



## FABTECH INTERNATIONAL LIMITED

### EHSMS MANUAL (EHSMS M01)

(As per the requirements of ISO 14001:2015 and ISO 45001:2018)


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<b>Reviewed &amp; Approved by:</b>	Freeda Moraes (Executive Director)		
<b>Effective Date</b>	15-08-2020		
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## 1.0 Environment Health and Safety Policy

**FABTECH** 

Doc No:EHSP-01  
Rev-07

### HSE POLICY

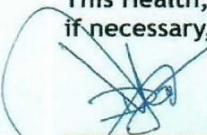
#### Policy Statement


Fabtech is committed to the health, safety and well being of its employees, customers and contractors by fostering an atmosphere that focuses on the prevention of incidents and preservation of the environment. We will operate in compliance with all relevant environmental legislations and constantly strive to conduct all activities in an efficient and eco-friendly manner, meeting guidelines and codes of conduct.

#### Our Commitment is to:

- # Comply with all applicable legal, contractual, local and international legislations as well as our EHSMS related activities.
- # Ensure that the responsibility of EHS is shared at all levels, from entry level to executive level.
- # Regularly audit our EHSMS system and EHS performance and strive for continual improvement.
- # Ensure that all employees are adequately informed of identified risks and, where appropriate, receive relevant information, instruction, training and supervision.
- # Ensure continual reduction in risks related to health, safety and environment by establishing, monitoring and achieving improvement objectives.
- # Maintain adequate documentation of the EHS Management System which will be the framework for setting and reviewing objectives and targets and continually improving our EHSMS.
- # Ensure compliance of this policy for all employees, contractors and visitors.

This Health, Safety and Environmental statement of intent will be reviewed and, if necessary, revised on an annual basis.

  
Don Moraes  
Chief Executive Officer  
Date : 5th January 2020

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## EHS Strategic Objectives

The following Strategic Objectives have been established at FABTECH INTERNATIONAL LIMITED for our EHSMS. Our Strategic objectives are SMART (Specific, Measurable, Achievable, Realistic and Time bound)

Area	Objective
Health	Ensure safe operation to minimize occupational Health Exposure to Employees, Contractors and Community
Safety	No harm to Employees, Contractors or Community
Environment	To comply with applicable laws and regulations for Environment in the county of our operations
Risk Management	Ensure safer operations
Resources	Optimize Use of resources – land ,water, energy and raw materials
Emissions to Air	Minimize Greenhouse gas emissions to achieve minimal adverse effect to environment
Discharge to water bodies	Recycle/reuse waster waters unless the discharge is as per local regulations
Soil Contamination	Prevent all major spills to avoid soil contamination
Waste Management	Control and minimize all hazardous and non-hazardous waste and treat and dispose as per national and international standards

Chief Executive Officer

*Note:- Annual SMART objectives in the area of EHSMS are being set up for the achievement of our long term strategic objectives.  
The top management decides on yearly Quantifiable and measurable targets at the beginning of each year for the SMART objectives, which is communicated to the concerned persons.  
Achievements are reviewed against the targets.*

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## 1.2 INTRODUCTION TO OUR ORGANIZATION.

### FABTECH INTERNATIONAL LIMITED

Recognized as one of the largest and most technically capable steel fabricators in the Middle East, Fabtech International Group is strategically located across the globe and headquartered in Dubai, UAE. Fabtech provides a full range of services to the oil, gas, power, water and other process industries. As a steel fabrication company, we have earned our reputation by consistently exceeding expectations of clients in manufacturing and product excellence.


Our range of services has been developed by creating specialist divisions in oil & gas, pressure vessels, rolling & dished ends, material handling, specialized engineering, construction, coating, grating, tanks and trading. Fabtech holds ASME certifications including 'U', 'U2', 'S', 'A', 'PP' & National Board 'R' stamp and is further certified to monogram equipment manufactured as per API '4F', '2B', '8A' and '8C'.

Fabtech is arguably the most diversified company of its size in the world and has successfully delivered projects to virtually every manufacturing segment on both hemispheres of the globe. Our goal is to provide the highest quality equipment and services to our clients most of whom operate in the most remote and harsh environments on earth. We are committed to assist our clients achieve their objectives in the most cost-effective manner with the lowest impact on environment without compromising quality.

### Fabrication Plant & Equipment List

Spread over a plot of 89472 square meters our workshop is equipped with state of the art facilities that includes but is not limited to the following

- Plate roller machine from Wilhelms Burger, Germany – DWN- 80/5000 for rolling plates up to 200mm thickness and 5.5 mtrs Width with 3 rollers.
- Plate roller machine for rolling plates from a min of 6mm to a max of 60 mm thickness with 3 & 4 rollers.
- CNC plasma profile cutting machine – ProArc Master 40, Bed length 12mtr, width 3.5mtr 3torch, plasma 1torch for plates up to 140 mm , max cutting oxy fuel thickness 250mm.
- Press for dished ends from Boldirini Spa Milano, Italy – PAO 600 x 7100 ton. Maximum thickness of plate that can be pressed is 20mm with a dished end diameter of 3.5mtr
- Spinning machine from Boldirini Spa Milano Italy, RIBO 25 / 4000, can spin plates up to 40 mm thickness with a 5mtr diameter.
- Vertical lathe machine – IS9340 Charles Berties from France. Chuck diameter 4mtrs, height 1mtr.
- Horizontal boring machine 13212421 from Unin Gera Germany. Bore ID of 250mm with facing facility and max flange diameter 6 mtrs.
- Lathe machine with double chuck Demoor. Chuck diameter 800mm, spindle ID 200mm, bed length 3mtr.
- Conventional lathes from chuck diameter of 150mm to 2 mtrs and bed size from 2 ft to 20 ft.
- CNC milling machine – FSM 1406D30 K 05, Droop & Rein milling station, length 6mtrs, width 2mtrs.
- CNC drilling machine – 1020S ProArc, bed length 2mtrs, width 1mtr, CNC drill diameter 40mm.
- CNC Pipe Cutting Machine - CL 124 Milton Watts INC, WA CNC 6 axis pipe cutting. Can cut pipe of maximum 300mm and Length 6mtr
- Planner machine Boehringr – planning length 3mtr, width 1.2mtr, with milling attachment.

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- Radial Drilling Machine RF 51 Csepelel Werkzeugmaschinenfabrik from Budapest Hungary. Random double nozzle welding can be done at a time with max shell diameter of 6mtr. & E4 Kichen walker England drill diameter of 90 mm with boring head.
- Auto Blasting Machine with shot blasting width of 5.5mtr, with 10 motor grit & 1.5 mtr x 2 mtr 10 motors, abrasive spraying.
- Boom welding machine from Lincon Electronic Co. Ltd. Tandem double nozzle welding can be done at a time for max shell diameter of 6mtr.
- Welding positioner 90° mobile Heinrichsgluck, Team Industrianc, H25, GRP01/ 264/FU2, maximum flange diameter 1mtr to 3 mtr.
- Mechanical hydro test pump. HMC reciprocating type 1000 PSI to 5000 PSI
- Pneumatic Hydro Test Pump. AHP 275 , AHP 425 Hi Force England, test pump 50000 PSI (pipe tested for more than 1700bar)
- EOT crane from 2 ton to 25 ton, Gantry crane from 5 ton to 32 ton and Tower Crane 10 ton.
- Electrical Air Compressor – RSF-2-90, RS 132, RS 110 Renner Germany 484 CFM, 720 CFM, 561 CFM , Atlas Copco 720 CFM , and other mobile type compressors

## FABTECH GROUP


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  - [Profile](#)
  - [Facilities](#)
  - [Projects](#)
- [FABTECH ABU DHABI LLC](#)
- [FABTECH BUILDING MATERIAL TRADING](#)
- [FABTECH CONTRACTING LLC](#)
- [FABTECH TECHNICAL SERVICES](#)
- [FABTECH COATING](#)
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## Oil & Gas

FABTECH has built and / or refurbished more than 100 Land Rigs ranging from 1000 HP to 3000 HP [Read More](#)



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### 1.3 Introduction to EHS Management System (EHSMS)

The EHSMS is an EHS Management System that takes into consideration all aspects related to the protection of the environment, of human health and of the safety of workers and the community at large.

Our EHSMS is based on the Management System requirements of ISO 14001 and ISO 45001.

It recognizes the inter-relationships between workers, the community, and the environment in contributing to the management and mitigation of the many diverse risks associated with various activities. It will also help promote a healthy and safe work environment, improve air quality, facilitate the management of industrial noise, improve waste management, encourage better industrial land use planning, reduce contamination of land, improve energy efficiency and better use of water resources.

The **EHSMS** is based on the Deming cycle of continual improvement, **PDCA** (Plan, Do, Check and Act)

#### **P of PDCA relates to the phase of planning of the EHSMS and includes the following**


- Declaration of leadership and commitment of the top management of towards the EHSMS
- Declaration of EHS policy,
- Declaration of strategic (long term) objectives for EHSMS
- Planning for roles and responsibilities for EHSMS
- Initial review of existing EHSMS with respect to the requirements of International Standards such as ISO 14001 and ISO 45001
- Planning of EHS Targets , Objectives and Programs
- Planning for legal compliance
- Identification of risks to EHS and risk management
- Planning for Emergency management regarding emergencies related to EHS
- Planning for Contractor/Sub contractor management regarding matters related to EHS
- Planning for documenting the EHSMS and documentation structure
- Planning for the records to be maintained

#### **D of PDCA relates to doing and includes the following activities**

- Implementation of all the EHS policies, objectives, targets and programs and procedures
- Ensuring that organizational structures are put into place and implemented at all levels of the organization
- Operational Control of activities related to EHS
- Training and Competency
- Hazard, Near Miss and Incident Reporting and Investigation
- Communication and Consultation

#### **C of PDCA relates to checking which includes the following activities**

- Monitoring and measuring EHS performance
- EHSMS audits
- EHS inspections
- Evaluation of compliance to regulations,
- Monitoring of objectives, targets/programs,
- Nonconformance control , corrective and preventive actions
- EHS performance reporting

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A of PDCA relates to acting on the results of checking and includes

- Conducting of management review and
- Assessment of management system effectiveness leading to continual improvement

#### 1.4 Purpose of this manual

This manual:

This Manual is our interpretation of the model for the ISO 14001 and ISO 45001 standards , and reflects our approach to all of the requirements of these International Standards.

This manual serves the following functions


- Defines EHSMS Policy and EHSMS Objectives
- Defines the structure of the EHSMS documents.
- Describes the Environment, Occupational Health and Safety Management System (EHSMS) which has been established in our organization to achieve the EHSMS Policy and Objectives.
- Describes how our EHSMS satisfies the requirements of ISO 14001 and ISO 45001 standard.

(The chapter numbers correspond to the chapter numbers of these standards)

The EHSMS manual is supported by documented EHSMS procedures and Operational control procedures which give step by step instructions and define responsibilities of various functional departments and individuals in order to effectively implement our EHSMS

The EHSMS manual enables FABTECH INTERNATIONAL LIMITED management to control and monitor its environmental aspects impacts and operational health and safety risks and improve the EHSMS performance.

The systems set out in this manual are to be mandatorily implemented by all the staff of FABTECH INTERNATIONAL LIMITED. All staff from the supervisory position onwards should be familiar with this manual.

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## 2.0 SCOPE of EHSMS Management System:

The scope of the EHSMS is as follows

Oil & Gas Fields Equipment Manufacturing,  
Structures & Structural Steel Manufacturing,  
Rigs & Oilfield Platforms Manufacturing,  
Lathe Workshop  
Metal Buckets Manufacturing,  
Steel Fabrication & Welding Workshop  
Tanks Manufacturing

The key processes of the organization are:

- Sales
- Purchasing
- Storage
- Production
- Finished good storage
- Quality control
- Maintenance of plants and equipment
- Calibration of measuring , process control and EHS equipment and instruments
- Dispatch to customers
- Management and Training of Human resources
- Quality Assurance

## 2.1 Control and Issue of this manual

The EHS Management Representative is responsible for the administration of the EHSMS Manual, in accordance with procedures for Document and Data control

### 2.1.1 Authority – Preparation & Approval of Manual

This manual is prepared by the EHSMS MR and approved by the Chairman

### 2.1.2 Revision Status

The contents page of this Manual lists the date and status of revisions to the manual.

### 2.1.3 Issue of Manual

Master copy of this EHSMS Manual is held by the MR. “Controlled” copies of the manual are issued to the designated list of Manual holders, by the MR.

### 2.1.4 Issue of Manual Revisions


Revisions to the manual are issued in a manner similar to the original issue. All holders of the controlled copies are issued with the revisions.

### 2.1.5 Queries

All Queries regarding the Manual are to be addressed to the MR.

### 2.1.6 Controlled and Uncontrolled Copies




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Manuals issued/re-issued to the designated copy holders are termed as controlled copies, and they bear the rubber stamp, "Controlled Copy", on all the pages in blue color. The controlled copies in the possession of the Manual holders are current (the latest issue). Uncontrolled copies may be issued to clients, assessment bodies or anyone else interested. The uncontrolled copies of this Manual are current only at the time of issue.

All Controlled copies of this EHSMS Manual are assigned a unique copy number and distributed to the personnel detailed in the EHSMS Manual distribution list.



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### 3.0 TERMS AND DEFINITIONS RELATED TO EHS MANAGEMENT SYSTEM

#### 3.1

##### **Auditor**

Person with the competence to conduct an audit

#### 3.2

##### **Continual improvement**

Recurring process of enhancing the **EHSMS** (3.8) in order to achieve improvements in overall **HSE performance** (3.10) consistent with the **organization's** (3.16) **HSE policy** (3.11)

#### 3.3

##### **Corrective action**

Action to eliminate the cause of a detected **nonconformity** (3.15)

#### 3.4

##### **Documents**

Information and its supporting medium

NOTE: The medium can be paper, magnetic, electronic or optical computer disc, photograph or master sample, or a combination thereof.

#### 3.5

##### **HSE**

Surroundings in which an **organization** (3.16) operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation

NOTE: Surroundings in this context extend from within an **organization** (3.16) to the global system.

#### 3.6

##### **Environmental aspect**

Element of an **organization's** (3.16) activities or products or services that can interact with the **environment** (3.5)

NOTE: a significant environmental aspect has or can have a significant **environmental impact** (3.7).

#### 3.7

##### **Environmental impact**

Any change to the **environment** (3.5), whether adverse or beneficial, wholly or partially resulting from an **Organization's** (3.16) **environmental aspects** (3.6)

#### 3.8

##### **EHSMS**

Part of an **organization's** (3.16) management system used to develop and implement its **HSE policy** (3.11) and manage its **environmental aspects and Health and Safety Hazards**. (3.6)


NOTE 1 A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives.

NOTE 2 A management system includes organizational structure, planning activities, responsibilities, practices, **procedures** (3.19), processes and resources.

#### 3.9

##### **EHS objective**

Overall environmental goal, consistent with the **HSE policy** (3.11), that an **organization** (3.16) sets itself to achieve

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### 3.10

#### HSE performance

Measurable results of an **organization's** (3.16) management of its **HSE aspects** (3.6)

NOTE: In the context of **EHS management systems** (3.8), results can be measured against the **organization's** (3.16) **HSE policy** (3.11), **EHS objectives** (3.9), **EHS targets** (3.12) and other HSE performance requirements.

### 3.11

#### HSE policy

Overall intentions and direction of an **organization** (3.16) related to its **HSE performance** (3.10) as formally expressed by top management

NOTE The HSE policy provides a framework for action and for the setting of **HSE objectives** (3.9) and **HSE targets** (3.12).

### 3.12

#### HSE target

Detailed performance requirement, applicable to the **organization** (3.16) or parts thereof, that arises from the **HSE objectives** (3.9) and that needs to be set and met in order to achieve those objectives

### 3.13

#### Interested party

Person or group concerned with or affected by the **HSE performance** (3.10) of an **organization** (3.16)

### 3.14

#### Internal audit

Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the EHSMS audit criteria set by the **organization** (3.16) are fulfilled

NOTE: In many cases, particularly in smaller organizations, independence can be demonstrated by the freedom from responsibility for the activity being audited.

### 3.15

#### Nonconformity

Non-fulfillment of a requirement

### 3.16

#### Organizations

Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration

### 3.17

#### Preventive action


Action to eliminate the cause of a potential **nonconformity** (3.15)

### 3.18

#### Prevention of pollution

Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse **environmental impacts** (3.7)

NOTE: Prevention of pollution can include source reduction or elimination, process, product or service changes, efficient use of resources, material and energy substitution, reuse, recovery, recycling, reclamation and treatment.

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### 3.19 procedures

Specified way to carry out an activity or a process

NOTE: Procedures can be documented or not.

### 3.20 records

**Document** (3.4) stating results achieved or providing evidence of activities performed

## TERMS AND DEFINITIONS RELATED TO O, H and S MANAGEMENT SYSTEM

### 3.21 Acceptable risk

Risk that has been reduced to a level that can be tolerated by the organization having regard to its legal obligations and its own EHS policy (3.16)

### 3.22 Hazard

Source, situation, or act with a potential for harm in terms of human injury or ill health (3.8), or a combination of these

### 3.23 Hazard identification

Process of recognizing that a hazard (3.6) exists and defining its characteristics

### 3.24 Ill health

Identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/or work-related situation

### 3.25 Incident

Work-related event(s) in which an injury or ill health (3.8) (regardless of severity) or fatality occurred, or could have occurred

NOTE 1 An accident is an incident which has given rise to injury, ill health or fatality.

NOTE 2 An incident where no injury, ill health, or fatality occurs may also be referred to as a “near-miss”, “near-hit”, “close call” or “dangerous occurrence”.

NOTE 3 An emergency situation (see 4.4.7) is a particular type of incident.

### 3.26 Interested party

Person or group, inside or outside the workplace, concerned with or affected by the EHS performance of an organization (3.17)

### 3.27 Nonconformity

Non-fulfillment of a requirement


NOTE: Nonconformity can be any deviation from:

- Relevant work standards, practices, procedures, legal requirements, etc.
- EHS management system requirements.

### 3.28 Occupational health and safety (EHS)

Conditions and factors that affect, or could affect the health and safety of employees or other workers (including temporary workers and contractor personnel), visitors, or any other person in the Workplace

NOTE: Organizations can be subject to legal requirements for the health and safety of persons beyond the immediate workplace, or who are exposed to the workplace activities.

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### 3.29 EHS management system

Part of an organization's management system used to develop and implement its EHS policy and manage its EHS risks

NOTE 1 A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives.

NOTE 2 A management system includes organizational structure, planning activities (including, for example, risk assessment and the setting of objectives), responsibilities, practices, procedures processes and resources.

### 3.30 EHS objective

EHS goal, in terms of EHS performance that an organization sets itself to achieve

NOTE 1 Objectives should be quantified wherever practicable.

NOTE 2 4.3.3 requires that EHS objectives are consistent with the EHS policy

### 3.31 EHS Performance

Measurable results of an organization's management of its EHS risks

NOTE 1 EHS performance measurement includes measuring the effectiveness of the organization's controls.

NOTE 2 In the context of EHS management systems results can also be measured against the organization's EHS policy EHS objectives and other EHS performance requirements.

### 3.32 EHS policy

Overall intentions and direction of an organization related to its EHS performance as formally expressed by top management

NOTE: The EHS policy provides a framework for action and for the setting of EHS objectives

### 3.33 Risk

Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health (3.8) that can be caused by the event or exposure(s)

### 3.34 Risk assessment

Process of evaluating the risk(s) (3.21) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable

### 3.35 Workplace

Any physical location in which work related activities are performed under the control of the organization

NOTE: When giving consideration to what constitutes a workplace, the organization should take into account the EHS effects on personnel who are, for example, travelling or in transit (e.g Driving, flying, on boats or trains), working at the premises of a client or customer, or working at home.


### 3.36

Safety: freedom from unacceptable risk of harm.

### 3.37

Tolerable risk: risk that has been reduced to a level that can be endured by the organization having regard to its legal obligations and its own HSE policy.

**Note: The above definitions are from ISO 14001 and ISO 45001 standards**

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ISO 14001 & ISO 45001 clauses comparison chart as follows:

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4 Context of the organization	4 Context of the organization
4.1 Understanding the organization and its context	4.1 Understanding the organization and its context
4.2 Understanding the needs and expectations of interested Party	4.2 Understanding the needs and expectations of interested Party
4.3 Determining the scope of the quality management system	4.3 Determining the scope of the quality management system
4.4 Environmental management system	4.4 OH&S management system
5 Leadership	5 Leadership and worker participants
5.1 Leadership and commitment	5.1 Leadership and commitment
5.2 Environmental Policy	5.2 OH&S policy
5.3 Organizational roles, responsibilities and authorities	5.3 Organizational roles, responsibilities and authorities
-	5.4 Consultation and Participation of the worker
6 Planning	6 Planning
6.1 Actions to address risks and opportunities	6.1 Actions to address risks and opportunities
6.1.1 General	6.1.1 General
6.1.2 Environmental aspects	6.1.2 Hazard identification and assessment of risks and opportunities
6.1.3 Compliance obligation	6.1.3 Determination of legal requirements and other requirements
6.1.4 Planning action	6.1.4 Planning to take action
6.2 Environmental objectives and planning to achieve them	6.2 OH&S objectives and planning to achieve them
6.2.1 Environmental Objectives	6.2.1 OH&S Objectives
6.2.2 Planning actions to achieve environmental objectives	6.2.2 Planning to achieve OH&S objectives
7 Support	7 Support
7.1 Resources	7.1 Resources



7.2 Competence	7.2 Competence
7.3 Awareness	7.3 Awareness
7.4 Communication	7.4 Communication
7.4.1 General	7.4.1 General
7.4.2 Internal communication	7.4.2 Internal communication
7.4.3 External communication	7.4.3 External communication
7.5 Documented information	7.5 Documented information
7.5.1 General	7.5.1 General
7.5.2 Creating & updating	7.5.2 Creating & updating
7.5.3 Control of Documented Information	7.5.3 Control of Documented Information
<b>8 Operation</b>	<b>8 Operation</b>
8.1 Operational planning and control	8.1 Operational planning and control
-	8.1.1 General
-	8.1.2 Eliminating hazards and reducing OH&S risks
-	8.1.3 Management of change
-	8.1.4 Outsourcing
-	8.1.5 Procurement
-	8.1.6 Contractors
8.2 Emergency preparedness and response	8.2 Emergency preparedness and response
<b>9 Performance evaluation</b>	<b>9 Performance evaluation</b>
9.1 Monitoring, measurement, analysis and evaluation	9.1 Monitoring, measurement, analysis and evaluation
9.1.1 General	9.1.1 General
9.1.2 Evaluation of Compliance	9.1.2 Evaluation of Compliance
9.2 Internal Audit	9.2 Internal Audit
9.2.1 General	9.2.1 General
9.2.1 Internal audit programme	9.2.1 Internal audit programme
9.3 Management Review	9.3 Management Review
<b>10 Improvement</b>	<b>10 Improvement</b>
10.1 General	10.1 General
10.2 Nonconformity and corrective action	10.2 Incident, nonconformity and corrective action
10.3 Continual Improvement	10.3 Continual Improvement

**4.0 Context of Organization**

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#### 4.1 Understanding the Context of Organization

FABTECH INTERNATIONAL LIMITED uses SWOT analysis to determine and consider both internal and external issues which impact FABTECH INTERNATIONAL LIMITED strategic objectives and planning of its EHSMS.

FABTECH INTERNATIONAL LIMITED will continuously monitor and review the information about the internal and external needs and expectations;

Consideration is given to the:

- External context and issues, such as legal, regulatory, technological, competitive, cultural, social, political and economic environments.
- Authority and ability to exercise control and influence
- Internal context and issues, such as values, culture, organization structure, knowledge and performance of the business.
- Positive and negative factors or conditions.
- Determination and requirements of the needs and expectations of interested parties.
- Documented information is retained as evidence to support context of the organization has been addressed

#### 4.2 Needs and Expectations of Interested Parties

FABTECH INTERNATIONAL LIMITED has determined interested parties and relevant requirements of Interested parties for EHS management system. Interested parties are those they could affect or potentially affect the organization's ability to constantly provide the services that meet the customer and applicable statutory and regulatory requirements. FABTECH INTERNATIONAL LIMITED will monitor and review the information about Interested parties and relevant requirements.

#### Internal Interested Party's Needs & Expectations





Sl. No.	Department	Interested Party	Needs & Expectations	EHSMS Compliance	Impact
1	Engineering (Structural)	HSE, Production, Operations, QA/QC. Purchase, Accounts, Transport, Anti-Corrosion Maintenance,	Assistance in JAFZA EHS documentations and approvals, HSE permits, Internal documents approvals, HSE protective product selections, Control / minimization of impacts to the HSE, Conservation of Natural resources	Compliance to JAFZA EHS procedures & Internal EHSMS procedures , Control / minimization of impacts to the HSE	Damage to HSE due to uncontrolled operations/ Emissions, Penalties, Loss of reputations
2.	Engineering (Pressure Vessel)	HSE, Production, Operations, QA/QC. Purchase, Accounts, Anti-Corrosion, Transport, Maintenance,	Assistance in JAFZA EHS documentations and approval., HSE permits. Internal documents approvals. Eco friendly product selections, Control / minimization of impacts to the HSE, Conservation of Natural resources.	Compliance of JAFZA EHSMS procedures. Internal EHSMS procedures, Control / minimization of impacts to the HSE	Damage to HSE due to uncontrolled operations/ Emissions, Penalties.
3	QA/QC	HSE, Production, Operations, Purchase, Accounts, Transport, Maintenance,	Control / minimization of impacts to the environment during all NDT tests & PWHT process. Waste management, Conservation of Natural resources, flora & Fauna.	Compliance of JAFZA EHSMS procedures, Internal EHSMS procedures, applicable regulatory requirements and obligations. Minimization of impacts to the HSE from business operation.	Damage to HSE due to any atmospheric emission during NDT tests, Air & Land pollution. Penalties. Damage to flora & Fauna, Loss of reputation
4	Planning /Project	HSE, Production ,Operations, Anti-Corrosion Purchase, Accounts, Transport, Maintenance,	Client EHSMS requirements. Timely submission of EHSMS documents. Plan/ minimization of impacts to the HSE from business operation. Conservation of Natural resources.	Compliance of External & Internal EHSMS procedures. Conservation of Natural resources	HSE damage due to usage non Eco friendly materials, Cancellation of project, Loss of reputation.
5	Procurement & Stores	HSE, Planning /Project ,Production ,Operations, Anti-Corrosion Accounts,	Finance /Procurement of Eco friendly product/equipment and materials. Safe storage of non eco friendly products &	Compliance of External & Internal EHSMS procedures , Compliance to Conservation of	Environmental damage, Air / Land pollution. Ozone depletion. Global warming. Loss of



		Transport, Maintenance,	materials. Waste management. Conservation of Natural resources	Natural resources, compliance to international applicable HSE regulations	reputation
6	Human Resource & Administration	HSE, Production ,Operations, Anti-Corrosion Purchase, Accounts, Transport, Maintenance	Assistance in JAFZA EHS documentations and approvals. Internal documents approvals, Procurement & usage of Eco friendly office equipment and materials. Waste management, Conservation of Natural resources	Compliance of External & Internal EHSMS procedures	Damage to HSE due to uncontrolled operations/ Emissions, Air / Land pollution. Ozone depletion , Penalties, Loss of reputation
7	Information Technology	HSE, Production ,Operations, Anti-Corrosion Purchase, Accounts, Transport, Maintenance	Conservation of Natural resources, Eco friendly product selections, Promote E filing system. Waste management.	Compliance of External & Internal EHSMS procedures, compliance to manufacturer product information on waste Management	Damage to environment / pollution, Penalties, Loss of reputation.
8	Accounts	HSE, Production ,Operations, Anti-Corrosion Purchase, Transport, Maintenance	Conservation of Natural resources, Eco friendly product /Equipment approvals, Promote E filing system. Waste management approvals	Compliance of External & Internal EHSMS procedures, compliance to international standards for eco friendly product usage	Damage to HSE due to poor financed operations, Emissions, Air / Land pollution. Ozone depletion , Penalties, Loss of reputation
9	Maintenance	HSE, Production ,Operations, Anti-Corrosion Purchase, Transport	Timely & systematic Preventive maintenance of all vehicles & equipment. Proper Storage & Disposal of hazardous wastes generated by the maintenance activity. Use of Eco-friendly products & accessories Conservation of Natural resources i.e. Fuel, Energy & water, flora & Fauna.	Compliance of External & Internal EHSMS procedures, local Regulations & RTA regulations. compliance to international standards for eco friendly product usage, Waste Management	Damage to HSE due to uncontrollable operations. Penalty. Water, Air & Land pollution. Ozone depletion and Global warming
10	Anti-Corrosion	HSE, Production ,Operations, Purchase, Transport, Accounts	Introduction & Use Eco-friendly products. Client EHSMS requirements. Timely submission of EMS documents. Plan/Control /	Compliance of JAFZA & Internal EHSMS procedures compliance to international standards for	Damage to human being, flora & Fauna, damage to HSE due to uncontrolled operations.



			<p>minimization of impacts to the HSE t from business operation.</p> <p>Conservation of Natural resources.</p> <p>Waste management.</p>	<p>eco friendly product usage, Waste Management</p>	<p>Spillage.</p> <p>Land, Air &amp; Water pollution.</p> <p>Penalty or other legal actions.</p> <p>Loss of reputation</p>
11	Operations	<p>HSE, Production, Planning /Project QA/QC.</p> <p>Purchase, Accounts, Anti-Corrosion, Transport, Maintenance</p>	<p>Introduction &amp; Use Eco-friendly products.</p> <p>Client EHSMS requirements Assistance in JAFZA EHS documentations and HSE permits approvals, Internal document approvals, Control / minimization of impacts to the HSE Conservation of Natural resources</p>	<p>Compliance of JAFZA EHSMS procedures, Internal EHSMS procedures, applicable regulatory requirements and obligations, compliance to international standards for eco friendly product usage, Waste Management.</p>	<p>Damage to HSE due to uncontrollable operations.</p> <p>Penalties.</p> <p>Water, Air &amp; Land pollution.</p> <p>Ozone depletion and Global warming</p>
12	Employees (including onsite labor)	<p>HSE, Production, HR, Planning /Project, QA/QC.</p> <p>Purchase, Accounts, Anti-Corrosion, Transport, Maintenance</p>	<p>Safe &amp; healthy work Environment, treated with dignity and respect</p>	<p>Health &amp; safety and Employee wellness programs established to promote worker safety &amp; wellbeing, appropriate engineering controls &amp; protective equipment as necessary to work safely, Emergency preparedness &amp; response plan effectively communicated &amp; tested, Compliance to legal requirements.</p>	<p>HSE incidents, Damage to human being, flora &amp; Fauna, damage to HSE due to uncontrolled operations.</p> <p>Spillage.</p> <p>Land, Air &amp; Water pollution.</p> <p>Penalty or other legal actions.</p> <p>Loss of reputation</p>



13	Health & Safety	Production, QA/QC, Purchase, Accounts, Transport, Maintenance, HR & Admin	Zero Incident/ accident , Finance provision, Purchase of HSE friendly products, Resource conservations, Provision of Competent personnel	Inspection delay, Delay of project activity ,damage to HSE , damage to reputation, Non compliance of JAFZA /UAE regulations	Project Delay, Penalties, Loss of reputation, HSE
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Reference: EHS M02 F01

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### External Interested Party's Needs & Expectations

Sl. No.	Interested Party	Needs & Expectations	EHSMS Compliance	Impact
1	Customers /Clients	Control / minimization of impacts to the HSE from business operations. Use HSE friendly raw materials/products.	Production compliant to applicable regulatory requirements and customer specifications, manufacturing operations with HSE controls to minimize impacts, operations with continuous HSE improvement mechanisms	Violations of EHS regulatory requirements, Damage to HSE, Penalties, compensations
2	Service Providers	Safe and healthy work HSE, treated with dignity and respect, Control / minimization of impacts to the HSE from operations, waste Management	Promote culture to save & protect HSE. Appropriate engineering controls, administrative controls, and protective equipment as necessary to protect HSE. Emergency preparedness and response plans effectively communicated and tested. Communication of HSE risks & control to all employees.	Damage to HSE, due to non compliances to HSE Regulations. Penalties, compensations
3	Supply chain	Ethical business practices, availability /Supply of HSE friendly products.	Clearly communicated Supplier Sustainability (including HSE) requirements. Waste management's etc.	Damage to HSE, due to non HSE friendly products or waste generations. Penalties, compensations
4	Govt. Depts.	Compliance to applicable regulatory requirements and obligations, Control / minimization of impacts to the HSE from business operations, waste Management,	Applicable permits, licenses, and registrations. Filing of all required reporting obligations. Compliance to waste management regulations, Approval of HSE friendly products, waste Management	Damage to Environment, due to non compliances to HSE Regulations Penalties, compensations
5	RTA	Compliance to applicable RTA regulatory requirements and obligations, Introduction of environment friendly type vehicles	Compliance to RTA permits for transportations , Usage of HSE friendly products	Damage to HSE through air emissions or oil spills etc. waste of natural resources. Penalties, compensations



6	Neighborhood Organizations	Clean HSE, no odors or excessive noise, responsive to complaints and neighborhood concerns, waste Management	Local community comments and complaints process with process for responding. Effective operation of manufacturing facilities. Compliances to HSE Regulations.	Damage to Human being & or HSE, due to non compliances to HSE Regulations, Penalties, compensations
7	Laboratories (water / Air sampling )	Adherence to applicable JAFZA regulatory requirements and obligations.	Compliance to applicable regulatory requirements and obligations,	Damage to HSE from uncontrolled operations/ waste Management , Penalties, compensations
8	Transportation by third party/ hiring of cranes & equipment	Ethical business practices, Control / minimization of impacts to the HSE from business operations, Control on usage of natural resources, Adherence to RTA Regulations.	Compliance to applicable RTA /JAFZA EHS / waste Management Regulations, Preservation of Flora & Fauna.	Damage to HSE, due to non compliances to HSE Regulations, Penalties, compensations
9	Insurance Companies	Suitable insurance products to cover potential risks to HSE.	Compliance to applicable regulatory requirements and obligations.	Penalties, compensations and/or prosecution (T)


Reference: EHS M02 F02

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		STRENGTH (S)	WEAKNESS (W)
INTERNAL		HIGH EXPERIENCED OWNER	HIGH TRANSPORTATION COSTS
		STRONG BRAND NAME	LEADERSHIP & MANAGEMENT ISSUES
		STRONG COMPANY PROFILES WITH EXPERTISE	COMPETITORS CAN OFFER SIMILAR PRODUCT QUALITY
		VERY GOOD RELATIONSHIP WITH CUSTOMERS/SUPPLIERS	TIME SCALES, DEADLINES & PRESSURE
		STRONG QUALITY & DEVELOPMENT PROCESS	MARKET AWARENESS & REPUTATION
		FLEXIBILITY ON PRODUCT, PRICING	POOR QUALITY OF RAW MATERIALS
		GOOD WORKING HSE	GAP IN SKILLS & KNOWLEDGE
		HIGH VISIBLE WEBSITE	STAFF MOTIVATION & INVOLVEMENT
			FINANCIAL ISSUES
		SALARY STRUCTURE	
EXTERNAL		HUGE COMPETITOR MARKET	RISE RAW MATERIAL, ENERGY & TRANSPORT COST
		BUSINESS PRODUCT DEVELOPMENT	STRONG COMPETITION/ PRICE WARS WITH CUSTOMERS
		FAST GROWING MARKET	GOVERNMENT & HSE REGULATIONS
		NEW INTERNATIONAL MARKETS	LOSS OF MAJOR CUSTOMERS
		BE FASTER, BETTER, EASIER	NEW CONTRACT & PARTNERS
		REDUCE COST	ECONOMIC CRISIS
		INNOVATION ON TECHNOLOGY DEVELOPMENT	LOST TRUST
		ENTER NEW MARKETS	RISING LABOR COST
			LOSS OF RESOURCES
		LOSS OF KEY STAFF	
		OPPORTUNITIES (O)	THREATS (T)

#### 4.3 EHS management system and its process

FABTECH INTERNATIONAL LIMITED has established, implemented and maintains EHS management system, including the processes needed and their interactions, in accordance with the requirements of ISO14001:2015

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and ISO 45001:2018 standards and is maintained and continually improved using HSE policy, HSE objectives, audit results, analysis of data, corrective actions and management reviews.

FABTECH INTERNATIONAL LIMITED has adopted a process approach for its management system. By identifying the top-level processes within the company, and then managing each of these discretely, this reduces the potential for nonconforming of its service, discovered during final processes or after delivery. Instead, nonconformities and risks are identified in real time based on clause 6.1, by actions taken within each of the top-level processes

**The key processes of the organization are:**


- Sales
- Purchasing
- Storage
- Production
- Finished good storage
- Quality control
- Maintenance of plants and equipment
- Calibration of measuring , process control and HSE equipment and instruments
- Dispatch to customers
- Management and Training of Human resources
- Quality Assurance

Each process is supported by other activities, such as tasks or sub-processes. Monitoring and control of top-level processes ensures effective implementation and control of all subordinate tasks or sub-processes

**5.1 Leadership and commitment**

FABTECH INTERNATIONAL LIMITED Top Management takes responsibility for the effectiveness of the EHS and will demonstrate their commitment to the EHSMS by:



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- Defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective EHS management system.
- Roles and Responsibilities are documented through job descriptions and EHS procedures established where applicable.
- The HSE policy and EHS objectives are established for EHSMS are aligned with the context and strategic direction of FABTECH INTERNATIONAL LIMITED.
- Taking accountability for the effectiveness of the EHS management system by periodical review of the management system through management review meeting, EHS objectives review and providing necessary resources.
- The integration of the EHSMS requirements into the FABTECH INTERNATIONAL LIMITED business processes.
- Providing and Ensuring the resources needed for the EHS management system are available and periodically reviewing through Management review meeting.
- Establishing the procedures for promoting the use of process approach for FABTECH INTERNATIONAL LIMITED work activities and risk-based thinking.
- Communicating the importance of effective EHS management system and of conforming to management system requirements.
- Engaging, directing and supporting FABTECH INTERNATIONAL LIMITED employees to contribute to the effectiveness of the management system by providing training and conducting awareness program.
- Promoting improvement through introducing Feedback of employees, suggestion box and conducting meetings.
- Supporting other relevant management roles to demonstrate their leadership in their areas of responsibility.
- Workers are provided with PPE's, its use and safety trainings to protect workers from reprisals when reporting incidents, hazards, risks, and opportunities.
- FABTECH INTERNATIONAL LIMITED conducts periodical HSE meetings and has a procedure to ensure the participation and consultation of workers and their involvement in EHS management system.

EHSMS assists the organization in meeting applicable legal and/ or other EHSMS regulations and which either directly or indirectly deals with the following:

- Organization, Leadership and Commitment
- Legal Requirements
- EHS Objectives and Targets
- Operational Controls
- Environmental Risk Management
- Occupational Health and Safety Risk Management
- Information, Documentation and Communication
- Emergency Management
- Audits and Continuous Improvement

In order to ensure the implementation of the above, the following shall be considered as a minimum:

An EHSMS committee is established within the company under the chairmanship of the Chief Executive Officer, Technical Director, MR and Production Supervisors as members. This Committee will be responsible to review the EHSMS, once annually, to ensure that all elements are included to reflect the existing activities and any changes that may take place in these activities. In addition, the committee will review the EHSMS performance and all other EHSMS related issues

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- It is the responsibility of the EHSMS Committee to monitor the activities in the company to ensure all legislative requirements are met and unsafe HSE practices are eliminated.
- FABTECH INTERNATIONAL LIMITED Top Management ensures that all changes in its EHSMS and actions related to EHSMS are communicated to all employees to make them aware of their EHSMS obligations.
- FABTECH INTERNATIONAL LIMITED Top Management from time to time communicates its HSE Policy to any individual or group (either internal or external) concerned with or affected by the EHSMS of FABTECH INTERNATIONAL LIMITED

### 5.1.2 Customer Focus


FABTECH INTERNATIONAL LIMITED committed to focus on customer requirements to fulfil their needs and expectation in execution of its activity. Top Management demonstrates his leadership and commitment with respect to customer focus through,

- Determining, understanding and consistently meeting customer and applicable statutory and regulatory requirements.
- Determining and addressing the risk and opportunities that can affect the conformity of products and services and the ability to enhance customer satisfaction.
- Focusing and maintaining on enhancing customer satisfaction.

## 5.2 HSE POLICY

The top management of FABTECH INTERNATIONAL LIMITED has defined the HSE policy and ensured that within the defined scope of its EHSMS, HSE Policy:


- Is appropriate to the nature and scale of our organization's EHSMS Risks;

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- Includes a commitment to prevention of pollution;
- includes a commitment to prevention of injury and ill health
- Includes a commitment for continual improvement in EHS management and EHS performance
- Includes a commitment to at least comply with applicable legal requirements and with other requirements to which the organization subscribes that relate to its EHSMS aspects;
- Provides the framework for setting and reviewing;
- is documented, implemented and maintained;
- Is communicated to all persons working under the control of the organization with the intent that they are made aware of their individual;
- is available to interested parties; and
- Is reviewed periodically to ensure that it remains relevant and appropriate to the organization.
- Includes a commitment to employee consultation and participation in all health and safety matters.
- Available to relevant interested parties, as appropriate.
- Meeting statutory and legal requirements applicable.
- HSE policy has been displayed at the strategic locations and being shared Communicated, understood and applied within the organization.
- Includes a commitment to comply with requirements and continually improve the effectiveness and performance of the Environment, Health & Safety Management Systems

### 5.3 Organizational roles, responsibilities and authorities

The top management of FABTECH INTERNATIONAL LIMITED has ensured the availability of resources essential to establish, implement, maintain and improve the EHSMS. Resources include human resources (including necessary specialized skills), organizational infrastructure, technology and financial resources.

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Roles, responsibilities and authorities have been defined, documented and communicated in order to facilitate effective EHS management.

FABTECH INTERNATIONAL LIMITED's top management has appoint a specific management representative(s) who, irrespective of other responsibilities, has defined roles, responsibilities and authority for

- a) Ensuring that an EHSMS is established, implemented and maintained in accordance with the requirements of ISO 14001 and ISO 45001.
- b) Reporting to top management on the performance of the EHSMS for review, including recommendations for improvement.

Ref procedure: EHSMS-19 Roles and responsibilities for EHSMS


In addition, the following EHSMS responsibilities and authorities are assigned as follows:

Description	Roles and Responsibilities Assigned To
Ensuring that the management system conforms to applicable standards	FABTECH INTERNATIONAL LIMITED Top Management
Ensuring that the processes are delivering their intended outputs	Department Heads
Reporting on the performance of the management system and providing opportunities for improvement for the management system	Management Representative
Ensuring the promotion of customer focus throughout the organization	Department Heads
Ensuring that the integrity of the management system is maintained when changes are planned and implemented	Department Heads

#### 5.4 Participation and Consultation

FABTECH INTERNATIONAL LIMITED has established and maintaining the procedure for consultation and participation of workers at applicable level of functions in the development, planning, implementation of safety and risk for improving EHS management system

FABTECH INTERNATIONAL LIMITED management ensures it provides

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- ❖ Determine and remove obstacles or barriers to participation and minimize those that cannot be removed through risk assessments and taking control measures.
- ❖ Mechanisms, time, EHS Trainings, recourses (People, PPE's) necessary for consultation and participation
- ❖ Provide timely access to clear, understandable and relevant information about EHS management system


Emphasize the consultation of non-managerial workers on the following

- ❖ Monthly HSE Performance
- ❖ Internal Audit and Management Review Meeting
- ❖ Determine the needs and expectations of interested parties
- ❖ Establishing and Communicating EHS Policy
- ❖ Assigning organizational roles responsibilities and authorities
- ❖ Determining how to fulfill legal and other requirements
- ❖ Establishing EHS objectives and planning to achieve them

## 6.1 Action and addressing of the risk and opportunities

FABTECH INTERNATIONAL LIMITED has developed the process, to meet the identified risk / opportunities and to achieve the planned action.

The Risk / Opportunities are identified by considering internal/external issues, needs and expectation of interested parties, Environmental Aspect, Hazard Risk activities of the FABTECH INTERNATIONAL LIMITED, Compliance obligation, Potential Emergency and other requirements of organization within the scope of EHS management system.

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FABTECH INTERNATIONAL LIMITED has developed the Action plan for identified risk and opportunities in the way that,

- Provides Assurance that EHS Management achieves the intended outcomes.
- Prevent/reduce undesired effects.
- Enhance desirable effects and achieves continual improvement.

Risks are addressed in a way that either they are mitigated, or they are taken to pursue opportunities by eliminating the risk source, changing the likelihood or consequences by applying controls, sharing the risk, or retaining the risks based on management decisions.

Generally, the determined controls or risk mitigation measures takes transform into new procedure, documented responsibilities and policies, or comes as an amendment to the existing ones.

Any actions taken to address risks and opportunities are proportionate to the potential impact on the conformity of FABTECH INTERNATIONAL LIMITED services.

FABTECH INTERNATIONAL LIMITED maintains documented information for identified risk/opportunities and methods to integrate, implement planned actions into the EHS management system process

FABTECH INTERNATIONAL LIMITED will be evaluated effectiveness of the action taken on regular basis whenever required.

Opportunities to improve EHS performance can include:

- Improvement of the EHS culture of the organization;
- 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;


### **6.1.2 Hazard Identification, Risk Assessment and Environmental Aspects & Impacts**

#### **Hazard identification, risk assessment and determining controls**

The organization shall establish, implement and maintain a procedure(s) for the ongoing hazard identification, risk assessment, and determination of necessary controls.

The procedure(s) for hazard identification and risk assessment shall take into account:

- a) Routine and non-routine activities;

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- b) Activities of all persons having access to the workplace (including contractors and visitors);
- c) Human behavior, capabilities and other human factors;
- d) Identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of the organization within the workplace;
- e) Hazards created in the vicinity of the workplace by work-related activities under the control of the organization;
- f) Infrastructure, equipment and materials at the workplace, whether provided by the organization or others;
- g) Changes or proposed changes in the organization, its activities, or materials;
- h) Modifications to the OHS management system, including temporary changes, and their impacts on operations, processes, and activities;
- i) Any applicable legal obligations relating to risk assessment and implementation of necessary controls.
- j) The design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities.

The organization's methodology for hazard identification and risk assessment shall:

- a) Be defined with respect to its scope, nature and timing to ensure it is proactive rather than reactive; and
- b) Provide for the identification, prioritization and documentation of risks, and the application of controls, as appropriate.

For the management of change, the organization shall identify the OHS hazards and OHS risks associated with changes in the organization, the OHS management system, or its activities, prior to the introduction of such changes.

The organization shall ensure that the results of these assessments are considered when determining controls.

When determining controls, or considering changes to existing controls, consideration shall be given to reducing the risks according to the following hierarchy:

- a) Elimination;
- b) Substitution
- c) Engineering controls;
- d) Signage/warnings and/or administrative controls;
- e) Personal protective equipment.


The organization shall document and keep the results of identification of hazards, risk assessments and determined controls up-to-date.

The organization shall ensure that the OHS risks and determined controls are taken into account when establishing, implementing and maintaining its OHS management system.

Ref procedure: EHSMSM-08 Hazard identification and Risk to Occupational Health and Safety, EHSMSM 24 Management of change

### **Environmental aspects**

FABTECH INTERNATIONAL LIMITED has established, implemented and maintained a procedure

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- a) To identify the environmental aspects of our activities, products and services within the defined scope of the EHSMS that we can control and those that we can influence taking into account planned or new developments, or new or modified activities, products and services, and
- b) To determine those aspects that has or can have significant impact(s) on the environment (i.e. Significant environmental aspects).

This information has been documented and regularly reviewed to keep it up to date.

It has been ensured that the significant environmental aspects are taken into account in establishing, implementing and maintaining our EHSMS.

**Ref procedure: EHSMS-07 Environmental Aspects and Impacts**

### 6.1.3 Legal Obligations

The organization shall establish, implement and maintain a procedure(s) for identifying and accessing the legal and other EHS requirements and regulations that are applicable to it.

The organization shall ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its EHS management system.

The organization shall keep this information up-to-date.

The organization shall communicate relevant information on legal and other requirements to persons working under the control of the organization, and other relevant interested parties. FABTECH INTERNATIONAL LIMITED has established, implemented and maintained a procedure

- To identify and have access to the applicable legal requirements and other requirements to which our organization subscribes related to our HSE aspects, and
- To determine how these requirements apply to our HSE aspects.

FABTECH INTERNATIONAL LIMITED has ensured that these applicable legal requirements and other requirements to which our organization subscribes are taken into account in establishing, implementing and maintaining our EHSMS.

FABTECH INTERNATIONAL LIMITED has established all its HSE procedures to comply with the Local and Federal legal requirements that are applicable to specific areas of operations. Any changes in the local regulations are considered seriously and are updated accordingly. The updated information is communicated to all employees and other relevant interested parties.

FABTECH INTERNATIONAL LIMITED has kept its "Legal and Statutory Requirements" documents up to date as per the Local and Federal requirements. All associated copies of regulations, such as Local Orders, Administrative Orders and Guidelines etc. are kept in safe custody. These are available to all employees upon request.


**EHSMS-10 Legal & other requirements**

### 6.1.4 Planning of Action

FABTECH INTERNATIONAL LIMITED determined the controls and develops the action plan to achieve the intended outcomes of EHS Management system

FABTECH INTERNATIONAL LIMITED encourages its staff to participate in identifying hazards/ risks, HSE Aspects associated with work, involvement in incident investigation and review of EHS policy and Objectives.



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FABTECH INTERNATIONAL LIMITED also considers the technological options; financial requirements while planning actions and evaluate the effectiveness of the action taken at periodic intervals and availability of relevant resources.

## 6.2 EHS Objectives

FABTECH INTERNATIONAL LIMITED will be established smart objectives relation to its EHS management system performance.

The established objectives and targets must be:

- Consistent with the applicable policy
- Specific, Measureable, Achievable, Relevant and Time-Bound
- Monitored and updated.
- Effectively communicated to relevant parties.

### Action plan to achieve EHS objectives

When establishing, reviewing and updating smart objectives consideration is given to:

- Health and safety Factor
- Significant environmental aspects and risks/opportunities.
- Technological, financial and Operational and business requirements.
- Products and services provided to customers.
- The enhancement of customer satisfaction.
- Views of stakeholders.
- Legal and other requirements.

Smart objectives have been established, plans for achieving smart objectives and targets are established through KPI's.


Performance in achieving smart objectives is periodically monitored during Management Review meetings.

## 6.3 Planning of Changes

FABTECH INTERNATIONAL LIMITED determines and carries out the necessary changes of the EHS management system in the planned manner whenever required.

While planning for the changes in EHS management system consider the following;

- Purpose of the changes and potential consequences;
- Integrity of the EHS management system;
- Resource availability;
- Allocation and reallocation of the responsibilities and authorities.

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## **7.1 Resources**

### **7.1.1 General**

Top management determines and provides the resources necessary to implement, maintain and improve the EHS management system, including both internal requirements and resources required from external sources. Resource allocation is done with consideration of the capability and constraints on existing internal resources, as well as needs related to third-parties' expectations. Resources and resource allocation are assessed during management reviews. These include:

- People
- Facilities
- Suppliers and supplies

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- Infrastructure
- Work environment
- Operational Knowledge capture
- Natural resources
- Equipment

### 7.1.2 People

FABTECH INTERNATIONAL LIMITED has appointed the necessary competent person at various function and levels for the effective implementation of the EHS management system and for the operation and control of the activities.

### 7.1.3 Infrastructure

To achieve conformity to Service, FABTECH INTERNATIONAL LIMITED has assessed, established and maintains the necessary infra-structure in terms of:

- Furnished office space with required communication equipment.
- Workshop
- Modern and well-maintained process equipment
- Material handling equipment including Mobile Cranes, Forklifts, Gantry Cranes, EOT Cranes etc.
- Material storage facility
- Adequate support services such as transport, communication or information system etc.

### 7.1.4 HSE for the operation of process

FABTECH INTERNATIONAL LIMITED aims to foster a work culture and HSE that is professional, friendly and conducive to enhancing performance. Special attention is paid to adhere to the basic requirements and regulations regarding safety, cleanliness, noise, hygiene, light and ventilation in the work area. Furthermore, management ensures that any requirements critical to services are always provided.

The work environment is reviewed for adequacy and suitability for the existing and future requirements of the products in the management review meetings


### 7.1.5 Monitoring and measuring of resource

Inspection, measuring and test equipment (depending on the accuracy requirements) are identified and procured. If software is utilized, appropriate validation of the same is ensured. A master list of inspection, measuring and test equipment is maintained. Equipment calibration or verification as applicable is planned and performed at defined intervals. Traceability to National/International Standards is ensured.

Inspection, measuring and testing equipment are properly handled and stored. Wherever necessary, appropriate actions are taken for safeguarding the calibration settings against tampering. Whenever equipment is found out of calibration, the effect of the same on the previous inspections is assessed and appropriate action is taken and recorded.

Calibration status is indicated on the equipment by suitable means. Where it is not possible to indicate the calibration status on the equipment, the same is indicated through records. Records of calibration or verification as applicable are maintained. Where specified in the contract, technical data pertaining to inspection equipment is made available to the customer and/or consultant.

### 7.1.6 Organizational Knowledge

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FABTECH INTERNATIONAL LIMITED determines the knowledge necessary for the operation of its processes and to achieve conformity of products and services. This includes knowledge and information obtained from:

- Internal sources, such as lessons learned, feedback from subject matter experts, and/or intellectual property. Internal training programs are conducted to share knowledge across the organization and project teams.
- External sources such as standards, academia, conferences, and/or information gathered from customers or suppliers. Some of the mechanisms include: visits to principal's or manufacturer's factories; training conducted by principal for new products & technologies; public seminars by government bodies regarding new products, requirements etc.

This knowledge is maintained and made available to the extent necessary.

When addressing changing needs and trends, FABTECH INTERNATIONAL LIMITED considers its current knowledge and determines how to acquire or access the necessary additional knowledge.

Mentoring and shadowing is used for on-the-job training to transfer knowledge and to groom new managers.

FABTECH INTERNATIONAL LIMITED determines knowledge is important resource to carry out processes and achieve conformity of services. Knowledge is defined, maintained and made available according to the requirements.

## 7.2 Competency

FABTECH INTERNATIONAL LIMITED determines competence of personnel whose work affects conformity to product requirements, task that impact EHS performance and its ability to fulfill compliance obligations by: Determining the level of education, training, skills and experience required for each position.

### Identifying training needs:

The training needs are assessed annually during employee appraisal by keeping in view the future growth pattern of FABTECH INTERNATIONAL LIMITED, Process owners will identify and recommend the training need for the respective employees. Identification of training needs also to be considered to keep the employees of FABTECH INTERNATIONAL LIMITED with updated latest developments in their fields.


Following this, HR coordinates with the process owners & top management to prepare the training plan. The Training Plan shall identify training to be conducted in-house or externally.

## 7.3 Awareness Program

FABTECH INTERNATIONAL LIMITED top management establishes the process to provide Induction training and work-related training to all the staff to achieve conformity on their competence. Induction training will arrange for all new employees whose function affects EHS to attend induction training. Assistance on technical aspects may be sought from other relevant personnel whenever required.

Awareness training shall include the following:

- Introduction to the company's EHS Policy and EHS System;
- Awareness of significant OH&S hazards, HSE aspects and related actual or potential OH&S risks, HSE impacts associated with the work;
- Contribution to improve the effectiveness of EHS Management system, including benefits of enhanced EHS Performance;

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- Issue of relevant EHS system documents, compliance obligation where required;
- Information about the organization and internal rules;
- Introduction to job requirements, responsibility and authority;
- Introduction to staff and orientation to facilities;
- Identification of any required training.

Ref procedure: EHSMS-21 EHS related training, awareness and competency

#### 7.4 Communication

FABTECH INTERNATIONAL LIMITED has established a procedure for internal and external communication regarding the EHSMS.

The procedure has defined requirements for:

- Internal communication among the various levels and functions of our organization;
- Receiving, documenting and responding to communications from external interested parties.

FABTECH INTERNATIONAL LIMITED shall decide whether to communicate externally about its significant environmental aspects and safety hazards, and shall document its decision. If the decision is to communicate, then we shall establish and implement methods for this external communication.

##### Internal communication

Information related to the EHS management systems will be communicated internally via Emails, Safety Notices, Office meetings, Presentations, trainings etc.

FABTECH INTERNATIONAL LIMITED ensures the communication process is effective and enables the employees to contribute toward the continual improvement of EHS Management System.

##### External communication

Publications need prior approval of the Executive Director before publication.

Occupational safety, environment and incidents all report directly to the Top Management whom with direction from the Executive Director will liaise with relevant legal authorities.


Communication with authorities and the neighborhood in the event of emergencies will be carried out as per the guideless of the Executive Director.

Complaints from the neighborhood are handled by under the direction of the Executive Director.

Ref procedure: EHSMS-11 Communication, participation and consultation.

#### Communication Structure

What	When	With Whom	How	Who
<b>INTERNAL COMMUNICATION</b>				
HSE policy	Permanent	All Employees / Interested parties	Display / Letter / Website	Management/ Compliance

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Importance of effective EHSMS	As per Training plan / during Orientation training	All Employees	Training / Display	Human Resource/ Compliance
Responsibilities and Authority	During recruitment / Promotion / Department change	Employee	Procedure / Oral / Training	Management
EHS Objectives	While defining / Every month	All employees	EHS Objective Statistics	Compliance/ Staff Assistant
Customer complaint / Feedback	At the time of receipt	Department Heads, Higher Management is necessary	Meeting/ Internal Non conformance	Quality In-Charge/ Sales Representative
What	When	With Whom	How	Who
EXTERNAL COMMUNICATION				
Information to external providers	Placing purchase order / Quotation collection	Supplier (External provider)	Purchase order / Letter / Email / Oral	Purchase In-Charge
Product information	Enquiry stage	Customer	Email / Website / Catalogue / Letter	Sales Representative
Enquiry, order, amendments	Enquiry review / Order review	Customer	Email / Letter/ oral	Sales Representative
Customer feedback	Once in a year / After service	Customer	Forwarding customer feedback form	Sales Representative
Action taken for customer complaints	Once action taken	Customer	Email / Letter / oral	Sales Representative
Information to external providers	As agreed with customer	Customer	Purchase Order / Letter / Email	Stores In-Charge

## 7.5 Documented Information

### 7.5.1 General

The FABTECH INTERNATIONAL LIMITED management has established a well-documented EHSMS. The following is the documentation structure of the EHSMS

Tier	Description of document
Tier 1	HSE Policy
Tier 2	EHS Objectives
Tier 3	EHSMS Manual
Tier 4	EHSMS procedures
Tier 5	EHSMS Operational Control Procedures
Tier 6	Aspect Impact and Occupational health and Safety risk assessment and control registers
Tier 7	Legal registers

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Tier 8	Forms
Tier 9	Records

### 7.5.2 Creating and Updating

All revisions and amendments to this Manual is the responsibility of FABTECH INTERNATIONAL LIMITED Management Representative (MR) who initiates such actions and for approval by Executive Director. For any change or amendment, the revision number is incremented by one.

This document is circulated electronically in non- modifiable form and also in hard copy marked as Controlled copy” or ‘Uncontrolled Copy”.

The current revision status of the EHSMS Manual is indicated on the Revision History. The Master copy of the EHSMS Manual is controlled at Management Representative’s.

The master copy defines the current revision.

### 7.5.3 Control of EHSMS documents

The EHSMS documents are controlled. A documented procedure has been established to define the controls needed and the methodology of document control required: ----

- To review and approve EHSMS documents for adequacy prior to issue,
- To ensure that changes and the current revision status of EHSMS documents are identified,
- To ensure that relevant versions of applicable EHSMS documents are available at points of use,
- To ensure that EHSMS documents remain legible and readily identifiable,
- To ensure that EHSMS documents of external origin are identified and their distribution Controlled, and
- To prevent the unintended use of obsolete EHSMS documents, and to apply suitable identification to them if they are retained for any purpose.

Ref procedure: EHSMS-01 Control of Documents, EHSMS-02 Control of Records

## 8.0 Operational Planning & Control

### 8.1.1 General

The organization has identified and planned those operations and activities that are associated with the identified significant Environmental Impacts and Safety Hazard(s) where the implementation of controls is necessary to manage the EHS risks by

- a. establishing, implementing and maintaining documented procedure to control situations where their absence could lead to deviation from the HSE policy, objectives and targets, and
- b. Stipulating the operating criteria in the procedure(s), and
- c. Establishing, implementing and maintaining procedures related to the identified significant environmental aspects of goods and services used by the organization and communicating applicable procedures and requirements to suppliers, including contractors.
- d. Operational controls, as applicable to the organization and its activities; the organization shall integrate those




- e. operational controls into its overall EHS Management System;
- f. EHS Controls related to purchased goods, equipment and services;
- g. EHS controls related to contractors and other visitors to the workplace;
- h. Documented procedures, to cover situations where their absence could lead to deviations from the EHS policy and the EHS objectives;
- i. Stipulated operating criteria where their absence could lead to deviations from the HSE policy and EHS objectives

## Ref Procedures:

EHSMS-13	Operational Control for HSE
EHSMS-15	Work place HSE Inspections
EHSMS-16	Waste Management
EHSMS-22	Maintenance and calibration
EHSMS-23	Management of sub contractors
EHSMS -OCP-01	First aid procedure
EHSMS -OCP-02	Personnel Protection Equipment
EHSMS -OCP-03	Procedure for working at heights
EHSMS -OCP-04	Disposal of general waste
EHSMS -OCP-05	Resource conservation
EHSMS -OCP-06	Occupational Health Programme
EHSMS -OCP-07	Maintenance regime
EHSMS -OCP-08	Procedure for hot works
EHSMS -OCP-09	Fire Management
EHSMS -OCP-10	Lock out and tag out procedures



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EHSMS -OCP-11	Procedure for forklifts
EHSMS -OCP-12	Procedure for lifting
EHSMS -OCP-13	Procedures for Hazardous Substances / Materials
EHSMS -OCP-14	Procedure for Permit to work
EHSMS -OCP-15	Procedure for Working in Confined Spaces

### 8.1.2 Eliminating hazards and reducing OH&S risks

FABTECH INTERNATIONAL LIMITED has established, implemented and maintaining a procedure for eliminating hazards and reducing OH&S risks based on following hierarchy  
Elimination: removing the hazard; discontinuing the use of hazardous materials, applying ergonomic approaches when planning new workplaces.

Engineering controls/ work reorganization: isolating people from hazard; implementing collective protective measures (e.g. isolation, machine guarding, ventilation systems); addressing mechanical handling; reducing noise; protecting against falls from height by using guard rails; reorganizing work to avoid lone working, unhealthy work hours, workload.

Administrative controls including training: conducting periodic safety equipment inspections; conducting training on code of conducts; managing health and safety co-ordination with subcontractors' activities; conducting induction training; providing instruction on how to report incidents and nonconformities; managing a health or medical surveillance programme for workers who have been identified as at risk (related to hearing, respiratory disorders, etc.); giving appropriate instructions to workers (e.g. entry control processes, emergency); safety signs

Personal protective equipment (PPE): providing adequate PPE, including clothing and instructions for PPE utilization and maintenance (e.g. safety shoes, safety glasses, hearing protection, gloves).


### 8.1.3 Management of Change

FABTECH INTERNATIONAL LIMITED has established a process for the implementation and control of planned temporary and permanent changes that influence its HSE performance such as:

- New products, services and processes;
- Changes to work locations, working conditions, processes, procedures, equipment, or the FABTECH INTERNATIONAL LIMITED organisational structure;
- Changes to applicable legal and other requirements;
- Changes in knowledge or information concerning hazards and associated risks
- Developments in knowledge and technology

FABTECH INTERNATIONAL LIMITED will review the consequences of any unintended changes and will act to mitigate any adverse effects.

FABTECH INTERNATIONAL LIMITED maintains documented information describing the results of the review of changes, the person authorizing the change, and any necessary actions arising from the review.

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## 8.1.4 Procurement

### 8.1.4.1 General

FABTECH INTERNATIONAL LIMITED has established, implemented and maintaining a process to control the procurement of products and services ensure their conformity to its HSE management system.

FABTECH INTERNATIONAL LIMITED has established the necessary controls for all these externally into the real time practice. These controls will be implemented for all Products and service from external provider that to be incorporated into the FABTECH INTERNATIONAL LIMITED own products and service  
 Products and services that are directly provided to the FABTECH INTERNATIONAL LIMITED customer by external provider on behalf of the FABTECH INTERNATIONAL LIMITED.  
 Process provided by external provider.  
 HSE requirements that to be complied by external provider.

FABTECH INTERNATIONAL LIMITED has set and apply criteria for evaluation, selection, monitoring of performance and re-evaluation of the external provider, based on the ability of external provider to provide the HSE process, products and services in accordance with the requirements  
 FABTECH INTERNATIONAL LIMITED will maintain and retain all the documented information of the activities and records for the action taken from the evaluation of the external provider.

### 8.1.4.2 Contractors

FABTECH INTERNATIONAL LIMITED coordinates with its contactors in order to identify the hazards and to assess the risk arising from:

Contractors activity and operations that impact FABTECH INTERNATIONAL LIMITED,  
 FABTECH INTERNATIONAL LIMITED activity and operations that impact Contractors,  
 Contractors activity and operations that impact interested parties.

### 8.1.4.3 Outsourcing

FABTECH INTERNATIONAL LIMITED ensures the outsourcing (or sub-contracting) activities are controlled. Some of the out sourcing activities are:

- Maintenance of equipment and machineries
- Transport of finished products
- Calibration

HSE and legal requirements are communicated to the external provider to ensure their compliance. HSE officer provide induction training only after verifying whether the sub-contractors meet requirements.


### 8.1.4.4 Type and extent of control

FABTECH INTERNATIONAL LIMITED ensures that externally provided, products and services do not adversely affect our ability to consistently deliver conforming services to our customers. External provider's performance evaluated yearly once and vendors demonstrating inadequate performance will be required to implement corrective actions. Poor performing vendors will be replaced.

The details of the incoming inspection are recorded and test certificates, will be reviewed by the Concerned Department to verify its completeness and conformity with purchase order conditions.

An incoming material verification will be carried by comparing material supplied with specified purchase requirement.

## 8.2 Emergency Preparedness and Response

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Our organization has established, implemented and maintained a procedure:

- a) To identify the potential for emergency situations;
- b) To respond to such emergency situations.

FABTECH INTERNATIONAL LIMITED shall respond to actual emergency situations and prevent or mitigate associated adverse EHS consequences.

In planning its emergency response the needs of relevant interested parties, e.g. emergency services and neighbors are taken into account.

FABTECH INTERNATIONAL LIMITED periodically tests the procedure to respond to emergency situations, where practicable, involving relevant interested parties as appropriate.

During the Management Review meetings Emergency preparedness and response procedure is reviewed and where necessary revised. The review is also carried out after periodical testing and after the occurrence of emergency situations

Ref procedure: EHSMSMSP-017 emergency preparedness and response

## 9.1 Monitoring, measurement, analysis and evaluation


### 9.1.1 General

FABTECH INTERNATIONAL LIMITED monitor, measure, analyses and evaluate the HSE performance at periodic intervals.

FABTECH INTERNATIONAL LIMITED determines the products, areas and activities needs to monitor/ measure and methods of monitoring/measuring. The established procedure by FABTECH INTERNATIONAL LIMITED determines the Criteria to measure and evaluate the proactive measures of performance and reactive measures of performance of EHS management system. It also states when the monitoring/measuring activities to be performed and when the result of monitoring/ measurement shall be analysed.

Monitoring, Measurement, Analysis, and Improvement activities are implemented at FABTECH INTERNATIONAL LIMITED to demonstrate product conformity, quality system effectiveness and conformity, and continually improve the EHS system and our products.

Measurement criteria are identified in management reviews. Department heads are responsible for measurement and improvement activities within their department. Results from such activities are discussed in management reviews as well as departmental meetings.

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Monitoring and measurement of processes: FABTECH INTERNATIONAL LIMITED has suitable methods for monitoring and, where applicable, the measurement of the EHS management system processes. These methods demonstrate the ability of the processes to achieve planned results. When planned results are not achieved, correction and corrective action are taken, as appropriate, to ensure conformity of the product. FABTECH INTERNATIONAL LIMITED has developed systems that define the measurement methods used to evaluate process performance.

Monitoring and Measurement of product: To supplement the control and testing during the production process, there may be a finished goods control to ensure that products comply with the specifications, including possible requirements for packaging method. The control of finished goods must ensure a quick response to implement improvements of products or processes. Deficiencies and deviations according to specified requirements and the normal product quality shall be reported.

### 9.1.2 Customer Satisfaction

FABTECH INTERNATIONAL LIMITED has established a system of determination and monitoring of satisfaction and dissatisfaction of customer.

FABTECH INTERNATIONAL LIMITED monitors' customer satisfaction through continuous evaluation of customer suggestions and complaints and conducts a customer satisfaction feedback survey. Based on the survey report and customer feedback received, the nominated staffs prepare a report and submit it to the top management for review and discussion in the management review meetings. Trends in satisfaction and dissatisfaction are used for internal improvement. The effectiveness of measures implemented is periodically evaluated.

### 9.1.3 Analysis and evaluation

FABTECH INTERNATIONAL LIMITED analyses data to determine the suitability and effectiveness of the EHS Management System and to identify where improvements can be made.


FABTECH INTERNATIONAL LIMITED will collect data generated by measuring and monitoring activities and any other relevant sources.

FABTECH INTERNATIONAL LIMITED analyses applicable data to provide information related to:

- Internal audit;
- Performance and effectiveness of HSE including conformity of products and services
- Effectiveness of actions taken to address risks and opportunities, hazards and risks, environmental aspects and impacts
- Monitoring & measurement of process;
- Monitoring & measurement of product;
- Degree of Customer satisfaction;
- Performance of external providers;
- Non-conformities;
- Corrective / preventive actions;

Executive Director is overall responsible for the continuous improvement of processes through a structured approach of data collection, analysis and implementation of improvement plans.

## 9.2 Internal audit

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Procedures have been established to ensure that EHSMS activities throughout the company are audited at least once in a year. Audits are scheduled based on the status and importance of the activity. The procedures require that an audit schedule is established which includes all relevant activities both in the office as well as at sites. Audits are planned and performed by competent auditors. The procedure ensures that in all cases the auditor(s) will be independent of the function or area being audited.

All non-conformities discovered during audit are recorded and an audit report is prepared. The results of audits are communicated to respective managers who are responsible for timely implementation of agreed corrections and corrective actions.

Procedure requires that the implementation and effectiveness of corrective action is verified by a follow-up audit.

Findings of audits are presented and reviewed during management review meetings and improvement opportunities identified.

Reference procedure EHSMS-03: Internal Audit

### 9.3 Management Review

The top management of FABTECH INTERNATIONAL LIMITED reviews the organization's EHS 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 EHS management system, including the EHS policy and EHS objectives. Records of the management reviews are retained. Management Review meetings are carried out once in a year.


#### 9.3.1 Management Review Inputs

The agenda for Management Review Meeting shall cover the following as minimum:

- Actions from previous management review meeting
- Changes in external and internal issues that are relevant to the EHS
- Effectiveness of actions taken to address risks and opportunities, hazards and risks, environmental aspects and impacts
- Results of internal / external audit
- Non-conformities and corrective action
- Evaluation of company's performance improvement
- Recommendation for improvement
- Customers complaints
- View of interested parties / feedback
- Evaluation of customer satisfaction
- Effectiveness of internal / external communication systems
- Training needs & competence of staff
- Performance of external providers
- Adequacy of resources
- New legislation / regulation
- Consultation and participation of workers

#### 9.3.2 Management Review Outputs

Minutes of the meeting will form review output and shall be maintained and circulated to all attendants. The minutes will address decisions actions related to:

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- Opportunities for improvement
- Any need for changes to the EHS
- Maintenance of appropriate resources
- Changes in policy, SMART objectives

The Management Representative maintains minutes of the management review meeting.  
supporting procedure:

**EHSMSP18: Management Review**

**10.0 Improvement**

**10.1 General**

FABTECH INTERNATIONAL LIMITED have determined actively to seek out and realize improvement opportunities that will better enable the organization to meet customer requirements and enhance customer satisfaction. These shall include:


- Improvements in services to meet requirements as well as to address future needs and expectations
- Correcting, Preventing or reducing undesired effects
- Improving the performance and effectiveness of EHSMS

**10.2 Incident non-conformity and corrective action**

When nonconformity occurs, FABTECH INTERNATIONAL LIMITED:

Reacts to the nonconformity and, as applicable:

- Take action to control and correct it;
- Deal with the consequences, including mitigating adverse EHS impacts;

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Evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:

- Reviewing the nonconformity;
- Determining the causes of the nonconformity;
- Determining if similar nonconformities exist, or could potentially occur

Implement any action needed;

- Review the effectiveness of any corrective action taken;
- Update risks and opportunities determined during planning, if necessary
- Make changes to the EHS, if necessary.

Corrective actions are appropriate to the significance of the effects of the nonconformities encountered, including the impacts due to EHS issues.

FABTECH INTERNATIONAL LIMITED retains documented information as evidence of:

- The nature of the nonconformities and any subsequent actions taken;
- The results of any corrective action.

FABTECH INTERNATIONAL LIMITED ensure that corrective actions taken to eliminate the cause of nonconformities are appropriate to the magnitude and risks of nonconformities encountered. Documented procedure has been established and implemented at FABTECH INTERNATIONAL LIMITED


The Department managers will be responsible for the implementation of corrective action. Necessary changes to EHS documents, process / product specifications are carried out to ensure effective implementation which includes the following:

- Effective handling of customer complaints and reports of nonconformities.
- Investigation of the cause of nonconformities relating to HSE and recording the results of investigation.
- Determination of corrective action needed to eliminate the cause of nonconformities.
- Review the effectiveness of the corrective action is taken

FABTECH INTERNATIONAL LIMITED identifies response times for addressing corrective action.

### **10.3 Continual improvement**

Through the process effectiveness reviews, done as part of Management Review, FABTECH INTERNATIONAL LIMITED works to continually improve the suitability, adequacy and effectiveness of the EHS management system. This includes seeking opportunities for improvement.

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## EHSMS STANDARD PROCEDURE INDEX

Procedure ID	Title
EHSMSP 01	Control of Documents
EHSMSP 02	Control of Records
EHSMSP 03	Internal Audit of EHS Management Systems
EHSMSP 04	Control of Non Conforming EHS Practices
EHSMSP 05	Corrective Actions
EHSMSP 06	Preventive Actions
EHSMSP 07	Environmental Aspects and Impacts
EHSMSP 08	Hazard and Risk to Occupational Health
EHSMSP 09	EHSMS Objectives, Targets & Programs
EHSMSP 10	Legal & Other EHS Requirements
EHSMSP 11	Communications, Participation and Consultation
EHSMSP 12	Monitoring and Measurement
EHSMSP 13	Operational Controls for HSE
EHSMSP 14	Evaluation of Legal Compliance
EHSMSP 15	HSE Work Place Inspections
EHSMSP 16	Waste Management
EHSMSP 17	Emergency Response and Preparedness
EHSMSP 18	Management Review Of EHSMS and Continual Improvement
EHSMSP 19	Roles and Responsibilities for EHSMS
EHSMSP 20	Accident Incident Reporting
EHSMSP 21	EHS Related Training, Awareness and Competency
EHSMSP 22	Testing, Maintenance and Calibration
EHSMSP 23	EHS Management of Sub contractors
EHSMSP 24	Management of Change





OPERATIONAL CONTROL PROCEDURES

PROCEDURE ID	TITLE
EHSMS -OCP-01	First aid procedure
EHSMS -OCP-02	Personnel Protection Equipment
EHSMS -OCP-03	Procedure for working at heights
EHSMS -OCP-04	Disposal of general waste
EHSMS -OCP-05	Resource conservation
EHSMS -OCP-06	Occupational Health Program
EHSMS -OCP-07	Maintenance regime
EHSMS -OCP-08	Procedure for hot works
EHSMS -OCP-09	Fire Management
EHSMS -OCP-10	Lock out and tag out procedures
EHSMS -OCP-11	Procedure for forklifts
EHSMS -OCP-12	Procedure for lifting
EHSMS -OCP-13	Procedure for Hazardous Substances / Materials
EHSMS -OCP-14	Procedure for permit to work
EHSMS -OCP-15	Procedure for Working in Confined Spaces