visible with prominent warning to warn employees of the danger of re-energizing the equipment
  - ii. Tags must be durable and be securely fastened to the lockout device
  - iii. Tag details must be completed in full



- i. Test the energy device controls to ensure equipment has been locked out.
- j. Place key of safety padlock in Group Lockout Box and secure Group Lockout Box with their own personal padlock.
- k. Each person working on the equipment should put their own personal padlock on the Group Lockout Box prior to commencing maintenance work.
- l. Perform maintenance and do not bypass the lockout. The maintenance work should be done in conjunction with and as set out in a 'Permits to Work' document.
- m. On completion of maintenance work, follow the agreed procedures to reactivate the equipment as follows:
  - i. Remove any blocks put in place and re-install any safety guards.
  - ii. Remove personal padlock from Group Lockout Box
  - iii. Once all personal padlocks have been removed from the Group Lockout Box, keys to the safety padlocks are removed and used to remove all lockout devices and tags.
  - iv. Re-start the equipment and test to ensure all is ok.
  - v. Cancel the 'Permits to Work' and sign off the work.
  - vi. Let the relevant employees know that the equipment is ready for use.

**Note to the Promatek Technical Team:**

*Please note that the LOTO Programme of the Customers, may override some of the above procedures. Promatek Safety Officer should always align with the Customers' Safety/Technical Departments to find out what is obtainable at the customers'*

*project site, since some Customers may not grant third party access to some aspects of their installations.*

## **6.4 WORK AT HEIGHTS**

### **6.4.1 Organization and Planning**

PROMATEK Global Projects shall enforce compliance with the Work at Heights regulation of 2005 by ensuring that work at height is:

- a. properly planned
- b. appropriately supervised; and
- c. carried out in a manner which is so far as is reasonably practicable safe, and that its planning includes the selection of work equipment in accordance with regulation

Planning of work includes planning for emergencies and rescue. Work at height should be carried out only when the weather conditions does not jeopardize the health or safety of persons involved in the work.

### **6.4.2 Competence**

**PROMATEK Global Projects** shall ensure that no person engages in any activity, including organisation, planning and supervision, in relation to work at height or work equipment for use in such work unless he is competent to do so.

### **6.4.3 Avoidance of risks from work at height**

- a. In identifying the measures required by this regulation, PROMATEK shall take account of a risk assessment
- b. shall ensure that work is not carried out at height where it is reasonably practicable to carry out the work safely otherwise than at height.
- c. Where work is carried out at height, we shall take suitable and sufficient measures to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury.

### **6.4.4 Selection of work equipment for work at height**

In selecting work equipment for use in work at height, **PROMATEK Global Projects** shall:

- a. give collective protection measures priority over personal protection measures.
- b. take account of:
  - i the working conditions and the risks to the safety of persons at the place where the work equipment is to be used;
  - ii in the case of work equipment for access and egress, the distance to be negotiated;
  - iii the distance and consequences of a potential fall;
  - iv the duration and frequency of use;
  - v the need for easy and timely evacuation and rescue in an emergency;
  - vi any additional risk posed by the use, installation or removal of that work equipment or by evacuation and rescue from it;

#### **6.4.5 Duties of persons at work**

- a. Every Employee shall, where working under the control of another person, report to that person any activity or defect relating to work at height which he knows is likely to endanger the safety of himself or another person.
- b. Every Employee shall use any work equipment or safety device provided to him for work at height in accordance with— any training in the use of the work equipment or device concerned which have been received by him.

### **6.5 ACCIDENT REPORTING AND INVESTIGATION**

Accidents cause suffering, pains, and death to victims. Damage is also done to plants and machine/equipment. It is the company's desire to prevent accidents from occurring, thus great emphasis is placed on the prevention of accidents.

Also, since accidents cannot be eliminated, the causes must be determined whenever an accident occur, to prevent a re-occurrence. This suggests that information on accidents needs to be reported and documented.

- 6.5.1 Every employee of the company is therefore expected to report immediately to his/her supervisor every accident, which occurs to him, a fellow employee, or any machinery/equipment in the workplace.
- 6.5.2 The supervisor in turn is required to look into the circumstance surrounding the accident and correct any unsafe acts and/or conditions responsible for it. Where such cause and conditions cannot be immediately rectified, he should make recommendations to the safety officer to avoid similar mishap occurring in the future.
- 6.5.3 The supervisor needs the full co-operation of employees if he is to get at the root cause(s) of an accident. Employees should therefore view accident investigation as a fact finding and not a faultfinding exercise. If the facts are not identified, any preventive measures prescribed will be based on falsehood and are bound to fail in achieving our set objective.
- 6.5.4 Employee should look at accident investigation as one avenue through which Management's commitment to the safety, health and welfare of its employees is demonstrated. Our Management will therefore not hesitate to deal seriously with any worker who obstructs or hides facts during an investigation while reward shall be given to the employee who reports accidents.

## 7. ENVIRONMENTAL MANAGEMENT.

**PROMATEK GLOBAL PROJECTS LTD** is committed to the preservation, protection, and sustainable development of the environment, and pursues this commitment by:

- a. Fully understanding the environmental impacts of its operations, services, equipment, products, packages and continuously look for ways to minimize these impacts.
- b. Continuously improving our environmental engagement in line with the *ISO 14001:2015 Environmental Management System* standards requirements.
- c. Minimizing the discharge of waste materials (where applicable) into the environment, effectively utilizing resources and employing responsible pollution prevention and control practices.
- d. Identifying and implementing ways to improve the efficiency of the use of materials and resources, minimizing emissions and recycling waste.
- e. Committing to protecting the climate by reducing energy use and coolant emissions.
- f. Encouraging and equipping employees to identify and act upon opportunities to improve environmental performance and waste management in the areas where they work.
- g. Complying with all relevant environmental legislations and regulations of Local and State Governments as well as the Federal Republic of Nigeria and applying high internal environmental management standards.
- h. Establishing and reviewing environmental goals and objectives and auditing our processes to assess our performance and achievements against set standards.
- i. Communicating our environmental policy and performance to employees, customers, governments, contractors, visitors, other stakeholders and interested parties.

In doing these, we shall **satisfy the interests** of our customers and stakeholders and thereby **grow our business profitably in a friendly and sustainable environment.**

## 7.1 NOISE PERMISSIBLE LEVELS

- 7.1.1 Where the company's activities may likely emit noise in excess of the permissible levels, application shall be made to the relevant government agency for a permit to emit noise in excess of the permissible levels, as specified in the *National Environmental (Permitting and Licensing System) Regulations, 2009*.
- 7.1.2 The company shall ensure that the *Noise Permit* satisfies all requirements relating to the way the company's activities should be carried out; and should specify:
- a. the plant or machinery to be used
  - b. the hours during which the work or activities may be carried out
  - c. the level of noise which may be emitted above the permissible noise levels
  - d. the works or activities and the method by which they are to be carried out
  - e. the steps proposed for minimizing noise resulting from the works or activities
  - f. the need to ensure that the best practicable means are employed to minimize noise
  - g. the need to protect any person in the locality in which the premises in question are situated, from the effects of the noise
- 7.1.3 Where the works or activities to which the Noise Permit relates are carried out by an agent or persons other than Promatek Global Projects, the permit holder, (the Company) will take it upon itself to take all steps to ensure that the Permit and any conditions specified in it are complied with by the agent/person carrying out the works or activities.
- 7.1.4 Promatek Global Projects will avoid any acts that will allow for revocation of Noise Permits by the government by ensuring that the continued emission of noise beyond the permissible levels does not lead to significant adverse impacts to the residents in the area.

## 7.2 ENVIRONMENTAL SANITATION AND WASTES CONTROL

- 7.2.1 Promatek Global Projects will ensure the adoption of sustainable and environment friendly practices in environmental sanitation and waste



management to minimize pollution, wherever we work or carry out our activities.

7.2.2 Promatek Global Projects in all its facilities shall:

- a. provide welfare facilities such as potable water, conveniences cloakrooms and canteen
- b. provide educational and pictorial signs to direct persons where they can drop wastes
- c. provide receptacles for recyclable materials in appropriate and easily accessible locations
- d. service, maintain and empty the receptacles regularly
- e. keep the premises, drains and all public or private lands, streets, lanes, walkways, beaches or docks within 5 meters of the boundary of the property free from litter at all times
- f. ensure that discarded materials are regularly collected and disposed of sanitarily
- g. ensure that recyclable materials are properly packed and neatly stacked; and
- h. ensure sorting and segregation of solid waste at source.

7.2.3 In managing its premises, Promatek Global Projects shall:

- a. provide portable water supply for the premises to ensure sound environmental sanitation and personal hygiene
- b. provide adequate number of toilets for the employees as prescribed by government regulations
- c. ensure that the construction and maintenance of septic tank or soak away pit or other on-site sanitation facilities comply with the provisions of government regulations
- d. ensure regular maintenance of the building structure
- e. provide drains for wastewater, storm water and ensure linkage to surrounding network
- f. ensure that untreated sewage is not piped or discharged into public drains or roads; and

- g. ensure regular dislodgement and safe disposal of the contents of the septic tank.

## 8. EXCEPTIONS.

There are currently no exceptions to this policy manual. Any major change that affects this policy must be recommended by the Project/Engineering Director and approved by the Managing Director. The policy will however be updated/ reviewed periodically to keep up with changes in the business.

## 9. EFFECTIVE DATE.

This policy is effective upon approval by the Managing Director.

**APPROVED**



23.09.2020

Marcel Ananaba

Managing Director