# Environmental, Health and Safety (EHS) Plan

## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Introduction</td>
<td>3</td>
</tr>
<tr>
<td>1.1</td>
<td>Communication of Plan</td>
<td>3</td>
</tr>
<tr>
<td>1.2</td>
<td>Project EHS Objectives and Targets</td>
<td>3</td>
</tr>
<tr>
<td>1.3</td>
<td>Principle organisation involved in the Project</td>
<td>3</td>
</tr>
<tr>
<td>2</td>
<td>Organisation and Responsibilities</td>
<td>3</td>
</tr>
<tr>
<td>2.1</td>
<td>Organisation</td>
<td>3</td>
</tr>
<tr>
<td>2.2</td>
<td>Responsibilities</td>
<td>3</td>
</tr>
<tr>
<td>3</td>
<td>Existing Environment and Interfaces</td>
<td>5</td>
</tr>
<tr>
<td>3.1</td>
<td>Surrounding Land Uses, Hazards, Interfaces and Related Restrictions</td>
<td>5</td>
</tr>
<tr>
<td>3.2</td>
<td>Interfaces with the General public</td>
<td>6</td>
</tr>
<tr>
<td>4</td>
<td>Project Risk Assessment Design and Construction Material</td>
<td>6</td>
</tr>
<tr>
<td>4.1</td>
<td>Project EHS Risk Assessment</td>
<td>6</td>
</tr>
<tr>
<td>5</td>
<td>Site-Wide Elements</td>
<td>6</td>
</tr>
<tr>
<td>5.1</td>
<td>Access Control</td>
<td>6</td>
</tr>
<tr>
<td>5.2</td>
<td>Security</td>
<td>6</td>
</tr>
<tr>
<td>5.3</td>
<td>Induction</td>
<td>6</td>
</tr>
<tr>
<td>5.4</td>
<td>Minimum requirements for light vehicles on construction sites</td>
<td>7</td>
</tr>
<tr>
<td>5.5</td>
<td>Laydown and Storage area</td>
<td>7</td>
</tr>
<tr>
<td>6</td>
<td>Integrated Environmental, Health &amp; Safety Management</td>
<td>8</td>
</tr>
<tr>
<td>6.1</td>
<td>General</td>
<td>8</td>
</tr>
<tr>
<td>6.2</td>
<td>Legislation Applying to this Project</td>
<td>8</td>
</tr>
<tr>
<td>6.3</td>
<td>Training</td>
<td>8</td>
</tr>
<tr>
<td>6.4</td>
<td>Risk Assessment and Method Statements</td>
<td>8</td>
</tr>
<tr>
<td>6.5</td>
<td>EHS Audits and Inspections</td>
<td>9</td>
</tr>
<tr>
<td>6.6</td>
<td>Environmental, Health and Safety Meetings</td>
<td>9</td>
</tr>
<tr>
<td>6.7</td>
<td>Accident/Incident Investigations</td>
<td>10</td>
</tr>
<tr>
<td>6.8</td>
<td>Emergency Response and First Aid</td>
<td>11</td>
</tr>
<tr>
<td>6.9</td>
<td>Complaints</td>
<td>12</td>
</tr>
<tr>
<td>6.10</td>
<td>Client EHS Rules and requirements</td>
<td>12</td>
</tr>
<tr>
<td>6.11</td>
<td>Disciplinary Plan</td>
<td>12</td>
</tr>
<tr>
<td>6.12</td>
<td>Site Signs, Notices and Registers</td>
<td>13</td>
</tr>
<tr>
<td>6.13</td>
<td>Welfare</td>
<td>13</td>
</tr>
<tr>
<td>7</td>
<td>Site Environmental, Health and Safety Rules and Guidance</td>
<td>13</td>
</tr>
<tr>
<td>7.1</td>
<td>General Rules on Site</td>
<td>13</td>
</tr>
<tr>
<td>Section</td>
<td>Title</td>
<td>Page</td>
</tr>
<tr>
<td>---------</td>
<td>---------------------------------------------------</td>
<td>------</td>
</tr>
<tr>
<td>7.2</td>
<td>Housekeeping</td>
<td>14</td>
</tr>
<tr>
<td>7.3</td>
<td>Personal Protective Equipment - PPE</td>
<td>14</td>
</tr>
<tr>
<td>7.4</td>
<td>Hazardous Substances</td>
<td>15</td>
</tr>
<tr>
<td>7.5</td>
<td>Fire Prevention and Protection</td>
<td>15</td>
</tr>
<tr>
<td>7.6</td>
<td>Ladders and Steps</td>
<td>15</td>
</tr>
<tr>
<td>7.7</td>
<td>Barricading</td>
<td>16</td>
</tr>
<tr>
<td>7.8</td>
<td>Electrical Safety</td>
<td>16</td>
</tr>
<tr>
<td>7.9</td>
<td>Welding Cutting Grinding</td>
<td>16</td>
</tr>
<tr>
<td>8</td>
<td>Environmental Management</td>
<td>17</td>
</tr>
<tr>
<td>8.1</td>
<td>Main Contractor Obligations</td>
<td>17</td>
</tr>
<tr>
<td>8.2</td>
<td>Aspects and Impacts</td>
<td>17</td>
</tr>
<tr>
<td>8.3</td>
<td>National Legislation</td>
<td>17</td>
</tr>
<tr>
<td>8.4</td>
<td>Environmental Control and Monitoring</td>
<td>18</td>
</tr>
<tr>
<td>8.5</td>
<td>Control of Potential Spills</td>
<td>18</td>
</tr>
<tr>
<td>8.6</td>
<td>Waste Management</td>
<td>18</td>
</tr>
<tr>
<td>8.7</td>
<td>Ecology</td>
<td>18</td>
</tr>
</tbody>
</table>
1. INTRODUCTION

1.1. Communication of the Plan

This plan shall be included as a contractual document for all projects undertaken by Decko Ltd, any updates to the plan will be communicated through the normal project communication channels to all persons listed in the documents distribution list.

1.2. Project EHS Objectives and Targets

In line with its overall Health and Safety Policy Decko Ltd has established performance objectives and targets for the project. The primary objective for Decko Ltd is to prevent personal injury, damage to property and to promote the health and well being of all persons in the workplace to achieve the ultimate goal of “zero injuries and incidents”.

2. ORGANISATION AND RESPONSIBILITIES

2.1. Organisation

The EHS Management Organisational Structure shall be documented and shall be maintained. The organisational structure shall reflect the relevant function and the name of the responsible person regarding the various sections of the EHS Management Plan. The organisational structure shall be in the form of an organogram and will be displayed.

Specific EHS responsibilities and authorities shall be defined in a legal appointment that will be signed and dated by the required responsible persons and will be kept on file for review and evidence on site.

2.2. Responsibilities

2.2.1. Chief Executive Officer (C.E.O)

The Decko Ltd C.E.O is the head of the project and as such is the person overall responsible for the implementation of the Project EHS Plan.

Responsibilities
- To lead by example and demonstrate a high profile personal commitment to EHS for the duration of the Project, specifically:
  - Chair monthly EHS Committee Meetings
  - Undertake regular site EHS inspections
  - Accountability for the implementation of the Project Specific EHS Plan and for overall EHS performance on site.
  - Responsible for ensuring the Project Specific EHS Plan remains effective and relevant to the progress of the Project through regular audits and performance reviews whilst maintaining a focus on continual improvement.
  - Accountable for establishing appropriate standards objective and targets in relation to
EHS and employee welfare on the Project.

- Accountable for the provision of adequate resources, training, services and facilities to allow line managers to effectively fulfil their EHS responsibilities.
- Delegate authority and accountability to other managers for the safe operation of their areas of responsibility and compliance with the provisions of the relevant EHS legislation and the Project Specific EHS Plan.
- Accountable for ensuring provisions are in place and maintained for an acceptable level of response to emergency situations that may arise.
- Promote a culture in which EHS Management is the prime concern that will never be compromised.
- The Decko Ltd C.E.O will provide recourses to eliminate hazards.

When on site the Decko Ltd C.E.O will demonstrate commitment to the Project HSE Plan by participating in safety audits and other specific health and safety activities.

2.2.2. Construction Supervisors.
Reporting to the Decko Ltd C.E.O the Decko Ltd Supervisors and Team Leaders shall be responsible for the day-to-day operation of site activities and ensuring the dissemination of information passed down by Management to Decko Ltd Employees. These positions shall be responsible for safety at the workface ensuring that all activities are carried out in accordance with applicable country Legislation and Standards, Decko Ltd Project Specific EHS Plan and safe systems of work. These responsibilities shall include, but not be limited to the following:

**Responsibilities**

- To make a high profile personal commitment to safety for the duration of the Project.
- Ensure that all personnel employed are suitable for the jobs for which they have been recruited.
- Organise site/places of work, so that work is carried out to the required standards with minimum risk to Decko Ltd Employees, equipment and materials.
- Know the requirements of all-relevant Decko Ltd Safe Work Procedures.
- Give all Trades precise instructions on the responsibilities for correct safe work methods.
- Plan and maintain a tidy work environment, arranging for the removal of debris at timely intervals so as to maintain a safe work environment at all times.
- Ensure that all personnel under their control know what to do in the event of fire, gas leaks or other emergency.
- Prepare and complete all Incident Reports.
- Liaise closely with the Decko Ltd Site Manager, Site EHS Manager or other Supervisors on matters of safety.
- Incorporate safety instructions as part of routine orders and see to it that they are obeyed.
- Prevent Decko Ltd Employees from taking unnecessary risks or doing unsafe acts to obtain the Project objective of “Zero incidents and injuries”.
- Ensure that all new Decko Ltd Employees understand and comply with applicable legislation and the contents of the Decko Ltd Project Specific EHS Plan and safe work instructions.
- Organise and conduct suitable Training Sessions on a regular basis. These will be in
the form of daily Job Pre-Start and daily Toolbox Meetings.

- Conduct health and safety inspections, monitor safety behaviour on site and participate in audits.
- Ensuring that all involved personnel prior to commencement of any work complete a Risk Assessment and Daily Safety Task Instruction (DSTI). Then by a review process verifying that the development process is appropriate, communicated and understood by the users and subsequently complied with.

2.2.3. Decko Ltd Employees (and all other persons at a workplace)

All Decko Ltd Employees, have a personal responsibility for EHS. Decko Ltd Employees are encouraged to actively participate in all aspects of the Decko Ltd Project EHS Management System. The full involvement of all Decko Ltd Employees is vital to obtain the Project aim of “Zero incidents and injuries” at the workplace.

All Project Decko Ltd Employees are required to:

- Make and openly demonstrate a personal commitment to EHS for the duration of the Project and actively assist in creating a healthy and safe workplace;
- Accept responsibility for their own health and safety, and for that of their fellow workers who may be affected by their actions or omissions;
- Comply with instructions given in relation to workplace health and safety and environmental protection and to not adversely affect the health and safety of others;
- Not to interfere with, misuse or deface anything provided in the interests of health and safety and employee welfare;
- Use personal protective equipment and all safety devices correctly ensuring adequate training has been given to do so;
- After taking reasonable steps to protect the health and safety of any person who may be threatened, immediately report to his/her Supervisor any situation which could present a hazard and which cannot be immediately and simply rectified by the employee;
- Immediately report all accidents /incidents, near misses or dangerous events to their supervisor;
- Ensure they have sufficient training, knowledge or expertise to undertake tasks safely and competently and to seek further information and/or advice from his/her supervisor immediately if in doubt about the correct application of any work method or work process or any other matter pertaining to Health, Safety and Environmental compliance.
- Report for work in a fit and proper state, free from the effects of alcohol, drugs or other prohibited substances or fatigue;
- Attend and actively participate in health and safety initiatives, job safety observations, training sessions and meetings conducted for Project personnel.

3. EXISTING ENVIRONMENT AND INTERFACES

3.1. Surrounding Land Uses, Hazards, Interfaces and Related Restrictions

Employees must allow for and carry out a survey, employing detection equipment, to verify the location and status of all known underground services, prior to commencing any demolition, site clearance or earthworks where required. Measures must be taken
to disconnect, divert or protect all services as specified prior to commencing work. The purging of existing pipe work, tanks or plant containing hazardous substances must be carried out prior to stripping out, removal, dismantling, alteration or extension. Control measures must be established for safe systems of work and the safe disposal of purge effluent. An appropriate Risk Assessment and Method statement will be required for all work, and performed under a permit to work.

3.2 Interfaces with the General Public

Employees shall take all measures necessary to protect the general public from any risks arising from the construction works. Wherever possible, Contractors shall programme the works and sequences of operations to allow for the complete segregation of all construction activities from the general public. Where this is not possible the Contractor shall identify all known hazards and risks and take appropriate measures to control the risks e.g. provision of hoardings/ barriers, protection from falling materials, avoidance of uneven surfaces, adequate illumination.

4. PROJECT RISK ASSESSMENT.

4.1. Project EHS Risk Assessment

At the start of the project a Project EHS Risk assessment has been undertaken. This document outlines all specific risks associated with the project and is maintained and updated by the C.E.O and Appointed Risk Assessor for the duration of the project

Employees must perform and provide records risk assessments with respect to all hazardous materials and substances, including reference to manufacturer’s guidance and/or other specialist guidance / MSDS’s / Data sheets. Appropriate control measures must be employed to prevent or minimise exposure to all hazardous materials and substances, as far as is reasonably practicable.

5. SITE-WIDE ELEMENTS

The following common arrangements apply to all persons either working on or visiting Site.

5.1. Access Control

Decko Ltd will control all access to the site in accordance to ensure public safety. all visitors must report to the local Supervisor on entering an area and shall be accompanied at all times. The Supervisor shall inform all visitors of the procedures to be adopted.

5.2. Security

The objectives of these security procedures will be designed to ensure:
- Members of the public and unauthorised visitors cannot gain access to any site.
- No banned substance is brought onto the Site.
• Unauthorised removal of plant and equipment from any site is prevented.

5.3. Site Inductions and Training

All Decko Ltd Employees shall undergo induction as provided for and required before commencement of work on the Project Site (or on other places, if any, as may be specified under the Contract as forming part of the Site). Appropriate time must be set aside for training (induction and other) of all Decko Ltd Employees. Acknowledgment of receiving and understanding the induction shall be signed by all persons receiving this induction.

Decko Ltd Employees are responsible for their own health and safety and that of their co-workers within their working area. They shall be made aware of their responsibilities during induction and awareness sessions which include:

• Familiarising themselves with their work places and health and safety procedures.
• Working in a manner that does not endanger them or cause harm to others.
• Keeping their work area tidy.
• Reporting all incidents/accidents/occupational ill – health and near misses
• Protecting fellow workers from injury
• Reporting unsafe acts and unsafe conditions
• Reporting any situation that may become dangerous.
• Carrying out lawful orders and obeying health, safety and environmental rules.

Ensure that all Decko Ltd Employees undergo general work induction regard to the approved SHE Plan, general hazards prevalent on the Project Site (and prevalent at other places, if any, as maybe specified under the contract as forming part of Site), construction Risk Assessment, CLIENT EHS Rules and other related aspects.

Ensure that all Decko Ltd Employees and contractors Personnel undergo specific work induction with regards to the approved SHE Plan. The Contractor shall ensure that the Contractors Personnel are informed of and understand of the work to be performed, the specific hazards prevalent to the work performed and the control measures require mitigating such risks.

5.4 Minimum Requirements for any Light Vehicle on Site

• Vehicle must have a current road worthy certificate, be licensed and have insurance.
• Vehicle must have working headlights, tail lights, windscreen wipers and washers, windscreen must be clear of cracks which could obstruct the drivers view.
• The tyre tread depth must meet Kenyan requirements and be free of obvious damages, cuts and bulges.
• Seatbelts of every seat must be in good working order and free of cuts, tears or damages.
• The vehicle must not have any fluid leaks.
• Vehicles must be fitted with a working fire extinguisher and carry 2 x warning triangles (to be positioned front and rear in the event of an accident or break down)

No personnel shall be allowed to be transported on any work vehicles or on top of the
vehicles in any manner. Mobile working equipment’s, fire fighting and ambulance cars may not be used for transportation of personnel other than those uses for which the equipment is provided.

5.5. Lay-down and Storage Areas

When establishing storage areas, Decko Ltd shall consider the need to minimise the risk to Health, Safety and Welfare of both site operatives and members of the public, and shall also consider the need to maintain adequate access and egress to these areas.

6. INTEGRATED ENVIRONMENT, HEALTH & SAFETY MANAGEMENT

6.1. General

Environmental, Health & Safety Management has primary importance above all other considerations. Decko Ltd Employees shall be deemed to have made themselves aware of all current local EHS Legislation and the Employers/Host Site requirements and shall ensure that their Decko Ltd Employees implement established systems of work throughout the entire project.

6.2. Legislation Applying to this Project

The project Site shall compile and maintain a register of applicable Kenyan EHS Legislation. Occupational Health and Safety Act 85 of 1993 will be used as a minimum requirement.

6.3. Training

6.3.1. General Training
The C.E.O or nominee shall ensure that, where applicable, all personnel working on Site are suitably qualified and experienced for the tasks performed. Training shall be conducted and controlled in accordance with the training Matrix.

6.3.2. Induction Training
Induction Training on the site shall be carried on site, the following 4 types of training shall be provided with emphasis.

6.3.3. Toolbox Talks
Toolbox Talks are a means of providing structured interaction between Decko Ltd Employees and their supervisors /managers on EHS related issues. The Supervisor should explain and discuss EHS-related subjects and problems in a clear and concise manner so as to ensure understanding by all participants.

Toolbox Talks are a valuable tool to improve Decko Ltd Employees’ hazard awareness and to encourage safe work practices.
The short duration training topics include but not limited to:
- Identified manual handling /ergonomic risks and control measures related to site activities
• Personal Protective Equipment
• Housekeeping
• Etc. or alternatively may centre on a particular Accident /Incident.

The talks are intended to discuss EHS-related subjects and problems in a constructive fashion and not to conduct a fault finding or complaining exercise. Suggestions by all participants are actively encouraged. Meetings shall be conducted daily and attendance at these meetings is compulsory. Records of these meetings shall be maintained.

6.4. Risk Assessment and Method Statements

A risk assessment shall be conducted for all activities on the site. Method Statements shall be prepared and compiled for all activities and used as a baseline reference for all risk assessments compiled.

Decko Ltd Risk Assessments and Method Statements shall be submitted to the nominated Client Representative 14 days prior to the activity start or prior to the commencement of the associated activities. Decko Ltd shall maintain a register of all risk assessments and Method statements.

Note: Activities shall not commence until approval of Risk Assessments has been conducted and communicated to all employees.

6.5. EHS Audits and Inspections

6.5.1. EHS Inspections
All works and areas under the control of Decko Ltd shall be subject to routine inspections. This is in order to confirm and report on Decko Ltd.’s compliance with EHS requirements. The following inspections shall be conducted as a minimum.

• Area Supervisors Weekly Inspections
• C.E.O Monthly EHS Tour
• Routine Daily Surveillance Inspections

6.5.2. EHS Audits
A site audit schedule shall be prepared and the following audits shall be undertaken.

• Legal Compliance as per the Occupational Health and Safety Act and Regulations.
• Internal Self Audits.

6.6. Environment, Health and Safety Meetings

6.6.1. Site EHS Committee Meeting
This meeting shall be held monthly and shall be chaired by the Decko Ltd Site Manager, attendees shall be:

• Decko Ltd Managing Director.
• Decko Ltd Site Supervisor
• Decko Ltd SHE Representative/s.

As a minimum the Agenda must include:
• Initial identification of any specific health & safety issues (Risks)
• Initial identification of any specific environmental issues (Aspects)
• Setting and subsequent monitoring of site Objectives and Targets
• Review of any accidents and incidents that have occurred during the period
• Review and discussion over any changes to the EHS Plan
• Review of any Audits and Inspection including any outstanding corrective actions
• Highlighting any necessary training
• Discussion over any changes to legislation, international standards or Decko Ltd EHS Management System.
• Status of any disciplinary actions taken
• Implementation of the Site EHS incentive & disciplinary scheme.

6.7. Accident / Incident Investigation

The OHS act places specific duties on employers and Company 186 cc Employees with regard to reporting accidents/incidents and hazards and implementation of appropriate corrective/preventative actions.

If at any time Decko Ltd personnel observe any potential hazard/unsafe practice etc. being carried out by another employee and it is considered to be of a serious nature, the employee or contractor shall be requested to cease work immediately and may not recommence until agreed corrective action has been taken.

Details of the incident shall be recorded and appropriate documents completed that will indicated corrective action taken. The Decko Ltd C.E.O and Client point of contact shall be informed of the incident at the earliest opportunity.

In addition to their statutory obligations, the Decko Ltd Project EHS Plan places the following obligations on all managers, supervisors and Decko Ltd Employees.

**Managers and Supervisors are required to:**

i. Immediately notify the Decko Ltd C.E.O and Site Supervisor.
ii. CLIENT will be notified in line with their requirements as per the SHE Specifications.
iii. Take appropriate action as far as is reasonably practicable to eliminate or control any risk associated with a reported incident or known hazardous situation;
iv. Ensure accident/incident reports are completed and submitted.
v. Ensure a record of any work related injury to an employee is produced and maintained for a minimum period of five (5) years after the date of injury. This is required to ensure information is available regarding possible litigation over late claims;
vii. Prevent interference with or alteration of the scene of any serious accident/incident without approval from the Decko Ltd C.E.O and the Workplace Inspector.

**Individual Decko Ltd Employees**

Individual Decko Ltd Employees, on becoming aware of a hazardous situation or incident that could be a source of danger to them must:

I. Take reasonable steps to protect the health and safety of any person who may be
immediately threatened;
II. Immediately report the matter to the employer /supervisor or relevant Workplace SHE Representative or Manager.

6.7.1. Accident/Incident /Hazard Reporting and Recording
Decko Ltd are required to ensure their Decko Ltd Employees immediately report all accidents /incidents or hazards to their supervisors. All of the following should be reported:
- A hazard, near miss or dangerous event;
- Property or equipment damage;
- Physical injury or harm to health;
- A fire event.
- Environmental incidents.

All accidents and incidents shall be reported, investigated and analysed in accordance with the Accident and Incident Management Procedure and the following project specific criteria. When required by legislation the Department of Labour is to be notified of accidents and / or incidents.

Decko Ltd will ensure all accidents/incidents and major hazards/”near misses” are fully investigated by a full investigation panel which will include EHS staff and production staff that may have been involved with the occurrence or can deliver specific expertise advice. At least one of the team members will be trained in investigation techniques and coordinate the investigation process. These investigations will be reviewed by their Site Manager to ensure appropriate corrective and preventative actions are identified and implemented.

Decko Ltd Managers and Supervisors shall actively encourage their Employees to report all accidents, incidents and hazards. The Decko Ltd C.E.O will ensure the Client Representative is advised of the accident/incident as soon as practical following the occurrence. This may be performed verbally [telephone discussion/ face to face] or written [e-mail/ facsimile/ etc.]. Upon finalization of the investigation a copy of the report shall be provided to the Client Representative

6.7.2. Accident/Hazard Investigation and Analysis
Decko Ltd considers the uniform reporting and recording of all occupational injuries, ill health, disease and hazards and the collection, recording and analysis of data concerning these events, essential in determining and identifying:
   i) Measures that need to be taken to prevent similar occurrences.
   ii) Selection of correct priorities for preventative action.
   iii) Evaluation of the effectiveness of these controls and preventative measures.
   iv) Statistics of accidents / incidents shall be reported.

6.7.3. Follow up on Corrective Actions
Following completion of Accident/Incident or hazard investigations the Decko Ltd management will initiate a follow up action review of the investigation.

The Decko Ltd management may nominate the respective Site Supervisor to follow up
on the status of the nominated corrective/preventative actions proposed in the investigation to ensure the accident/incident or hazard has been properly dealt with and the risk of recurrence minimized or eliminated.

Once all nominated corrective/preventative actions have been implemented, the Accident/Incident or Hazard Report will be closed out and filed at the Decko Ltd Office.

6.8 Emergency Response and First Aid

6.8.1. Emergency Procedure
A site-specific emergency procedure shall be produced prior to the commencement of site operations. This shall be communicated to all personnel via the Site Induction Training. An emergency situation may involve:

- Fire
- Flooding
- Explosion
- Bomb Threat
- Malicious Acts
- Pollution
- Fuel Leak
- Medical Emergency
- Natural Disasters (e.g. earthquake, hurricane, high winds etc.)
- Police Assistance
- Terrorism
- Other

An onsite emergency response team will be established. External emergency services will be utilized to support the emergency response team, as their responsibility will be to stabilize the emergency until external assistance arrives.

External training providers, if required, will provide other specific emergency response training.

6.8.2. First Aid
The First Aid box shall be easily accessible and will have the necessary equipment available as per the OHS Act 85 of 1993:

First Aid kit’s containing bandages etc. shall be located in appropriate areas. The location of all first aid stations on site shall be clearly marked with appropriate signs.

The provision of First Aid response and facilities is the responsibility of the company.

6.9. Complaints

Complaints may be received from internal or external sources and may be in written or verbal form. The Decko ltd C.E.O or nominee shall be responsible for ensuring a complaints process is established commensurate with site specific details such as location, sensitivity, distance form nearest communities etc. As a minimum all
complaints shall be logged and appropriate corrective action initiated.

6.10. Employers EHS Rules and requirements

Will be discussed with employees, these sessions will be documented and attendees will sign acknowledgement that they have attended these sessions.

6.11. Disciplinary Plan

The Decko Ltd policy for all Decko Ltd Employees, direct hire Decko Ltd Employees, contract hires, technical field advisors and all commissioning and Contractor personnel, associated with this construction project are required to follow Decko Ltd environmental, health and safety policies and operating procedures. This policy provides reasonable guidelines to enforce disciplinary action.

Workers will be provided with the required training and information, or re-training to maintain their knowledge.

Decko Ltd reserves the right to discharge “at will” workers who are observed performing work in an unsafe manner that would endanger either themselves or another worker. Such workers shall be subject to disciplinary action up to and including termination. The Decko Ltd Site Supervisor will consult with C.E.O to determine the course of action appropriate to the circumstances. The steps to be taken, at a minimum, may include the following depending on the severity of the actions:

6.11.1. Verbal Warning
As the first step in correcting unacceptable behaviour, the employee’s immediate supervisor/foreman will review the pertinent facts with the worker. They will consider the severity of the problem and the worker’s past performance. A verbal warning will be issued to the worker, which will be documented by the supervisor and copies distributed to the worker’s personnel file.

6.11.2. Written Warning
If the unacceptable performance continues, the next step shall be a written warning. The written warning shall clearly state the policy that was violated and the steps the worker must take if it is to be corrected. A written warning will be issued to the worker, which will be documented by the supervisor and copies distributed to the worker’s personnel file.

6.11.3. Suspension and/or Termination
Examples of conditions for termination:
Wilful Misconduct - a wilful disregard for the safety and well-being of themselves or others includes Decko Ltd property.
Repeat Violations – Repetitive violations are subject to termination
Serious Violations of Policy – Any violation of Commissioning Safety Rules, Fall Protection, Drug/Alcohol related incidents, and acts or threats of violence are examples of grounds for immediate dismissal.
6.12. Site Signs, Notices and Registers

The following rules shall apply on site:

- Employers must maintain records of all employees and visitors on Site.
- All statutory registers, notices, records and certificates etc. must be made available for inspection, at any time, for the purpose of EHS audits and inspections.
- EHS signs and notices shall be written in the local language and English. These posters and signs shall be prominently displayed and complied with the Kenyan regulations.
- EHS signs and posters shall not be replaced or removed without permission.

6.13. Welfare

Drinking Water

- Conspicuously marked with appropriate signs where necessary for Health reasons;
- Provision of drinking vessels or other suitable method of drinking.

7. SITE ENVIRONMENTAL, HEALTH AND SAFETY RULES AND GUIDANCE

7.1 General Rules on Site

- All Site-based personnel and visitors to Site must ensure that suitable PPE is worn at all times whilst on the construction site. The wearing of Safety Footwear and High Visibility Jackets is compulsory. Additional PPE must be worn appropriate to the location and task being performed.
- Smoking and eating is prohibited throughout the workplace except in designated areas.
- No alcohol is to be taken onto or consumed on site. Any person found in possession of or under the influence of controlled substances (except where prescribed by a doctor for medical reasons) or alcohol will be immediately removed from site.
- Give consideration to start and finish times when in close proximity to residential areas.
- Adequate internal and external lighting shall be provided for all workspaces.
- All portable electrical equipment shall not exceed 240 volts excluding portable welding sets.
- Instructions given on safety signs must be adhered to at all times.
- Open fires on Site are prohibited.
- Where required, any person working on or near operational plant or equipment must first be competent and trained in such work.

7.2. Housekeeping

Decko Ltd Site Supervisor shall conduct housekeeping inspections of their respective work, storage or lay down areas frequently (minimum twice daily) taking corrective action immediately where necessary.

The following rules for housekeeping shall apply on Site:
• All scrap, construction waste and packing material shall be brought to specially designated areas. This waste will be collected from these areas for disposal on a daily basis.
• The accumulation of waste is prohibited.
• Individual work sites shall be reasonably clean at all times.
• Tools, timber and other building materials shall be kept out of the way so not to cause tripping hazards.
• Timber with protruding nails and other similar hazardous conditions must be dealt with promptly and removed from site.
• Empty wooden boxes shall be removed from construction area to the designated dumping area on a regular basis but not less than once a day.
• Each employee shall leave his or her workplace in a clean and safe state on the completion of the task and at the end of each shift.

7.3. Personal Protective Equipment (PPE)

It is the responsibility of each employee on site to provide adequate and well maintained PPE it is also the responsibility of each Contractor to ensure sufficient training is provided to ensure correct and proper use of such equipment.

The following PPE is mandatory on this site at all times, failure to comply with the below rules may result in disciplinary action:
• Protective footwear
• High visibility clothing or Vest

In addition to the above the following will also apply: Workers involved in hot works such as, welding, burning and grinding will also be required to wear appropriate eye/face/hand/head/body protection and gloves/gauntlets where necessary.

Workers working under noisy conditions must also be provided with and required to wear appropriate ear protection.

Workers at heights with insufficient barrier protection must be provided with and required to use harnesses and lifelines. Failure to do so may result in disciplinary action.

When working with toxic gases and liquids, ceramic fibres etc. or when working with dangerous formation of dust, appropriate protective clothing and respiratory equipment must be provided and worn in accordance with the regulations that apply for this kind of work.

7.4. Hazardous Substances

This section describes the minimum procedures to manage the level of risk and ensure the safe management of all hazardous substances and dangerous goods bought onto or used on the Decko Ltd Project site.
The transport, storage, use and disposal of these substances will be in accordance with legislative requirements.

- A Risk Assessment is to be completed prior to the use of all hazardous substances on site.
- Exposure to hazardous substances shall be in accordance with recognised Workplace Exposure Guidelines and shall be kept as low as is reasonably practicable.
- Where a less hazardous substance is available, a review will be initiated to determine if this product can be substituted for the less hazardous product.
- All relevant information including a current Materials Safety Data Sheet (MSDS) shall be provided to the Decko Ltd Site EHS Manager for inclusion in the Site Hazardous Substance Register.

**Under no circumstances is any product, designated hazardous or otherwise, allowed to be bought or used on the Project if the appropriate controls cannot be implemented and exposure to the substance cannot be reduced to below the National Exposure Standards.**

### 7.5. Fire Prevention and Protection

Decko Ltd recognize a system of fire prevention and a fire protection is needed that will minimize the risk of a fire starting and then minimize injury and illness should a fire occur. Routine checks and maintenance shall be conducted on all fire suppression /protection systems and equipment as per the regulatory standards. Registers shall be kept of all such maintenance and inspections.

### 7.6. Ladders and Steps

The following are minimum guidelines in relation to the safe use of ladders:

- Only ladders that are whole and in a safe, undamaged condition and of approved construction shall be used on site. Checks shall be conducted at a minimum every three months to ensure hinges; steps, restraining cords, ropes and stays are in good condition.
- An appropriately coloured tag complying with the Project colour coding guidelines shall be applied in a conspicuous location.
- Metal ladders and steps shall not be used in connection with electrical work or where contact may potentially be made with live current.
- Ladders and steps shall be used on a firm level surface free from obstructions and with clear access /egress.
- All ladders must be fitted with safety feet.
- Once elevated, all ladders shall be secured with lashing. An assistant shall hold the ladder steady until secured.
- Ladders shall extend at least one metre beyond the edge or landing point.
- Ladders shall be positioned or reared at the correct angle – 300mm out for every 1200mm rise (ratio of 4:1).
- Wherever possible, steps shall be used in the fully opened position.
- Workers shall not overstretch from a ladder or step. Shift the ladder to a more convenient position. Both feet and one handhold should be on the ladder at all times when conducting work.
• Do not stand on the top of a stepladder to conduct work.
• Routine inspections of ladders shall be recorded in the appropriate register.
• Ladders shall not be used as working platforms.

7.7. Barricading

All barriers or barricading used on the project shall be of a suitable material, strength and height sufficient to perform the task required of it. Where there is a risk of fall of over 1.2 metres then rigid barriers must be used.

Floor openings, stairwells, platforms and walkways, and trenching where a person can fall any distance shall be adequately barricaded and where necessary, well lit.

Barricades may also be used to prevent personnel entering an area where risk of injury is high e.g., during overhead work activity or electrical testing etc. Such barricading must provide clear visual warning and be of contrasting colours. The reason for the barrier shall be attached by means of a tag or label.

Where possible barriers shall be placed at least one meter from the edge of an open trench or excavation.

7.8. Electrical Safety

An employer has an obligation to ensure the employer's business or undertaking is conducted in a way that is electrically safe. This includes identifying electrical hazards, assessing the risk of injury or property damage that may be attributed to hazards and taking necessary actions to minimise exposure to the risk through the development, implementation, and continuing to ensure safe systems of work.

7.9. Welding Cutting Grinding

This work will be covered under a hot work permit.

In summary the following precautions must be observed:
• Only qualified, suitably trained and approved personnel shall carry out welding.
• When conducting welding, oxy-acetylene cutting and grinding operations in elevated areas fireproof blankets shall be used to arrest sparks, reduce the risk of fire, and to protect surrounding structures.
• When welding is being carried out at ground level welding screens or / and blankets are to be used to minimise sparks and the risk of fire, and to protect nearby workers from flash or penetrating eye injury.
• If there is a potential for the outbreak of fire, consideration should be given to the use of a firewatcher.
• Fully operational fire extinguisher shall be accessible within easy reach of the hot work area.
• Welding equipment shall be inspected before use and shall be in good condition
• Flashback arresters shall be fitted to oxy-acetylene units at the regulator. Flashback arresters shall also be fitted at the torch end if long hoses are being used.
• Welding shall not be carried out without appropriate PPE. i.e. Welding shield, safety glasses, dry welding gloves, apron and spats with long sleeve overalls and long trousers. A comprehensive generic safe work procedure should be in place and the procedures to be followed well understood by those required to carry out welding, grinding and cutting operations.

Note: The use of hand held angle grinders is considered to be a high-risk activity on the project due to the high potential for very serious injuries. All staff are expected to limit the use of this type of equipment wherever possible and to ensure appropriate safe work procedures are developed, used and monitored whenever this equipment is used.

8. ENVIRONMENTAL MANAGEMENT

8.1. Main Contractor Obligations

All aspects of environmental management associated with the construction works shall be the responsibility of Decko Ltd. This encompasses all stages of construction from pre-construction planning through to the construction works, commissioning and final hand-over to the Client. This includes ensuring that all necessary licences and/or consents are obtained for the construction works from the relevant authorities, including those for temporary activities and discharges. Construction works shall be conducted in such a way as to minimise any adverse environmental impacts of those works throughout their duration. The following sections represent the minimum requirements and procedures required of all during the construction works. Decko Ltd shall comply with all relevant Laws, environmental legislations, regulations and employer policies and procedures.

8.2. Aspects and Impacts

Aspects and impacts for the project have been defined; these shall be reviewed at the Site EHS Committee meeting.

8.4. Environmental Control and Monitoring

There are a number of specific environmental issues to be considered during the Project:

- Noise and Vibrations
- Pollution
- Emissions and Discharges
- Fuel and Chemical Management
- Energy Management
- Waste Management
- Control of potential spills
- Ecology

8.4.1. Construction Noise and Vibrations
The general objective for the management of potential impacts in respect of noise and vibration shall be to control and limit noise and vibration levels from construction activities at source, by the use of Best Practicable Means (BPM) (e.g. by careful selection of plant, maintenance and location of plant, construction Methods and programming, use of noise barriers/screening), ensuring compliance with relevant legislation.

8.4.2. Atmospheric Pollution
During construction activities the principal considerations in respect of atmospheric pollution involve potential dust nuisance and the release of other air pollutants associated with aerial emissions. The general objective for the management of potential impacts in respect of atmospheric pollution shall be to carry out the works, so far as is reasonably practicable, to minimise emissions to air of dust and other pollutants, including odour, in accordance with appropriate legislation and Decko Ltd guidelines.

Employees shall take all reasonable steps to avoid the creation of dust nuisance by making provision for;

The screening, enclosure and spraying of stockpiles of soil, rubble and construction materials, especially in dry, windy conditions

Damping down soil/other materials before depositing

Ensuring that adequate sheeting is provided on each spoil load to prevent spoil falling from HGV's

Employing dust controls for "special operations" for example, when using crushing or screening plant, demolition activities and concrete mixing operations

Sealing and/or vegetating completed earthworks as soon as possible after completion

Liaise with the relevant authorities, as necessary

8.5. Fuel and Chemical Management
It is Decko Ltd.’s responsibility to ensure that all hazardous chemical substances on site are controlled in accordance local regulations.

8.6. Control of Potential Spills
Wherever possible, efficient use of energy use shall be encouraged through appropriate instruction and training of personnel. Portable electrical equipment shall conform to health and safety legislation with respect to efficiency and testing. Trained personnel shall be expected to work efficiently to minimise the use of fuel gases. Diesel Generators shall also be used as efficiently as possible.

8.8. Waste Management
All waste on site shall be managed in accordance with local regulations and the Client requirements.

Carry out investigation of waste control routes to ensure that it is being disposed of in a correct and appropriate manner.

8.8.1. Control of Packaging Waste
Decko Ltd manages its packaging waste in accordance with the Client project requirements, and where required quantify such waste throughout the project.

8.9. Ecology
Decko Ltd recognises and takes seriously, its legal and moral obligations to nature conservation. The specific areas for consideration on this Project are as follows: Fauna and Flora (no damage of trees, snakes, game) etc