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1 INTRODUCTION

Achieving excellence in occupational health, safety and the protection of the environment are foremost in Samic Srl. Our employees are our most important asset.

The prescribed procedure in this plan have been established to create a safe working environment, and a commitment to these safety philosophies is a top priority not only for managers and supervisors, but also for each employee.

The purpose of this Safety Plan is to describe how Samic will manage all HSE aspects of the project works. The occupational HSE plan represents the plan for conducting safe work, preserving personnel, property, and equipment. It will interface with statutory legislative requirements and individual contractor Safety Plans developed for the project.

Each employee on Samic is responsible for his own health & safety and for the people around him. It is therefore of greatest importance that each employee on this project fully understands all project HSE rules and standards.

This plan does not cover every aspect of safety or emergency response procedures. Special circumstances will arise that requires the correct judgment, experience and commonsense of each employee.

Your strict adherence to these plans and procedures are always required. This will assist and guide every Samic employee to achieve a target of no injuries throughout the project work.

This plan may be modified from time to time, as per the scope of project, changes in legislation, audit findings, design changes and in accordance with discussions during the regular safety meetings and consultation with Clients.

2 PURPOSE

The purpose of the plan is to ensure that all the actions to be taken prior to starting, during, and after completing the work are known to those persons who are required to carry them out to ensure that no human distress or financial loss is caused and protection of the environment is carries out.

3 DEFINITIONS

- o **Incident:** A work-related event or chain of events that has caused or could have caused damage, but without injuries or serious damage to the company or third parties.
- o **Accident:** An incident that has given rise to injury, ill health, or fatality.
- o **Lost Time Injury:** Any absence from work resulting from work-related Fatalities, Permanent Total Disabilities, Permanent Partial Disabilities and Lost Workday Cases.
- o **Restricted Workday Case:** A work-related injury or illness that partially or fully limits the ability to perform normal job duties for part of the workday.
- o **Medical Treatment Cases:** Require treatment by a medical professional, such as suturing cuts, applying special dressings, or removing foreign bodies from the eyes or soft tissue.
- o **First Aid Cases:** Occupational injuries that can be successfully treated by a qualified first aider and does not require further treatment by a medical professional.
- o **Competent Person:** Any person having the knowledge, training, experience, and qualifications specific to the work or task being performed.

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- o **Inspectors:** Qualified person/s appointed to conduct inspections and testing program.
Qualified and appointed persons to conduct inspections and testing program, with such theoretical and practical knowledge and experience of lifting equipment, capable of identifying defects and assessing their impact on safety.
- o **Contractor:** Any person engaged by Samic management to perform work for gain or reward other than an employee.
- o **Employee:** An employee refers to any personnel with direct roles of Samic.
- o **Lifting Equipment / Machine:** Is equipment, with its accessories, used at work to lift and lower loads. Lifting equipment includes cranes/overhead cranes, forklifts, pallet trucks, etc.
- o **Lifting Gears:** Equipment used for connecting a load to a lifting machine or appliance (also known as lifting tackle) and includes shackles, slings, hooks etc.
- o **Safe Working Load:** The maximum load as assessed by a competent person that an item of lifting equipment may raise, lower, or suspend under the particular service conditions. The safe working load is marked on the equipment and appears in the statutory records.

4 ABBREVIATIONS

- o SAMIC - Samic Srl
- o HSE - Health, Safety and Environment
- o EHSMS - Environment, Health and Safety Management System
- o ISO - International Organization for Standardization
- o ERT - Emergency Response Team
- o EAP - Emergency Assembly Point
- o MSDS - Material Safety Data Sheet
- o PPE - Personal Protective Equipment
- o SWL - Safe Working Load
- o ALARP - As Low as Reasonably Practical

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5 HSE OBJECTIVE AND TARGETS

Samic Srl is fully committed to preventing all injuries, occupational illnesses, material damage, environmental incidents, and financial losses. We also aim to restore the environment to its original state after each activity.

To raise awareness of Health, Safety, and Environment (HSE), we provide continuous training, information, and instruction to our staff, subcontractors, and workforce. We promote a positive safety culture and ensure a safe working system that identifies and reduces hazards and risks to the lowest reasonably practicable level.

Samic Srl is ISO 9001:2015 certified and operates in full compliance with these standards. Our motto is "Safety First", as we believe that no job is so important that it cannot be done safely.

We believe that all incidents, illnesses, and losses are preventable, and that strong HSE performance is part of effective management. The project will be carried out in full compliance with Samic's HSE Policy, workplace safety standards, and all applicable legal requirements.

Objectives:

- o Lead the industry in environmental, health, and safety (HSE) performance.
- o Treat HSE with the same importance as core business goals.
- o Design facilities and procedures to minimize risks and protect personnel.
- o Reduce environmental and public impact from our operations.
- o Ensure no work begins without all critical safety measures in place; suspend work if safety is compromised.
- o Continually improve HSE systems through audits and updates.
- o Assign only trained and competent personnel to all tasks.
- o Promote personal responsibility for safety and hazard prevention.
- o Encourage active participation in improving safety practices.
- o Provide necessary healthcare and rehabilitation support.
- o Share HSE knowledge within the company and with partners.
- o Require subcontractors and third parties to follow Samic's HSE standards.
- o Set and monitor clear HSE targets to track performance.

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6 GENERAL SAFETY RULES

- o Be aware of the location of fire extinguishers & fire assembly point. When the fire alarm is sounded all persons must assemble at the assembly point. Identify the emergency exits.
- o In case of any emergency, dial Security office telephone No. and give details.
- o Wear appropriate personal protective equipment at work. They save you from injuries.
- o Be cautious at work. Stay alert. Absent-mindedness creates hazards.
- o Do not be overconfident. Enquire in case of doubt.
- o Avoid hasty actions and horseplay at work.
- o Good housekeeping is crucial: keep sharp objects secured, don't leave tools where they can fall.
- o Do not operate any machine / vehicle for which you are not authorized.
- o In case of any injury, get first aid immediately.
- o Report all near misses / accidents / injuries immediately to SAMIC Safety office.
- o Keep your work area/camp/room clean and tidy.
- o Protect the environment as much as possible.
- o Fighting employees will be removed from the yard.
- o Those who are stealing materials from the yard will be removed from the yard.
- o Do not expose to Fumes, dust, gas, or other dangers from hazardous substances.
- o Possession use and sale of alcohol and drugs as well as entry to the SAMIC Yard under the influence of alcohol or drug are forbidden.
- o Tampering with Safety Equipment is forbidden

7 LEADERSHIP AND COMMITMENT

Samic Management recognizes that the responsibility for Health, Safety, and Environment does not remain within the HSE department alone but also lies with the Management, from the Executive Level to every level of the organization. SAMIC has clearly defined Roles & responsibilities for HSE Management through each individual job descriptions.

SAMIC Management & staff shall demonstrate a pro-active approach to Health Safety and Environment Plan & commitment to:

- o Ensure that the responsibility of HSE is shared at all levels, from entry level to executive level.
- o Actively involved in HSE Meetings, HSE Inspections & HSE Audits as per Project schedule.
- o Respond timely and effectively to HSE audit, inspection findings and Incidents/accidents.
- o Promoting positive HSE culture at all levels of the organization through recognition of achievements, effective communication, co-ordination, co-operation, and controls.
- o Seeking internal and external views on HSE issues.
- o Comply with all applicable legal, contractual, local, and international legislations as well as SAMIC EHSMS related activities.

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8 ROLES AND RESPONSIBILITIES

8.1 Chairman

The overall authority of Occupational Health and Safety Management Systems rest on him. He shall ensure Safety policy requirements are complied with at all functions and levels within the project.

He shall delegate his authority to various department managers and engineers to ensure Health and Safety policy requirements are established, implemented, maintained, and regularly review the effectiveness.

8.2 Project Manager

The Project Manager has overall responsibility for all HSE maintenance on the Project and specifically has overall responsibility for all HSE matters on the Project. The Project Manager's duties and Responsibilities are included as follows but not limited to:

- o Promote a positive safety culture and secure full commitment to the "Zero Accident" goal.
- o Ensure adequate resources are allocated for effective HSE program implementation.
- o Support and contribute to HSE initiatives as required.
- o Develop, review, and update the HSE Management Plan and related documents as needed.
- o Maintain clear communication on risks and safety concerns across all parties.
- o Ensure ongoing HSE training for planned activities.
- o Identify hazards and assess risks continuously to educate personnel and minimize exposure.
- o Plan and coordinate work to avoid risks to people and the environment.
- o Allocate sufficient time and resources to perform work safely and efficiently.
- o Ensure all subcontractors understand and comply with the HSE Management Plan.
- o Regularly review and update risk assessments and HSE documentation.
- o Maintain effective communication throughout the project team.
- o Provide a comprehensive security plan and arrangements.
- o Ensure PMT management knows legal and project HSE requirements with clear responsibilities.
- o Monitor subcontractor HSE performance continuously.
- o Maintain high standards of housekeeping, supported by unannounced safety inspections.
- o Encourage supervisors to discuss incident prevention regularly with their teams.
- o Actively participate in HSE meetings and site walkthroughs.
- o Maintain regular communication with HSE Manager and team on all safety matters.

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8.3 HSE Manager

- o Develop and implement the Project HSE Plan, ensuring its effective communication across the organization and subcontractors.
- o Establish priorities and a clear strategy for HSE implementation, updating the plan as necessary to reflect project changes.
- o Report HSE actions and outcomes to the Project Manager and participate in regular HSE meetings.
- o Provide supervision and guidance to personnel, encouraging the reporting of HSE concerns.
- o Offer technical advice on HSE-related issues.
- o Support project and production managers in implementing HSE procedures and standards.
- o Investigate incidents and fires, initiating follow-up actions and reporting findings.
- o Regularly review and update the HSE Plan, especially after organizational or operational changes.
- o Ensure compliance with legal HSE regulations, and enforce prompt accident reporting.
- o Promote HSE awareness among all project personnel and ensure participation in HSE programs.
- o Inform employees about emergency procedures and responsibilities.
- o Incorporate HSE instructions into daily operations and ensure compliance.
- o Take proactive steps to discourage risk-taking behaviour.
- o Advise the Project Manager on HSE matters.
- o Conduct or join management walkthroughs and prepare reports.
- o Ensure HSE procedures are regularly reviewed and improved.
- o Oversee HSE training and induction programs for all staff.

8.4 Production Engineers / Supervisors

- o Lead by example in HSE commitment for all teams and contractors.
- o Promote and support the “Zero Accident” goal.
- o Know and enforce client/vendor HSE policies and legal regulations.
- o Ensure staff follow safety rules, report accidents, and receive site-specific induction.
- o Communicate and implement the HSE plan; include safety in daily orders.
- o Enforce use of protective gear and safe equipment use; report defects.
- o Maintain safe, secure plant, tools, and equipment.
- o Support good housekeeping and safe work conditions.
- o Conduct risk assessments and prepare safety plans.
- o Assist in accident investigations and follow preventive measures.
- o Ensure permit-to-work and emergency response procedures are followed.
- o Enforce safety rules and ensure all workers get required HSE training.

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8.5 All Employees

- o Everyone is empowered to stop and correct unsafe acts or conditions.
- o Actively support the “Zero Accident” philosophy.
- o Know and follow HSE policies and individual responsibilities.
- o Take personal responsibility for safe behavior and work safely.
- o Learn and apply HSE procedures; report unsafe practices to supervisors.
- o Take reasonable care for personal and others’ health and safety.
- o Cooperate with employer to meet statutory health and safety requirements.
- o Do not misuse or interfere with HSE provisions.
- o Always use appropriate safety equipment and clothing.
- o Familiarize with the Project HSE Plan requirements.
- o Report all accidents and property damage to supervisors.
- o Suggest HSE improvements to supervisors and HSE officers.

9 TRAININGS

9.1 Internal HSE Trainings

HSE Manager shall organize to provide Internal HSE trainings as per the training matrix and evaluate the effectiveness of the training or action taken and retain associated records. HSE Manager shall ensure the availability and provision of a range of training seminars, workshops and programs on occupational health and safety issues. Internal HSE Training programs shall be continually modified to include evaluations from previous courses, future organizational requirements, and statutory/compliance obligations.

9.2 Third Party HSE Training

Mandatory Third-party training shall be provided for basic HSE issues of which all employees shall be aware. Key EHS training program requirements shall include:

- o First Aid Training.
- o Fire Fighting training.
- o Emergency Preparedness and Response training.
- o Safe Operational Practices for Operators such as Mobile Cranes, Forklifts, Tower crane.
- o Rigging & Slings
- o COSHH and Dangerous Goods Handling

10 COMMUNICATIONS

To achieve success in health and safety management, there needs to be effective communication up, down and across the organization. Samic shall adopt a variety of techniques such as displaying of posters, distribution of HSE information sheets, newsletters, and bulletins to generally promote the HSE of the Project.

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10.1 HSE Meetings

HSE meetings are an important way of reducing hazards by promoting HSE awareness among all levels of personnel through discussion. Subjects of consideration and discussions include:

- o HSE records and statistics.
- o Relevant incidents and accident analysis.
- o Improvement ideas.
- o To clear unsafe conditions and anomalies.
- o Training.
- o Emergency preparedness.
- o Permit to Work system.

Minutes of each meeting should be kept, and reports prepared as required.

HSE meetings should be held on a regular basis but extraordinary meetings may be summoned in cases of severe accident or when an incident has occurred, which could have led to an accident. Other persons may be requested to attend HSE meetings of their presence may be thought to be beneficial to the meeting as a whole.

11 HAZARD HUNT / OBSERVATION REPORTING PROGRAM

As a proactive approach, Samic has developed a Hazard Hunt Program for identifying those unsafe acts/conditions that are prevailing at work locations. This includes positive acts/conditions too that are in lined with the jobs/projects. These Hazard Hunt program helps us to identify the potential hidden hazards and associated risks by classifying and analyzing the various trends of it.

This program shall be expanded from a single project to multiple projects at the same time covering small-scale and large-scale business opportunities and as a program that helps anybody and everybody to identify and notify the potential hazard that are hidden anywhere in the premises of SAMIC. This program also gives the right and privilege to notify those potential hazards to oneself.

The development of this program shall be enhanced to that level as it reaches to the entire employees involved as well as sub-contractors, stakeholders, visitors, clients, and so on via various medium such as email notifications, monthly HSE meetings, daily Toolbox Talks, HSE committee meetings, Management Review Meetings etc.

Last but not the least, people shall be highly considered for the sort of Hazard identification being brought in via our HSE incentive scheme.

12 RIGHT TO STOP POLICY

Any activity that is being undergone is totally unacceptable and unsafe bringing up a situation that can worsen high enough to its people involved as well as the surroundings, every single individual shall have the right to stop those unsafe acts/conditions. At times these unsafe acts/conditions shall be of utmost severity that can even lead to lethality.

13 NO SMOKING POLICY

As a general health policy, Samic Srl management will make every effort to discourage smoking. Smoking in offices is strictly prohibited by the Company's Policy; specific areas will be dedicated for smoking. On the job yard, it will be a serious offence to smoke and stringent measure may be taken against violators.

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14 ALCOHOL AND DRUGS POLICY

No alcohol or non-prescription drugs will be consumed or used by any personnel on the SAMIC yard at any time. Those persons reporting for duty and believed to be under the influence of alcohol will be refused entry. Any person suspected of being under the influence of drugs or alcohol will be permanently removed from the project. It is the respective in charges responsibility to ensure all his employees are made aware of this requirement and to enforce compliance. Repeated non-compliance with this requirement will lead to the employers being excluded from any further tendering.

15 WELFARE FACILITIES

All office occupants and visitors will be required to use the common welfare facilities provided on each floor. Employees benefit from the welfare facilities provided in their respective work areas.

Rest and meal facilities: Adequately sized rest and meal facilities must be provided in accordance with DM EHS regulations and kept clean.

16 ACCIDENTS/INCIDENTS REPORTING AND RECORDING

16.1 Incident Notification and Reporting

- o Accident / Incidents to be reported within 24 hours of occurrence, same shall be presented and discussed in weekly progress meeting.
- o All Staff should be aware that their immediate Superior/Department Head or HSE Manager is to be informed immediately upon observance of an accident/incident.
- o Verbal form of reporting is considered sufficient provided that the responsible person fills in an Accident Incident Report.
- o All accident, incident or near miss and property damage must be reported.
- o The Department Head/HSE Manager shall ensure necessary First Aid Treatment/immediate measures are implemented to bring the situation under control.

16.2 Investigation Procedure

- o Contractor shall be invited in all incident investigation meetings.
- o The responsibility and authority for implementing, investigating, follow up and monitoring of corrective and preventive actions is assigned to the HSE Manager.
- o The concerned Department HSE MANAGER shall make an initial assessment of the incident as soon as reasonably practicable, once the immediate consequences have been dealt with.
- o The HSE Manager shall then decide upon the level of detailed investigation required.
- o The Accident/Incident form used for recording such deviations should contain all relative information and results of immediate investigation and subsequent detailed investigation.
- o The root cause of the accident/incident should be investigated, and corrective actions taken accordingly within 72 hours of the accident/incident.
- o If important lessons are discovered during an incident investigation that could help prevent similar events, they should be shared with the HSE Manager as soon as possible.
- o The HSE manager must therefore ensure that all incidents with a high potential for damage or loss are reported within 24 hours of their occurrence.

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16.3 Corrective Action

The HSE Manager is responsible for taking corrective action to eliminate the root cause(s) of identified accidents or incidents, to prevent the recurrence. Corrective action/findings are to be captured in the Action tracking register.

Examples of elements to be considered in establishing and maintaining corrective action include:

- o Recording any required changes in procedures resulting from the corrective action and Environmental aspects and impacts.
- o Application of additional controls or modification of existing controls, to ensure that corrective actions are taken and that they are effective.

17 FIRST AID

Samic shall provide an adequate number of suitably trained First Aiders and first aid facilities appropriate to their work activities potential risks and project location. Adequate and appropriate first aid provisions are based on the following criteria:

- o Number of employees.
- o Nature of the work.
- o Working hours.

It is the responsibility of the HSE Manager to provide access to suitable First Aid for all areas of work. Any person sustaining an injury however minor shall report to the supervisor, his name, details of injury and treatment.

Injuries requiring more than first aid attention shall be referred as directed by the HSE Manager, to a hospital. The victim may be transferred to the hospital by ordinary vehicle or in more serious cases an ambulance may be called.

Should the victim have possible spinal or head injuries he shall under no circumstances be moved. He shall be kept warm and as motionless as possible.

17.1 First Aiders

A first aider is a person trained and in possession of a current first aid certificate, issued by an organization or employer approved by the competent authority. The individual is required to undertake an annual refresher course and renew his certification every three years. The name of the rescuers and emergency numbers must be clearly visible, where applicable, on the HSE noticeboard.

17.2 First Aid Kits

Samic will provide first aid boxes in an adequate number and type, based on the number and distribution of staff. The boxes will be clearly marked (red cross on a white background or white cross on a green background) and placed in accessible places. The contents will be checked regularly by trained staff and replenished when necessary.

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18 RISK MANAGEMENT

The Fabrication Risk Management aims to identify hazards and evaluate the specific risks of each activity, indicating the necessary control measures, responsibilities and skills. Risk levels are assessed before the application of preventive measures, chosen to reduce risks to the ALARP level (“as low as reasonably practicable”).

During the process of Risk management, the contractor shall:

- o Address routine and non-routine tasks, emergencies, and outside influences.
- o Set up a way to find both immediate and long-term hazards and what they can cause.
- o Conduct hazard assessments during the design, operating and commissioning stages of equipment, processes, and facilities.
- o Control hazards and reduce risk to a tolerable level through mitigating measures.

Risk assessments must be carried out by the HSE manager with the engineer in charge before each new assignment and updated, if necessary, as follows:

- o If the process changes,
- o If personnel doing the task change,
- o After any incident, accident or near-miss,

Risk assessments serve to identify hazards and define control measures. The personnel in charge will be trained on the hazard assessment and identification process. Each risk will be assigned a score before and after the implementation of the control measures, which will be applied following the hierarchy of controls, from most to least effective:

1. Elimination
2. Reduction
3. Isolation
4. Control
5. Personal Protective Equipment (PPE)
6. Disciplinary Actions

PPE will only be used as a last resort and must be used in conjunction with another control measure.

All persons doing the task must be aware of the risk assessment and understand the control measures.

Refer: SAMIC “Documento di Valutazione dei Rischi” (Rev. 8 dated 30/12/2024)

19 COMMON H&S HAZARDS & PREVENTIVE MEASURES

The most common health and safety hazards anticipated are listed below. Specific hazards will be dealt with as and when they are identified.

19.1 Fire

- o Flammable and combustible materials must be stored away from heat, sparks, and open flame, welding slag or welding sparks.
- o Products of Combustion are Toxic – AVOID BREATHING THEM
- o Workers around HOT WORK operations shall take EXTRA precautions to ensure a fire hazard does not exist around the falling sparks.
- o Smoking is only permitted in designated safe areas.

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- o Combustible materials such as oil/thinner/paint rags shall be kept in containers and stored as per the MSDS. Copies of MSDS shall be available with all materials.
- o Persons will be trained in the use of firefighting equipment; a fire plan will be established and communicated to all workers and be displayed in prominent areas of the project.

19.2 Manual Handling

To avoid accidents by improper material lifting and handling, the workers are to be notified suitably by demonstration / posters displayed at all the working areas. Persons will be trained in all manual handling activities conducted in the workplace.

The key words in the poster are:

“Bend your knees; keep your back straight when lifting. Get assistance for heavy or bulky loads”.

The practical measures for avoiding manual handling injuries can include:

- o Avoid manual handling
- o Risk reduction
- o Automation and mechanization
- o Team handling & training
- o Smaller lighter loads
- o Selection of Individual and mechanical aids
- o Good environmental working conditions

19.3 Working at Height

A place at ‘height’ a person could be injured falling from it; even it is at 1.8 Meter or below.

Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 1.8 meter or more above a lower level shall be protected from falling using guardrail systems, safety net systems, or personal fall arrest systems, or other combination of fall protection.

19.4 Working in Confined Spaces

Confined space means a space that has any of the following characteristics:

- o limited openings for entry and exit.
- o Unfavorable natural ventilation.
- o Not designed for continuous worker occupancy.

Work in confined and enclosed space has a greater likelihood of causing fatalities, severe injuries. The key hazards associated with confined spaces are:

- o Serious risk of fire or explosion.
- o Loss of consciousness from asphyxiation arising from gas, fumes, vapor or lack of oxygen.
- o Loss of consciousness arising from an increase in body temperature.

Only enter a confined space if you are trained and when a permit to enter has been issued. Remain inside for as long as it is necessary to carry out the work.

A permit-to-work will:

- o Set out the work to be done, location and the precautions to be taken.
- o Predetermine safe methods of work.
- o Provide a clear record that all foreseeable risks have been considered.
- o Define the precautions to be taken and their sequence.
- o Issue written authorization specifying confined space entry, work start, and stop times.

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To enter or exit confined spaces, a tag system must be used, with an external sign showing identification tags and the relevant work permits.

The entry permit will be issued only after a competent person has carried out atmospheric tests and certified that the space is "safe for humans" and/or for work, indicating any conditions to be respected.

19.5 Welding and Gas Cutting Operations

All personnel must follow the prescribed Samic safety procedures for welding and gas cutting. To upgrade the standards while safeguarding against accidental fire and explosions the following safety procedures must be carried out:

- o Never weld or cut containers (drums, cans etc.) that have contained flammable substances until they have been cleaned, free of vapors/gases and tested.
- o In closed environments, check the air with a gas detector after each operational break.
- o Prevent waste or sparks from reaching combustible materials (e.g. insulation, wood, fabrics, flammable liquids).
- o Welding will not be allowed on any tank, pump or lines containing flammable liquids.
- o The welder must check the cables before use. Do not use repair tape. The cables must be removed and rolled up at the end of the work, avoiding tripping risks.
- o Vapors from arc welding can be dangerous: ensure ventilation and use proper respiratory protection as per Samic PPE procedure.
- o Wear clothing that covers the entire body against arc rays and hot metal.
- o Proper eye protection will be worn by both welder and helper.

19.6 Use of Gas Cylinders

- o Heat increases internal pressure, weakens cylinder walls and can trigger chemical reactions. Do not use cylinders as work supports.
- o All damaged or suspect cylinder must be returned to the supplier.
- o Do not roll or drop the cylinders; the valve protection cap must always be in place.
- o Regularly check for leaks with soapy solution; Isolate leaking cylinders in a safe area until they are empty.
- o Only the correct valve key must be used, which must be chained to the cylinder trolley.
- o Store cylinders away from direct sun, sparks, flames and heat.
- o Cylinders not in use must have the protective cap fitted.
- o Cylinders will never be used as rollers or supports, even if they are considered empty.
- o Never use oxygen for compressed air or for cleaning purpose.
- o Flash back arrestors must prevent the passage of the flame into the fuel gas supply system.
- o Union nuts and connections or regulators will be inspected before use for leaks or defects.
- o Inspect pipes for leaks, burns or wear; repair or replace before use.
- o Do not force connections. Always use suitable regulators:
 - Never exceed 15 PSI with acetylene.
 - Do not use oxygen regulators on combustible gases
- o Each Oxygen and Acetylene/LPG "regulator" must be fitted with a "flashback arrestors".

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Storage of cylinders:

Gas cylinders must be stored upright and secured with a belt or chain, both in the storage and work areas. It is preferable to use suitable trolleys to facilitate transport and possible removal in case of emergency. In permanent storage, gases must be separated according to what is indicated in the safety data sheets, and empty cylinders must be stored vertically and separated from full ones.

Oxygen cylinders must be stored separately from other gases and flammable materials, at a minimum distance of 20 feet (6.1 m) or isolated with a non-combustible barrier at least 5 feet (1.6 m) high, with a fire resistance of at least ½ hr. It is prohibited to store any cylinder in direct sunlight or in uncovered areas.

19.7 Angle Grinders and Abrasive Wheels

Injury can be caused by:

- o Violent ejection of fragments from a burst wheel.
- o Contact of hands with a rotating wheel.
- o Particles entering the eyes.
- o Using the incorrect wheel for the application, e.g. using a metal cutting wheel for grinding, using 7" wheels for 4" grinders etc.

There is a possibility of fourfold increase of stress in the wheel if the speed is doubled, thereby resulting in its bursting. Therefore, wheels must be fitted only by competent persons.

Operating Precautions

The wheels must be retained in position.

Adjustable guards and machine handle should be in position.

Ensure that the Maximum Speed (RPM) marked on the attachment (Disc/Wheel) is higher than the maximum speed (RPM) marked on the machine.

Stop control switch should be close to the machine and easily reached.

Ties, coat sleeves and unbuttoned overalls are easily drawn between wheels and must not be worn near the workplace.

Requirement of PPE's: Gloves must not be worn when using a rotating machine and every person provided with eye protectors shall use them at all times while he is in a place where there is a reasonably foreseeable risk of injury to his eyes.

A warning notice, stating - "Eye Protection must be worn when using this machine"- should be put up, close to each machine.

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19.8 Spray Painting

Spray painting may be one of the most effective ways of painting, but it has its own drawbacks as well during its use. Various paints, hardeners and solvents contain toxic chemicals which can enter the human body and cause harmful effects. Many paints are highly flammable, others are poisonous, and some are both flammable and poisonous.

The following precautions also to be observed while performing spray painting operations:

- o Read and understand the MSDS before work.
- o Paint indoors with proper ventilation.
- o Keep spray booths clean and dust-free.
- o Provide firefighting equipment; keep flammables away and no smoking.
- o Wash skin before eating; avoid nylon/plastic clothing.
- o Pour solvents carefully; wear gloves with toxic paints.
- o Use balanced spray guns and lifting devices.
- o Wear double-filter masks for fumes; use goggles if only dust masks.
- o Cover skin fully; use barrier cream on exposed areas.
- o Wear solvent-resistant gloves, safety boots, ear plugs, and helmet.
- o Stand on stable surfaces; stay in contact with safety personnel in confined spaces.
- o Equip pressure vessels with safety valves and gauges; certify compressors.
- o Guard rotating parts; dispose of paint containers properly.

19.9 Noise

Samic will conduct noise level surveys in areas with potentially hazardous noise exposure. These surveys measure sound levels at selected locations across the entire yard (workshops, painting/blasting sheds, machine shops, etc.) using a sound level meter to identify noisy zones. Surveys are performed twice a year and whenever machinery or procedures change affecting noise levels.

Refer: SAMIC "Valutazione dei rischi per esposizione dei lavoratori ai rischi derivanti da Rumorosità Ambientale".

19.10 Vibration

Samic shall ensure the risks from exposure to vibration, whether to hands and arms or to the whole body, are adequately controlled. Where employees are likely to be exposed to vibration at or above the relevant exposure action or limit values, measures, and adequate controls to ensure the risk of persons suffering harm from vibration is eliminated, minimized, or adequately controlled must be implemented.

Refer: SAMIC "Documento di Valutazione delle Vibrazioni Meccaniche".

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19.11 Hazardous Substances

It is the responsibility of the in-charges to eliminate hazardous substances or processes by design whenever possible; if not, risks must be properly managed and controlled.

The HSE Manager will ensure competent persons perform risk assessments covering safe use, handling, storage, and disposal of hazardous substances and by-products.

Works-in-Charge must provide adequate PPE to affected employees, including mandatory use of Material Safety Data Sheets (MSDS).

All hazardous materials must be stored in designated, clearly marked facilities considering risks to location, surroundings, and environment.

Contractors must have arrangements to manage spills, containment loss, or emergencies.

Workers handling hazardous materials must be properly trained and informed about health risks.

Hazardous materials must be distributed and handled only in properly designed, identified containers.

Temporary containers are strictly prohibited.

Refer: SAMIC "Documento di Valutazione dei Rischi per la Sicurezza e la Salute dei Lavoratori Derivanti dalla Presenza di Agenti Chimici Pericolosi".

19.12 Machine Operations

Machinery operations at Samic Srl are highly complex and require proactive controls to prevent injuries such as entanglement, hand and finger injuries, electrocution, and flying debris.

Preventive measures follow the ALARP principle, applying the most effective risk controls step-by-step to avoid accidents.

The following controls must be strictly followed during any machinery operation, regardless of the machine's size, sharpness, nature, or complexity.

ALWAYS:

- o have the necessary protective equipment, don't wear loose clothing, gloves & flapping sleeves near moving machinery;
- o report damaged or insecure guards to your supervisor immediately;
- o follow the instructions while using the machines. If you don't know, ask the concerned engineer. Learn how to stop your machine in case of an emergency;
- o pay attention to the job you are performing on the machine, do not be distracted by others;
- o ensure that the job is firmly clamped down before starting to cut machines such as drills, shapers milling machines etc.;
- o ensure that people are well clear before starting the machine;
- o use a brush or waste pan for removing waste materials;
- o keep the floor area around a machine clean and free from obstruction;
- o isolate power-driven plant before you attempt any maintenance on the machinery.

NEVER:

- o use machine unless the guards are in position and firmly secured;
- o reach or climb over machinery;
- o attempt to use your hands to slow down or stop a machine or shift a driving belt in motion;
- o clean or adjust machinery in motion, this may only be done by authorized attendants;
- o Request assistance in case you encounter a problem with the machine.

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19.13 Housekeeping

- o Poor housekeeping increases the possibility of accidents in many ways. E.g. fire, injury etc.
- o Workers must keep passages and stairs clear of materials and rubbish. If others are responsible, notify them through proper channels.
- o All equipment and materials must be properly stored to avoid tripping.

20 ELECTRICAL SAFETY & POWER TOOLS

Individuals working with electricity need have a combination of technical knowledge and experience to prevent danger. If they do not possess this, e.g. an apprentice, they should be adequately supervised. Adequate technical knowledge includes:

- o Knowledge of electricity.
- o Experience of electrical work.
- o Understanding of the system and practical experience of that system.
- o Workers must understand hazards, know precautions, and recognize if it's safe to continue work.

20.1 Use of Electrical Equipment

Electric shocks and injuries present a major hazard to workers using the electrical equipment in the course of their daily work. To minimize such risks, the Supervisor/Foreman shall ensure that:

- o All wiring is adequate and well insulated.
- o Proper equipment grounding is provided.
- o Fire hazards are checked.
- o Electrical Dangers Posters are displayed.
- o Suitable fire extinguishers are provided.
- o Damaged cables removed from yard.
- o Cables should not trail through wet areas.
- o Wire joints must be made using weatherproof industrial plug socket fixtures.
- o Tested periodically by a competent electrician with records maintained.
- o All electrical systems must be provided with ELCBs/GFCIs as per DM requirement.
- o Weekly electrical system checks to be done by the supervisor using check sheets provided.

20.2 Basic Safety Rules

- o Do not patch up; repairs must be carried out by electricians.
- o Stop and have the electricians repair/replace defective cables, plugs and sockets immediately.
- o Never "hot wire" fuses, get the proper rated fuse or check the machine.
- o Switch off immediately if the machine sparks.
- o Keep cables out of the way of damage. Avoid twisting, kinking, and binding cables.
- o Do not handle electric tools by the cable while disconnecting or working.
- o Electrical tools must be inspected every 3 months by a qualified electrician, with records kept.
- o Do not use tools near flammable vapors/gases.
- o Do not use any electrical equipment while standing in a wet area.
- o Do not use poor-quality/damaged extension leads to avoid electrocutions.
- o Do not use any scotch tape for splicing in the extension leads/cables.

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20.3 Adequate and Well Insulated Wiring

Electrical cables consist of one or more copper wires, which are normally stranded and surrounded by insulation. The purpose of the insulation is to prevent workmen touching live [charged with electricity] metal. Normally, protection is achieved by placing cables in metal/plastic conduits or covering them with the wire armor. Sometimes they are laid in metal trays.

20.4 Provision for Equipment Earthing

All external metal casings of electrical equipment and cables (including conduit) must be earthed to prevent the casing rising to a dangerous voltage if there is a fault. i.e. Short-circuit between the conductor and the casing, to conduct any current away by a safe path and to ensure that the faulty circuit is disconnected from the supply. RCD's will be used on all electrical boards.

20.5 Portable Electric Power Tool

All power tools and similar equipment used at the Samic yard shall be maintained in a safe condition. When power operated tools are designed to accommodate guards; they shall always be fitted with such guards to avoid contact with operatives and the creation of hazards.

21 LIFTING OPERATION

21.1 Training and Use

All the Rigging and Lifting activities shall be done by competent personnel certified by approved third party training companies.

The supervisors ensure that equipment is properly used that the operatives are suitably trained. Employees are obliged to only use equipment for which they have received training and how they have been trained.

The training of any individuals should consider:

- o Intended use of equipment and location of manuals.
- o Correct and incorrect usage, including risks of unsafe practices.
- o Understanding equipment markings and limitations.
- o Pre-use checks, including load and angle assessments, defect identification, and reporting procedures.
- o Proper attachment of loads, slings, and accessories.
- o Lift safely; complex lifts need a plan with diagrams.
- o Agreed signals for multi-person operations.
- o Common faults, withdrawal from service, and defect reporting.
- o Procedures after lifting, including safe transport and storage of equipment.
- o Proper storage methods and adherence to them.
- o The safe system of work and where to seek guidance if uncertain.

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21.2 Marking, Storage and Handling

- o **Marking:** Equipment which has been satisfactorily verified e.g. proof tested, load tested and has passed the subsequent thorough examination should be marked with:
 - Safe working Load.
 - An identification mark to facilitate periodic inspection and cross reference to other records.
 - Such other marks as are required by the standard being worked to and by legislation.

Should any of these become obliterated or ineligible the equipment should be withdrawn from use and referred to a competent person for re-verification and re-marking.

- o **Storage and Handling:** store equipment properly to avoid damage: keep storage areas dry, clean, and at a stable temperature. Organize lifting gear by type and capacity. Use bins and racks; only heavy items should be on the floor.

21.3 Inspection and Thorough Examination

- o **In-Service Inspection:** lifting equipment must be properly maintained and regularly inspected to ensure safe operation. Inspections between thorough examinations are legally required and should be scheduled based on usage, environment, and equipment history (visual check before each use). Equipment suspected of being overloaded must be withdrawn from service and retested before reuse.
- o **Third-Party Inspection and Thorough Examination:** all lifting equipment must undergo periodic thorough examinations by a competent third party. These examinations must be carried out at fixed intervals and properly documented, as required by regulations.

21.4 Maintenance

In general, requirement to maintain all equipment provided for use at work and of importance for lifting equipment, absolute and ongoing obligation can be met by the introduction of regular maintenance programs, the details of which should be recorded.

21.5 Safe Use of Lifting Equipment

The objective of good lifting practice is to ensure that any load is safe when lifted and is as secure in the air as it is on the ground. All lifting operations must be undertaken by suitably trained and competent personnel.

- o **Load Assessment:** determine the weight and center of gravity of the load in relation to the lifting points. Ensure the load on any equipment does not exceed its Safe Working Load (SWL).
- o **Lifting Method:** use proper slinging techniques with approved equipment only. Do not modify or overload gear.
- o **Slinging Practices:** ensure the load is balanced, stable, and does not shift unexpectedly during lifting. Use packing materials if needed to prevent damage to either the load or equipment.
- o **Support Stands:** use only approved stands, per manuals or procedures.
- o **Pre-Use Checks:** inspect all lifting equipment for visible defects before use.
- o **Load Control:** use tag lines or ropes—especially for long or awkward loads—to control rotation and movement during lifting.
- o **Landing Site:** prepare a suitable landing area that can safely support the load. Avoid areas with cellars, suspended floors, or underground services.

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- o **Load Readiness:** confirm the load is free of bolts, restraints, or tight seals before lifting. Secure or remove any loose parts.
- o **Communication:** ensure clear communication between the slinger and equipment operator—preferably via hand signals. One person must control the lift.
- o **Personnel Safety:** no one should stand under a suspended load. Keep all personnel clear of the lift zone.
- o **Test Lift:** initially lift the load a short distance to verify balance, stability, and security. Lower and adjust slinging if needed.
- o **Lowering the Load:** stop briefly above the landing site to stabilize the load and confirm alignment and clearance. Lower slowly and check stability before removing slings.
- o **Operator Awareness:** take care not to trap fingers or feet during placement. After landing, manually withdraw sling legs.
- o **Post-Lift:**
 - If no longer needed, return equipment to proper storage.
 - If to be reused, hook slings back onto the upper terminal fitting.

22 SPECIAL PROVISIONS

22.1 Signages

Standard type of signs & barricades will be used in Samic Yards.

- o **Prohibition Signs:** Background color shall be white with black symbol, centrally placed and red circular band, and crossbar. A minimum of 35% of the sign shall be red.
- o **Mandatory:** Background color shall be blue, with the symbol or text centrally placed. At least 50% of the sign shall be in blue.
- o **Warning:** Background color shall be yellow with a triangular warning symbol edged with a black band. The text or symbol shall be in black and centrally located.
- o **Safe Condition:** Background color shall be green with white symbol or text. The shape of the sign shall be square or oblong and green shall cover at least 50% of the sign.

23 PERSONAL PROTECTIVE EQUIPMENT (PPE)

Samic and its subcontractors shall provide all necessary Personal Protective Equipment (PPE) to workers based on job requirements, including safety helmets, boots, goggles, hearing and respiratory protection, harnesses, and confined space gear. Protective clothing, including coveralls, will also be provided and must be properly worn at all times.

PPE will be issued individually; no representative may collect equipment for others. Each worker must sign a receipt confirming they understand how, where, and when to use the equipment.

Safety equipment such as gas detectors, breathing apparatus, and harnesses must be regularly inspected, tested, and maintained. All checks shall be recorded in the Safety Equipment Register.

Refer: SAMIC "Documento di Valutazione dei Rischi (Rev. 7 dated 20/11/2023)".

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24 ENCOUNTERING EMERGENCY SITUATIONS

The emergency evacuation plan is designed to minimize panic and confusion in the event of a fire or any other emergency that requires the evacuation of all personnel from the site or building. All employees must be fully familiar with the procedures and respond appropriately in situations such as fires, earthquakes, or other disasters. The success of rescue and firefighting operations depends on teamwork and adherence to assigned responsibilities.

In the event of an incident, any Samic staff member who witnesses it must notify the nearest supervisor. After providing assistance and first aid (if possible), the supervisor must complete an incident report to be submitted to the relevant authorities. This report must be recorded in the incident logbook for future inspections or investigations.

24.1 Employee Emergency Response Expectations

Before an Emergency:

- o Take personal responsibility for your safety.
- o Know the emergency plan, exit routes, and the Emergency Assembly Point (EAP).
- o Know how to report emergencies or injuries.
- o Be aware of hazards in your area and how to respond.
- o Participate in drills and evacuation exercises.
- o Know the location of fire extinguishers and other emergency equipment.

During an Emergency:

- o Evacuate immediately using the nearest safe exit when the alarm sounds.
- o In case of an earthquake: drop, cover, and hold on.
- o Call 112 in life-threatening emergencies.
- o Follow instructions from authorized personnel or the Emergency Response Team (ERT).
- o Report to the Emergency Assembly Point (EAP).

After an Emergency:

- o Do not re-enter the building/site unless authorized.
- o If leaving the EAP, inform the responsible ERT member.
- o A full investigation will be conducted.
- o The site's Emergency Response Plan will be reviewed and updated if necessary.

24.2 General Evacuation Guidelines

- o When the alarm sounds, evacuate immediately via the nearest safe exit.
- o If safe, quickly take essential personal items; re-entry may be delayed.
- o Walk calmly, don't run. Use handrails and follow instructions.
- o If firefighters are coming up stairs, stay to the side in single file.
- o Proceed to the Emergency Assembly Point (EAP) and check in with the ERT.
- o Stay at the EAP until released by an authorized person.
- o Do not re-enter the building until officially instructed.

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24.3 Identification of Possible Emergencies

This emergency response plan includes the identification of all foreseeable emergencies and the specific response to each of these. Potential emergencies may include:

- o Natural disasters (earthquake, cyclones etc.).
- o Major spills
- o Major gas leaks (explosives, flammable)
- o Fire/ Explosion
- o Medical (heart attack, heat stroke, asthma attack, burns, cuts/lacerations, poisons).
- o Emergency in a Confined Space (Medical Emergency)
- o Emergency while working at Height (Medical Emergency / Suspension Trauma)

25 ENVIRONMENTAL MANAGEMENT

Samic shall prepare and maintain an Environmental Management plan to involve site management team of, and to encourage everyone on site to follow good environmental practices during the execution of projects to reduce the environmental impacts on surrounding environment and locality.

The main Objectives of this plan is:

- o To fulfil the requirements of Local/Legal requirements, SAMIC and Client.
- o To minimize the activity impacts on surrounding Environment.
- o To conserve natural resources.
- o Protecting ecological habitats and biodiversity within and surrounding the Site.
- o To raise employee's awareness on project for environmental procedures, environmental.
- o Impacts and employees' roles and responsibilities.

This Environmental Management Plan will provide practical guidelines to SAMIC employees and the sub-constructors, to implement environmental practices that minimize environmental impacts associated with work activity. This will cover procedures like management of:

- o Air emission.
- o Dust, water and noise pollution.
- o Solid and hazardous waste.
- o Illumination and ventilation.
- o Chemicals / Paint.

26 WASTE MANAGEMENT

Waste identification and classification will be undertaken by the EHS in co-ordination with the waste-producing section considering the following criteria:

- o Non-Hazardous waste
- o Hazardous waste

It is essential to correctly define the classification during the project phase to avoid the need for further segregation later. Subsequent waste handlers must be provided with an accurate description that enables proper management, including any specific risks, required precautions, necessary training and competencies, as well as, if possible, the names of the substances contained and safe handling procedures. Waste must be entrusted exclusively to authorized companies with proven experience and adequate infrastructure for transport and disposal.

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27 MANAGEMENT OF CHANGE

All aspects of change can impact Health, Safety, and Environment (HSE). This may occur due to design changes during the engineering phase, operational activities, construction modifications, equipment alterations, or organizational changes. Any change with potential HSE impacts must undergo a specific risk assessment.

The risk assessment should consider all hazards associated with the proposed change. Additional controls must be identified, if necessary, and incorporated into the risk register.

The recommendations from the risk assessment, along with the safeguarding measures, must be documented and reviewed to evaluate the potential impact on people, facilities, materials, the environment, and work procedures, ensuring that HSE requirements are fully met and standards are not compromised.

28 MANAGEMENT OF SUB-CONTRACTORS

Samic shall implement subcontractor management processes to control health, safety, and environmental risks arising from the activities of its contractors. These management processes shall include:

- o Sub-Contractor selection
- o Contractual Agreement
- o Coordination and Communication
- o Mobilization / Work in Progress
- o Monitoring Performance

28.1 Selection of Sub-Contractors

Samic Srl shall have a list of approved suppliers and sub-contractors who fulfil their requirements of EHS practices in addition to quality and commercial requirements:

When selecting new sub-contractors, the purchase manager shall

- a) Scrutinize the sub contractor's EHS systems for compliance to ensure that they have appropriate EHS resources and competence to complete the required tasks without risks to health and safety of our employees, trainees, and themselves.
- b) In making this assessment, Samic Srl shall consider the complexity of the scope of works to be completed and the level of risks involved.
- c) During this assessment, Samic Srl shall also check the sub-contractor's compliance to Italian rules & regulations.

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29 REFERENCES

- o SAMIC “Documento di Valutazione dei Rischi” (Rev. 8 dated 30/12/2024)
- o SAMIC “Valutazione dei rischi per esposizione dei lavoratori ai rischi derivanti da Rumorosità Ambientale”.
- o SAMIC “Documento di Valutazione delle Vibrazioni Meccaniche”.
- o SAMIC “Documento di Valutazione dei Rischi per la Sicurezza e la Salute dei Lavoratori Derivanti dalla Presenza di Agenti Chimici Pericolosi”.

30 REVISION DETAILS

REV. NO.	DATE	DESCRIPTION
0	16-01-2024	Issued for review

					
L	Issued for company review	M. Bonavita	S. Marvello	S. Marvello	18.Jan.24
Issue	Reason for Issue – Revision Description	Prepared	Checked	Approved	Date