



# BLACK CAT

**COMMUNICATION ON PROGRESS (COP) TO  
UNGC**

**CORPORATE SUSTAINABILITY REPORT  
CORPORATE SOCIAL RESPONSIBILITY  
DEPARTMENT**

**COP TO UNGC- September 11, 2021**

**Period: 2020 - 2021**



## STATEMENT OF CONTINUED SUPPORT

H.E. Antonio Guterres  
Secretary General  
United Nations  
New York, NY 10017  
USA

Dear Secretary General,

“I am pleased to confirm that Black Cat Engineering & Construction W.L.L along its mother company QIPCO Holding, reaffirms its support of the Ten principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption in this our first annual Communication on Progress, we describe our actions to integrate the Global Compact and its principles into our business strategy, culture and daily operations.

We are also committed to share this information with our stakeholders using our primary channels of communication.”

Yours Sincerely,

A handwritten signature in white ink that reads "Paolo Borchetta". The signature is fluid and cursive.



**Paolo Borchetta**

**CHIEF EXECUTIVE OFFICER**





**Paolo Borchetta**  
**CHIEF EXECUTIVE OFFICER**

2021 marks our 40th year of continuous operation in Qatar, and the second year of the COVID-19 pandemic; in the past sixteen months Black Cat has demonstrated a high degree of resiliency as we have adjusted to the new way of doing business dictated by the global health crisis. I am very pleased by the way the whole organization has responded to the crisis and continue to deliver on our mission despite the challenges imposed at local and international level.

Reaching forty years of continuing operation has been no small feat in a market that over the same period, has seen many companies birth and demise; however, this milestone brings along major challenges if we ought to be able to effectively project into the future.

We have achieved projects' gross profitability, our way of doing business has become more agile, and the siloing that plagued our organization is a thing of the past. Due to the contingent situation, we have been forced to puts some of the improvement initiatives on the back burner, however, this is just a temporary set-back, as the COVID-19 crisis slowly will come to an end we will look at bringing some of them out of the drawer.

I am also proud of Black Cat becoming over the past three years a company that is at the forefront of social responsibility practices in the Qatar market; Black Cat walks the talk every day in ensuring that our core stakeholders are engaged and dealt with in a socially responsible manner; our environmental and safety records also bear testimony to our commitment to the best ESG and HS practices.



# ABOUT BLACK CAT

Black Cat (BCEC) is a full-service engineering, procurement, and construction (EPC) company based in Doha since 1981. Black Cat is owned by QIPCO Holding under the patronage of HH Sheikh Abdulla Bin Khalifa Al Thani. We provide a full spectrum of services to our clients, including project development support to engineering, construction management, construction, plant start-up and commissioning, and operations and maintenance.

From modest beginnings in the Oil Fields of Western Qatar (Dukhan), In fact the history of Black Cat goes back to 1937 when CAT Construction was born. In 1951 CAT & Mother well Bridge from Scotland formed “Mother Cat” and in 1981 Mr. George Salman breaks away to form “Black Cat Engineering & Construction” (BCEC) Qatar. This long history and experience enabled Black Cat to develop into one of Qatar’s leading EPC Company.

Black Cat has around 1500 employees currently from almost 32 different countries, BCEC has been delivering top-quality capital projects delivery services to all major clients in Oil & Gas sector since 1981 and has an extensive track record in executing above 500 minor and major projects of the highest quality, to agreed schedules and within budget; we are totally dedicated to innovation and excellence in the provision of all our services.

Our CEO, Mr. Paolo Borchetta has set the Vision to become, over the next decade, a mid-tier transnational, diversified engineering and assets management company serving the Onshore & Offshore Hydrocarbon Processing, Power, Water, and Infrastructure sectors.

<https://youtu.be/OS9pV0QWn7Y>



# OUR VISION

Our Vision is to become, over the next decade, a mid-tier transnational, diversified engineering and assets management company serving the Onshore & Offshore Hydrocarbon Processing, Power, Water and Infrastructures Sectors.

We will achieve our vision through a blend of organic growth and bolt-on acquisitions while maintaining a balanced distribution of our sources of revenues between our domestic and selected export markets.

Throughout our journey we will steadily enhance our capabilities through the development of our human capital, continuous improvement initiatives, strategic partnerships and technologies acquisitions; while leveraging on our company culture, agile operating model and the development and consolidation of long-term key accounts' relationships.

# OUR MISSION

Our Mission is to provide our Clients with Innovative, Safe, Capital Efficient and Environmentally Compatible Design, Engineering, Capital Projects Delivery and Assets Management Services solutions while creating sustainable stakeholders' value and maintaining the highest standards of quality.



# CORE VALUES

## EMPOWERMENT

We promote and support our people active participation in shaping our Company future while valuing their judgement and contribution in executing our strategy and consistently delivering on our Mission.

## ACCOUNTABILITY

We are holding our people accountable while ensuring that accountability is based on a clear identification of their expected contribution in achieving our Vision and delivering on our Mission.

## TRUST

We hold trust in high regard and emphasize it in the relationships with our stakeholders

## INTEGRITY

We deal with our stakeholders on the basis of equal opportunities, transparency and fairness

## LEADERSHIP

We emphasize the development of the highest standards of leadership throughout our organization. Strong leadership creates a committed and cohesive organization which is the basis for excellence and consistency in delivering on our mission's commitments.

## DEPENDABILITY

We strive to achieve the highest level of dependability in delivering on our mission's commitments.



# CORE VALUES

## SAFETY

Adhere to safe working practices and compliance with applicable legislation and regulations that relate to our activities.

## RESPECT FOR THE ENVIRONMENT

No action is too small to deserve our attention when it relates to reducing our environmental footprint. We champion an efficient and environmentally conscious use of the resources at our disposal within our organization and with our supply chain partners.

## VALUE CREATION

We have a clear understanding of the relationships between the operational and financial elements of our operation; we focus on these elements to generate the necessary financial resources to sustainably create value for our stakeholders.

## ENGAGEMENT

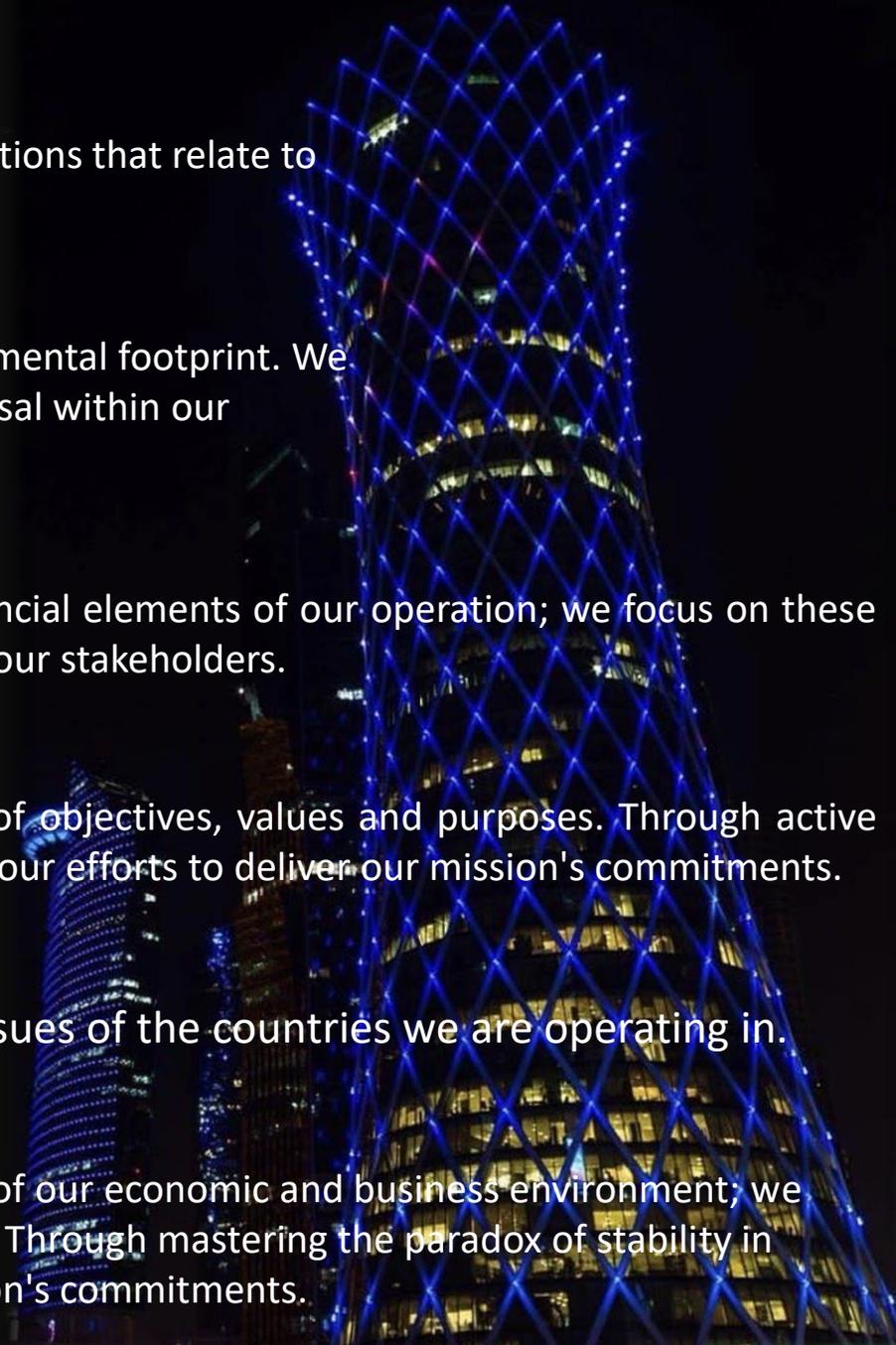
We engage with our stakeholders to achieve clarity of understanding, commonality of objectives, values and purposes. Through active engagement, we aim at establishing a cooperative environment which is supportive of our efforts to deliver our mission's commitments.

## SOCIAL RESPONSIBILITY

We look forward to being an active contributor to the economic and social issues of the countries we are operating in.

## KEEPING AHEAD

We keep abreast, to keep ahead. We keep pace with the evolving and dynamic nature of our economic and business environment; we look at opportunities in change, we focus on self-improvement, innovation and agility. Through mastering the paradox of stability in motion we create sustainable stakeholders value and consistently deliver on our mission's commitments.



# CSR FRAMEWORK

Black Cat has laid the framework and started implementing a robust Corporate Social Responsibility program aiming at adopting socially responsible business practices in dealing with its stakeholders.

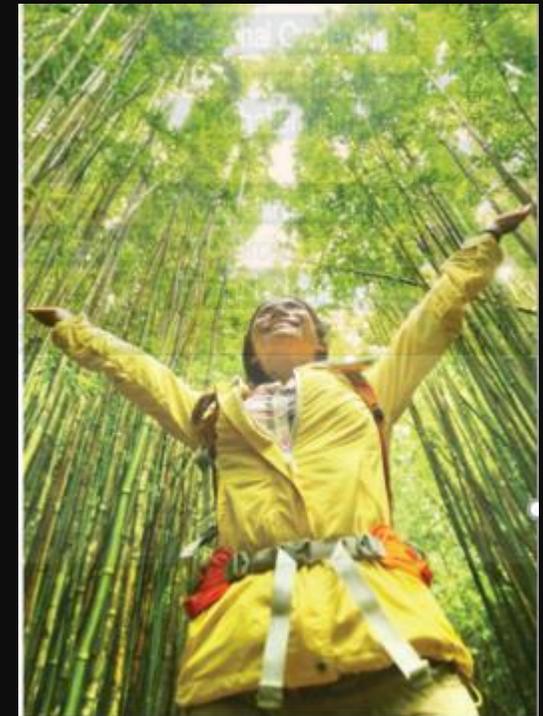
Organizations around the world are becoming increasingly aware of the need for, and benefits of socially responsible behavior, the links between Value generation, preservation, and companies' socially responsible behavior are becoming clearer and clearer to shareholders, investors and financial institutions alike, and socially responsible corporate behavior are increasingly factored into investment and project financing decisions.

An organization's performance in relation to the society in which it operates has become a critical part of measuring its overall performance and its ability to continue operating effectively and sustainably. An organization's performance on the social responsibility front can influence some of the fundamental drivers of Value generation and preservation, among these



- \_ Its competitive advantage.
- \_ Its reputation.
- \_ Its ability to attract and retain talented human resources, customers, or clients.
- \_ The maintenance of employees' morale, commitment, and productivity.
- \_ The view of investors, owners, donors, sponsors, and the broader access to the capital market.

<https://www.blackcatqatar.com/csr/>



# CSR POLICY & GUIDELINES

WWW.BLACKCATQATAR.COM





# POLICY AND GUIDELINES

By

Boussaina Kalo Borchetta

BCEC Sr. Social Responsibility Officer

## CORPORATE SOCIAL RESPONSIBILITY (CSR)





### REVISION HISTORY

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
0	23.07.2013	First Issue and for implementation of Corporate Social Responsibility Policy document	30.07.2013
1	15.07.2020	Revised to reflect new CSR Policy and Guidelines including the 17 SD Goals and to reference with the ISO 26000	15.07.2020
2	15.11.2020	Revised to add Commitment Letter to United Nations Global Compact in Appendix C	15.11.2020

Action	Responsible	Signature	Date
Initiated and Prepared by:	Boussaina Kalo Borchetta		15.11.20
Verified by:	Miejje Villanueva		15.11.20
Checked & Reviewed by:	John Hickey		15.11.20
Approved by:	Paolo Borchetta		15.11.20



**1.0 INTERNAL CONTROLS**

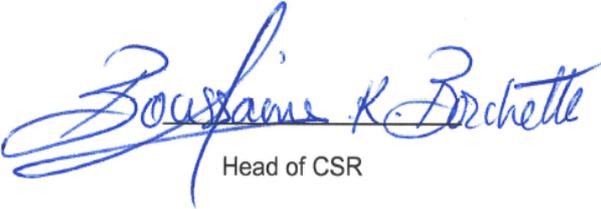
**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this Policy and Guidelines.

The **Corporate Social Responsibility (CSR) Department** shall re-validate this guideline at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

**1.2 APPROVAL**

This guideline and any amendments made thereto; require the following approvals:

Authority	Date
 Head of CSR	<u>15/11/2020</u>
 Chief Executive Officer	<u>15 - 11 - 2020</u>

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed  Date 15-11-2020

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Appendix 1: The 17 SD Goals

Appendix 2: SDGs Booklet

Appendix 3: Commitment Letter to United Nations Global Compact





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## 2.0 INTRODUCTION

CSR expresses a fundamental morality in the way our company behaves towards society, stakeholders, and embraces the spirit of the legal and regulatory environment.

CSR is the way in which our organization creates shared value through economic development, good governance, stakeholder's responsiveness, and environmental attentiveness.

CSR is the blueprint for a concept of values interwoven with the way our business interfaces with our environmental, and societal practices. These concepts of CSR overlap with closely related concepts such as: sustainable development, environmental management, business ethics, and stakeholder management.

CSR, corporate sustainability and responsibility, are in a way intimately linked, the meaning portrays a set of behaviors that reflect the 'triple bottom line' approach principle, our business impacts, and the value proposition stemming from the implementation of the CSR framework; all the while respecting, and taking into account the environmental, economic, and social governance aspects that contribute to our economic growth whilst enhancing our capabilities to achieve:

- A. Sustainable development,
- B. Delivering on the expectation of our stakeholders,
- C. Our compliance with the applicable laws, international norms of behavior, and
- D. CSR integration throughout the organization in the way it develops its business and societal relationships.

To maximize the creation of shared value, BCEC approach to CSR is on a path of adopting a long-term commitment to embracing the UN Sustainable Development Goals (The SDGs 2030 vision) and integrating it into our company's DNA through:

- A. Value creation,
- B. Good Governance,
- C. Societal Contribution,
- D. Environmental attentiveness & integrity.

***Refer to Appendix 3 for BLACKCAT's Commitment Letter to United Nations Global Compact.***

## VALUE CREATION

The value creation from the financial perspective, is influenced by a number of internal and external factors; it balances the economic development of the organization (Value generation) and its shareholders' interests, without adversely impacting the economy,





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the society, and the ecosystem in which our company operates; e.g. ensuring the health of the ecosystems, social equity, and good organizational governance.

## GOOD GOVERNANCE

It is the perception of our company's way of doing business that can influence:

- Our competitive advantage,
- Our reputation,
- Our ability to attract, and retain employees, and clients,
- The maintenance of employee morale, commitment, and productivity,
- The perception of investors, owners, donors, sponsors, and the financial community, and
- Our relationship with companies, governments, NGO's, the media, supply chain partners, peers, and the community in which we operates.

## SOCIETAL CONTRIBUTION

This aspect closely relates to stakeholder's engagement, community involvement, supply chain integrity, and the application of the International Bill of Human Rights' guidelines.

## ENVIRONMENTAL ATTENTIVENESS & INTEGRITY

Aims at improving the ecosystem sustainability as a whole, taking a long term view to environmental issues, rather than simply managing the impacts of individual occurrences.

Sustainability, and Responsibility are two key elements of success in implementing the CSR program. **Sustainability** is an essentially corollary to our company's journey toward realizing our vision, the underlying theme that guide our organization through the challenges we are facing throughout the journey, and an essential component of our strategy's objectives of a positive contribution to the betterment of the communities, and of the society in which we operate. **Responsibility** is the inspiring principle that guide us in developing solutions, responses, and actions.

CSR is considered as the "**Moral Compass**" of our company; in Qatar, and other markets, we aim at earning the "**License to Operate**," a status that implies duties of:





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## Accountability

Black Cat shall accept appropriate scrutiny, and the duty to respond constructively by assuming full responsibility for the effects of its decisions on society, the economy, and the environment.

## Transparency

It is the principle by which our organization accepts being transparent in the way it conducts its activities, and dealings. Transparency implies openness in stating the purposes, and the nature of our activities, identifying the interest of each related parties, including the definition of roles, responsibilities, accountabilities, and authorities across the functions in the organization, while complying with the best industry' practices and standards.

## Ethical Behavior

Our core values emphasize honesty, equity, integrity, concern for people, and the environment. They also emphasize our commitment to assume the consequences of our activities, and decisions when these involve: stakeholders' interests, respect for the rule of law, respect for international norms of behavior, respect for human rights, even when the applicable laws, and regulations do not explicitly require us to do so.

Our organization frames its social responsibility approach within the boundaries set by following Seven Core Subjects:

- Organizational governance,
- Human rights,
- Labor practices,
- The Environment,
- Fair operating practices,
- Clients,
- Community Involvement & Development

Without losing sight of Health & Safety, and the Economics of the operation' value chain, all of which have strong correlation to, and are influenced by the seven core subjects.

## 2.1 AIMS/GOALS AND ASPIRATIONS

Our aims, goals, and aspirations are embedded in our Vision, our Mission, our Policies, and Core Values, which we embrace, and which set the way we govern our organization.





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## OUR VISION

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## OUR CORE VALUES

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### Empowerment

We promote and support our people active participation in shaping our Company future while valuing their judgement and contribution in executing our strategy and consistently delivering on our Mission.





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### Accountability

We are holding our people accountable while ensuring that accountability is based on a clear identification of their expected contribution in achieving our Vision and delivering on our Mission.

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### Trust

We hold trust in high regard and emphasize it in the relationships with our stakeholders.

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### Integrity

We deal with our stakeholders on the basis of equal opportunities, transparency and fairness

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### Leadership

We emphasize the development of the highest standards of leadership throughout our organization. Strong leadership creates a committed and cohesive organization which is the basis for excellence and consistency in delivering on our mission's commitments.





06

### Dependability

We strive to achieve the highest level of dependability in delivering on our mission's commitments.

07

### Safety

Adhere to safe working practices and compliance with applicable legislation and regulations that relate to our activities.

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### Respect for The Environment

No action is too small to deserve our attention when it relates to reducing our environmental footprint. We champion an efficient and environmentally conscious use of the resources at our disposal within our organization and with our supply chain partners.

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### Value Creation

We have a clear understanding of the relationships between the operational and financial elements of our operation; we focus on these elements to generate the necessary financial resources to sustainably create value for our stakeholders.





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### Engagement

We engage with our stakeholders to achieve clarity of understanding, commonality of objectives, values and purposes. Through active engagement, we aim at establishing a cooperative environment which is supportive of our efforts to deliver our mission's commitments.

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### Social Responsibility

We look forward to be an active contributor to the economic and social issues of the countries we are operating in.

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### Keeping Ahead

We keep abreast, to keep ahead. We keep pace with the evolving and dynamic nature of our economic and business environment, we look at opportunities in change, we focus on self-improvement, innovation and agility. Through mastering the paradox of stability in motion we create sustainable stakeholders' value and consistently deliver on our mission's commitments





## 3.0 BLACK CAT CSR OBJECTIVES





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## 3.1 STAKEHOLDER AIMED INITIATIVES

### 1. Employees

#### a) Recruitment

**Objective:** Attracting talented professionals

Reframing-monitoring our recruitment offering to highlight:

- Employment safety in case of illness
- Employment safety in case of death
- Professional development opportunities (identification of aspirations)
- Career Advancement opportunities

#### b) Retainment & Development

**Objective:** Retaining and developing talents

- CSR training
- SDG's training
- Improving labor standards performance  
(Refer to SAI -i.e. Social Accountability International)
- Satisfying employees needs at work
- Black Cat involvement and contribution towards community initiatives
- Death Insurance program
- Enhancement of camp conditions.

This will be achieved through "Pulse Platform."

#### **"The Pulse" Introduction:**

The CSR department is delighted to announce the upcoming launch of Black Cat's exclusive "e-Learning Platform" developed and purpose-built with you in mind. The platform is state-of-the-art with impressive user experience and interface. The launch is planned in phases and will be your go to hub to advance your career, pursue your passion, keep learning and more.

The platform is aimed at giving you a solid up-to-date development, a strong understanding of the CSR principals and commitment that Black Cat is pursuing with a focus on you, bundled with access to a wealth of information links, videos and publications (e-library) related to multiple professional and personal development learnings and trainings - Thus allowing you become the best version of yourself.





The platform will be also used as an interactive tool to conduct the orientation of new employees onboarding, so as to ensure their awareness of Black Cat, the culture and values, the capabilities and services including some of the induction programs relevant to each department and more. To recap, the main intent of the e-Learning platform, is to provide all employees with the opportunity to further their knowledge in all areas of our business and beyond which will be deployed in planned phases.

The e-learning platform is part of CSR action plan, aligned with the vision 2030 of the UN for which Qatar is part of. In order to provide our contribution, Black Cat is linking itself to the SDG's (the Sustainable development Goals, which are part of the UN 2030 AGENDA and of which the ISO 26000 is an advocate); to achieve this alignment will require the collaboration of all our departments to ensure the affiliation and the resulting accreditation of our organization comes to fruition. An "SDG blueprint for a better future" course will be available via the e-Learning platform and is highly recommended that all employees complete the course.

We are finalising the courses in the e-learning platform which will offer a wide range of courses for you to select, complete, and get a Black Cat accredited certificate.

We value your feedback and request every employee, in coordination with their direct supervisors and managers, to provide CSR office with your preferences on the type of course categories or subjects that you feel can enhance your professional knowledge. Only when we receive feedbacks, can we add relevant course categories or subjects into the pipeline for your learning and development.

Point to note, at the end of each course (where applicable), Black cat will issue a certificate of completion that is of a great relevance to your professional advancement, a subject that is very dear to us" With your active participation and completion of courses, we look forward to being motivated and consider further enhancement, development and investment to give you an access to a higher degree of education, in association with renowned entities such as Universities and International Schools for online courses and certifications.

In closure, continuous learning and anticipation are the elements of our culture through which by "keeping abreast, we keep ahead". As the old saying goes, "Luck favour's the prepared". That's why we are actively working to foster your development and well-being in conjunction with CSR initiatives design.





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## 2. Community Initiatives

- Environmental drive: “Encourage the development and diffusion of environmentally friendly technologies.
- Paper minimization initiatives.
- Internships programs with vocational schools & Initiatives.
- Students orientation for an engineering, project management, supply chain careers.
- Cooperation with universities & local societies on development related to our sectors.
- improvement of productivity processes & technology (ERP Implementation).
- Integrate persons with special needs (Part of Qatar “Global declaration”)
- Heritage preservation and to be a sponsor of the art and culture programs.
- Sponsorships for the company CSR Selected Activities.

## 3. NGOs

- Associate with NGOs that promote Social, Environmental & Sustainable Development.
- Black Cat contribution to Q-charity to fight against Covid-19 spread.

## 4. CLIENTS

- Establish -Implement Compliance requirements in line with international standards. (Labor practices – the UN GLOBAL COMPACT and THE SOCIAL ACCOUNTABILITY INTERNATIONAL).

## 5. FINANCIAL INSTITUTIONS AND BANKS

- Compliance framework with equator principle or IFC requirements.

## 6. SUPPLY CHAIN PARTNER

- Monitor the supply sources and the various sub-contractors / suppliers’ compliance with Black Cat CSR Policy.





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## 7. SHAREHOLDERS AND OWNERS

- Sustainable value creation
- Transparency and accountability





# 4.0 CSR PROGRAM IMPLEMENTATION GUIDING PRINCIPLES





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Our sustainability depends on a comprehensive approach to the concept, and includes sustainability of the environment, the way we interact with our stakeholders, including the communities in which we operate and the society at large.

While prioritizing the inner core of our stakeholders, we must maximize alignment and consistency with " Sustainable Development Goals" (SDGs) objectives. There are sets of international benchmarks that promotes and guides CSR initiative to ensure a consistent implementation while emphasizing how the organization can fulfill its needs without jeopardizing the future generations.

The WORLD COMISSION ON ENVIRONMENT & DEVELOPMENT defines sustainable development as follows:

*"Development that meets the needs of the present without compromising the capacity of future generation."*

There are more than 150 world leaders (Qatar included) that adopted the UN 2030 agenda for the sustainable development, to address the current impact of the businesses on the planet, the society, and the repercussions deriving from practices not in accordance with the SDGs guidelines. However, nations are falling far short of their commitments. The major challenge facing the implementation of SDGs consists in urging the plea of their adoption; this plea should not be limited to governments and institutions but should include large and small businesses as well.

Black Cat has a role to play whether there are consequences to its actions or not. We live in one single business community, no business is entirely independent from one another , we all have a stake in pursuing global economic growth even though we often oversight how our everyday business impacts the environment, the community, and the society at large.

While we are looking forward to achieving economic growth, it's important to link our activities to the enhancement of the social progress. Pursuing economic return does not always contribute to social progress; both objectives are not unreconcilable. We are committed to *turning some of the wealth into the wellbeing that contributes to the social progress.*

The 17 SDGs encompass almost 170 targets and hundreds of indicators; meeting goals must be everyone's objective; by incorporating CSR initiatives and policies as a core element of our company's way of approaching what we do, we will enhance our competitive advantage, generate a measurable return, while playing our part in the global effort.





# 5.0 MAPPING OF OUR STAKEHOLDERS





Interested Parties (Stakeholders)	Needs & Expectations
<b>1. Employees</b>	<ul style="list-style-type: none"> <li>• Respectful treatment of all employees, at all levels of the organization</li> <li>• Professional growth through targeted human capital development initiatives.</li> <li>• Reward of performance</li> <li>• Opportunity to use skills and abilities towards the fulfillment of aspirations</li> <li>• Trustworthy and psychological safe working environment</li> </ul>
<b>2. Clients</b>	<ul style="list-style-type: none"> <li>• Reliability</li> <li>• Performance</li> <li>• Efficiency</li> <li>• Openness</li> <li>• Partnership</li> </ul>
<b>3. Shareholders</b>	<ul style="list-style-type: none"> <li>• Sustainable value creation</li> <li>• Transparent relationship</li> <li>• Enhanced risk management</li> </ul>
<b>4. Government &amp; NGOs</b>	<ul style="list-style-type: none"> <li>• Societal contribution</li> <li>• Increase employable skills</li> <li>• Professional development</li> <li>• Better Networking/Affiliation towards the implementation of SDGs / Partnership for the goals (Goal NO 17)</li> </ul>
<b>5. Financial Institutions (Banks)</b>	<ul style="list-style-type: none"> <li>• Fair operating practices</li> <li>• Compliance with responsible financing principles (Equator Principles initiative)</li> </ul>
<b>6. Supply chain partners</b>	<ul style="list-style-type: none"> <li>• Environment, Health &amp; Safety alignment</li> <li>• Quality</li> <li>• Delivery</li> <li>• Innovation</li> <li>• Engagement</li> <li>• Compliance with our policies and procedures</li> <li>• Sustainable relationships</li> </ul>



## 7. Community

- Environmental and active management drive.
- Carbon Footprint reduction
- Internships programs with vocational schools & Initiatives/ Skills development/entrepreneurship training and support through agreements with renowned entities.
- Social investment to foster community development through education, health, activities and sponsorships of heritage preservation and arts.





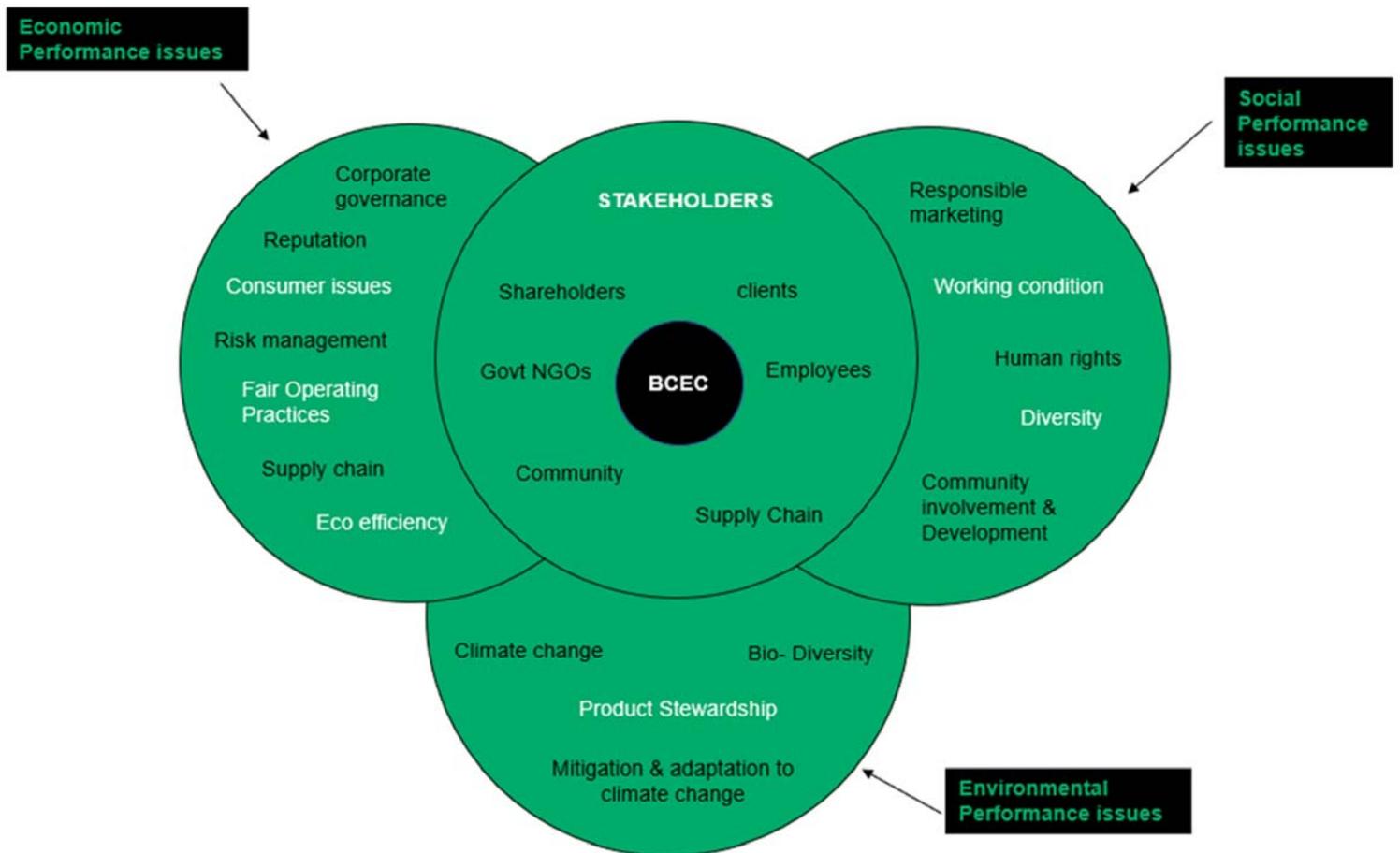
# 6.0 THE TRIPLE BOTTOM LINE

ECONOMIC, ENVIRONMENTAL, SOCIAL GOVERNANCE  
(ESG-THE TRIPLE BOTTOM LINE PRINCIPLE)





## ESG-THE TRIPLE BOTTOM LINE PRINCIPLE





# 7.0 CSR Implementation Strategy

## (THE ALIGNMENT WITH SDG-SUSTAINABLE DEVELOPMENT GOALS)





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Revolving around its stakeholders, the vision of Black Cat is to implement a socially responsible business environment taking the approach of the “**Triple Bottom Line**”; the approach blends the economic, environmental, and social governance, while striving to contribute solutions to the global challenges such as: relieving pressure on environment and resources, reverse climate change trends, tackle the persistent inequalities in access to social progress, work, education, and healthcare.

### REFER TO THE SDGs attached files

#### Appendix 1: The 17 SD Goals

#### Appendix 2: SDG Booklet





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## 7.1 CSR POLICY SUMMARY

Black Cat follows the criteria of ISO 26000, which defines what CSR is:

- “CSR is the responsibility of an organization for the impacts of its decisions and activities on Society and the Environment, through transparent and ethical behavior that;
- Contributes to sustainable Development, including health and the welfare of Society.
- Considers the expectations of stakeholders.
- Is in compliance with applicable law and consistent with international norms of behavior and;
- Is integrated throughout the organization and practiced in its relationships.

### The 7 key principles of ISO 26000

1. Accountability
2. Transparency
3. Ethical behavior
4. Respect for stakeholder interest
5. Respect for rule of law
6. Respect for international norms of behavior
7. Respect for human rights.

### That are broken into 7 core subjects

1. Organizational governance
2. Human rights
3. Labor practices
4. Environment
5. Fair operating practices
6. Consumer issues
7. Community involvement and development





## 1. Organizational Governance with respect to

- Accountability
- Transparency
- Ethical Behavior
- Respect for stakeholder interest
- Respect for the rule of law
- Integrity
- Leadership
- Value creation

## 2. Human rights

Human rights are the basic rights to which all humans are entitled, divided into two categories.

Political and civil rights such as the right to life, freedom, equality, and the second refers to economic, social, and cultural rights such as the right to work, health, education, and social security. Black Cat Commitment is to abide by the following:

### **“INTERNATIONAL BILL OF HUMAN RIGHTS AND THE CORE HUMAN RIGHTS INSTRUMENTS.**

The Universal Declaration of Human Rights (Universal Declaration) [156] was adopted by the UN General Assembly in 1948 and is the most widely recognized human rights instrument. It provides the basis for human rights law, and elements of it represent international customary law binding on all states, individuals, and organizations. The Universal Declaration calls on every individual and every organ of society to contribute to securing human rights. The International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights are treaties adopted by the UN General Assembly in 1966 for ratification by states, and they came into force in 1976. The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, and the optional Protocols to the Covenants, one of which aims to abolish the death penalty.

In addition, seven core international human rights instruments form part of international human rights law, dealing with: the elimination of all forms of racial discrimination , elimination of all forms of discrimination against women , measures to prevent and eliminate torture and other cruel, inhuman or degrading treatment or punishment , rights of the child , involvement of children in armed conflict , sale of children, child prostitution and child pornography, protection of migrant workers and their families , protection of all persons from enforced disappearances and rights of persons with disabilities . Taken together, these instruments form the basis for international standards for universal human rights. The instruments are binding on states that ratify them. Some instruments allow for individual. The instruments are binding on states that ratify them. Some instruments allow for individual complaints to be lodged, subject to procedural rules outlined in optional protocols.





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### 3. Labor Practices

Black cat labor practices must be in accordance with its polices and activities, including Sub-contracted work.

Responsible labor practices should encompass:

- \_ Employment and contractual relationship
- \_ Health and safety at work
- \_ Human development and training in the workplace
- \_ Industrial Hygiene
- \_ Allow grievance mechanism
- \_ Social dialogue and tripartite consultation

Refer to :

#### **The International Labor Organization**

The International Labor Organization (ILO) is a United Nations agency with a tripartite structure (governments, workers, and employers) that was established for the purpose of setting international labor standards. These minimum standards are legal instruments setting out universal basic principles and rights at work. They pertain to workers everywhere, working in any type of organization, and are intended to prevent unfair competition based on exploitation and abuse. ILO standards are developed by tripartite negotiation at the international level among governments, workers, and employers, and are adopted by a vote of the three constituents. ILO instruments are kept up to date through a review process and through the jurisprudence of a formal supervisory mechanism that interprets the meaning and proper application of ILO standards. ILO Conventions and Recommendations, together with the ILO Declaration on Fundamental Principles and Rights at Work 1998 [54] and the ILO's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy 1977 (last revised 2006) [74], constitute the most authoritative guidance regarding labor practices and some other important social issues. The ILO seeks to promote opportunities for women and men to obtain decent and productive work, which it defines as work performed in conditions of freedom, equity, security and human dignity.





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## 4. The Environment

Black Cat will ensure through its decisions and activities to have the proper approach the environment by:

- Using resources in sustainable manner.
- Mitigating and adapting to climate change.
- Contributing to the carbon footprint reduction.
- Preventing pollution.
- Encouraging the development and diffusion of environmentally friendly technologies.

Refer to:

### **UN GLOBAL COMPACT PRINCIPLES**

**Principle 7:** Businesses should support a precautionary approach to environmental challenges.

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

Black cat will contribute to the heritage preservation as a bridge to education, art, and historical culture, since it is a solid foundation that safeguards the inheritance for the next generation.

UNESCO WORLD HERITAGE:

“Distinctive and irreplaceable, cultural heritage is a crucial element in the fabric of the people of our world”





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## 5. Fair Operating Practices

It is the ethical conduct of our organization relationships with government agencies, partners, suppliers, contractors, customers, competitors etc.

Black Cat will adhere:

- To ethical standards
- Accountability
- Transparency
- Fair Competition
- Establishing policies and guidelines in order to counter corruption and fraudulent practices.
- Promoting Social responsibility in the value chain i.e., Integrating ethical, social, environmental, gender equality criteria, and Health & Safety, in its purchasing and contracting practices to improve supply chain alignment with the social responsibility objectives.
- Giving an opportunity of employment to people with special needs.

## 6. Customers

- Reliability
- Performance
- Efficiency
- Openness
- Partnership





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## 7. Community Involvement & Development

Black Cat will share the responsibility to contribute to the community development deriving from its commitment to the SDGs, through:

- Active community involvement
- Education and Culture
- Employment creation and skills development
- Technology development and access
- Wealth and income creation
- Health
- Social Investment



Procedure No.: BCEC/CSR/001  
Effective: 15.11.2020  
Issue Date: 15.11.2020  
Revision No.: 2

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# APPENDICES

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CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY & GUIDELINES  
Prepared by CSR Department  
Approved by Chief Executive Officer

*UNCONTROLLED IF PRINTED. This copy was valid at the time it was printed.*



*Consider the Environment. Please do not print this document unless you really need to, if you need take duplex. At BCEC we support conservation.*



# Appendix 1

## THE 17 SD GOALS





# THE 17 GOALS



# THE 17 GOALS

**960**  
Events

**1205**  
Publications

**5132**  
Partnerships

**174**  
Targets



[See all](#)



**SUSTAINABLE  
DEVELOPMENT  
GOALS**



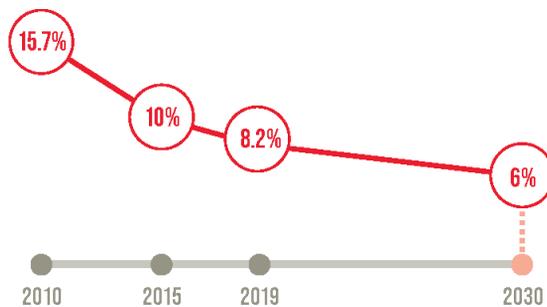
1 NO POVERTY



## END POVERTY IN ALL ITS FORMS EVERYWHERE

### BEFORE COVID-19

THE WORLD WAS **OFF TRACK** TO END POVERTY BY 2030



**YOUNG WORKERS ARE**  
**TWICE AS LIKELY TO BE**  
**LIVING IN EXTREME POVERTY**  
**AS ADULT WORKERS (2019)**

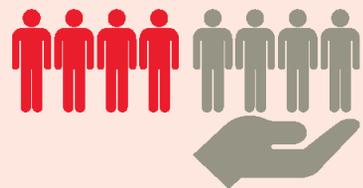
### COVID-19 IMPLICATIONS



**COVID-19 CAUSES**  
**THE FIRST INCREASE**  
**IN GLOBAL POVERTY IN DECADES**



**+71 MILLION PEOPLE ARE PUSHED**  
**INTO EXTREME POVERTY IN 2020**



**4 BILLION PEOPLE**  
**DID NOT BENEFIT**  
**FROM ANY FORM OF**  
**SOCIAL PROTECTION IN 2016**

**NATURAL DISASTERS**  
**EXACERBATE POVERTY**



**\$23.6 BILLION**  
**DIRECT ECONOMIC LOSSES**  
**(FROM 63 COUNTRIES IN 2018)**



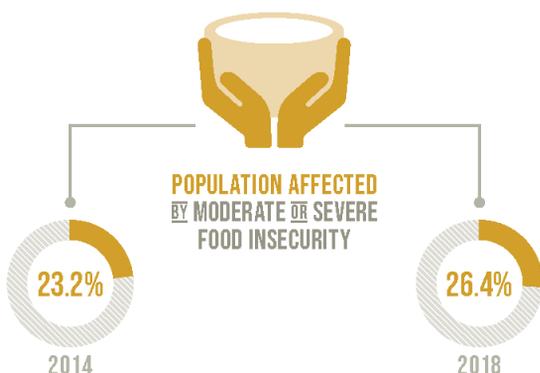
2 ZERO HUNGER



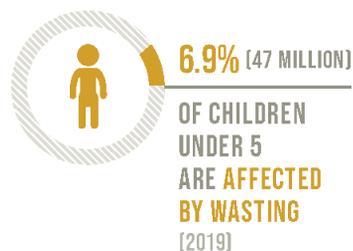
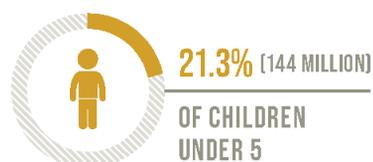
## END HUNGER, ACHIEVE FOOD SECURITY AND IMPROVED NUTRITION AND PROMOTE SUSTAINABLE AGRICULTURE

BEFORE COVID-19

### FOOD INSECURITY WAS ALREADY ON THE RISE

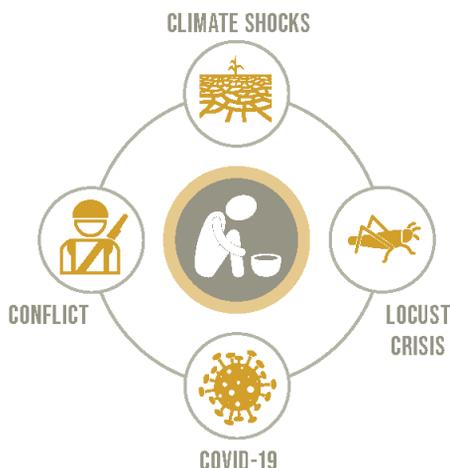


### STUNTING AND WASTING AMONG CHILDREN ARE LIKELY TO WORSEN



COVID-19 IMPLICATIONS

### THE PANDEMIC IS AN ADDITIONAL THREAT TO FOOD SYSTEMS



### SMALL-SCALE FOOD PRODUCERS ARE HIT HARD BY THE CRISIS



COMPRISING 40%-85% OF ALL FOOD PRODUCERS IN DEVELOPING REGIONS



**3** GOOD HEALTH AND WELL-BEING



## ENSURE HEALTHY LIVES AND PROMOTE WELL-BEING FOR ALL AT ALL AGES

### BEFORE COVID-19

PROGRESS IN MANY HEALTH AREAS CONTINUED, BUT NEEDS ACCELERATION



THE PANDEMIC HAS INTERRUPTED CHILDHOOD IMMUNIZATION PROGRAMMES IN AROUND 70 COUNTRIES



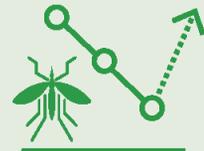
### COVID-19 IMPLICATIONS

HEALTHCARE DISRUPTIONS COULD REVERSE DECADES OF IMPROVEMENTS



HUNDREDS OF THOUSANDS OF ADDITIONAL UNDER-5 DEATHS MAY BE EXPECTED IN 2020

ILLNESS AND DEATHS FROM COMMUNICABLE DISEASES WILL SPIKE



SERVICE CANCELLATIONS WILL LEAD TO 100% INCREASE IN MALARIA DEATHS IN SUB-SAHARAN AFRICA

LESS THAN HALF OF THE GLOBAL POPULATION



IS COVERED BY ESSENTIAL HEALTH SERVICES

[2017]





4 QUALITY EDUCATION



## ENSURE INCLUSIVE AND EQUITABLE QUALITY EDUCATION AND PROMOTE LIFELONG LEARNING OPPORTUNITIES FOR ALL

### BEFORE COVID-19

PROGRESS TOWARDS  
INCLUSIVE AND EQUITABLE QUALITY  
EDUCATION WAS **TOO SLOW**



**OVER 200 MILLION** CHILDREN WILL  
STILL BE **OUT OF SCHOOL** IN 2030

### COVID-19 IMPLICATIONS



SCHOOL CLOSURES KEPT  
**90% OF ALL STUDENTS OUT OF SCHOOL**  
REVERSING YEARS OF PROGRESS ON EDUCATION

### INEQUALITIES IN EDUCATION ARE EXACERBATED BY COVID-19

IN LOW-INCOME COUNTRIES,  
CHILDREN'S SCHOOL COMPLETION RATE IS



**79%** IN RICHEST  
20% OF HOUSEHOLDS



**34%** IN POOREST  
20% OF HOUSEHOLDS

REMOTE LEARNING REMAINS  
**OUT OF REACH FOR**  
AT LEAST  
**500 MILLION STUDENTS**



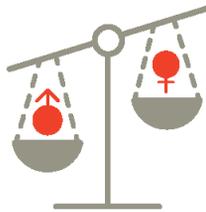
**ONLY 65% OF PRIMARY SCHOOLS**  
HAVE BASIC HANDWASHING FACILITIES  
CRITICAL FOR COVID-19 PREVENTION



# ACHIEVE GENDER EQUALITY AND EMPOWER ALL WOMEN AND GIRLS

## BEFORE COVID-19

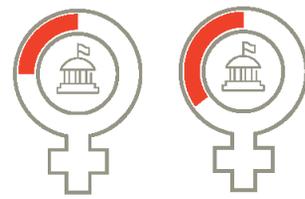
DESPITE IMPROVEMENTS,  
**FULL GENDER EQUALITY**  
REMAINS UNREACHED



FEWER GIRLS ARE FORCED INTO EARLY MARRIAGE  
...  
MORE WOMEN ARE IN LEADERSHIP ROLES

**WOMEN**  
MUST BE REPRESENTED FAIRLY  
IN PANDEMIC-RELATED LEADERSHIP ROLES

### WOMEN REPRESENT



**25%**  
IN NATIONAL  
PARLIAMENTS  
(2020)

**36%**  
IN LOCAL  
GOVERNMENT  
(2020)

## COVID-19 IMPLICATIONS

LOCKDOWNS ARE INCREASING THE RISK OF  
**VIOLENCE AGAINST WOMEN AND GIRLS**



PHYSICAL ——— SEXUAL ——— PSYCHOLOGICAL

CASES OF DOMESTIC VIOLENCE  
**HAVE INCREASED BY 30%**  
IN SOME COUNTRIES

**WOMEN ARE ON THE FRONT LINES**  
OF FIGHTING THE CORONAVIRUS



**WOMEN ACCOUNT FOR 70%**  
OF HEALTH AND SOCIAL WORKERS



**WOMEN BEAR ADDITIONAL HOUSEHOLD BURDENS**  
DURING THE PANDEMIC

↓ ↓ ↓  
WOMEN ALREADY SPEND ABOUT THREE TIMES AS MANY HOURS  
IN UNPAID DOMESTIC AND CARE WORK AS MEN



## ENSURE AVAILABILITY AND SUSTAINABLE MANAGEMENT OF WATER AND SANITATION FOR ALL

### BEFORE COVID-19

DESPITE PROGRESS,  
**BILLIONS STILL LACK**  
WATER AND SANITATION SERVICES



**2.2 BILLION PEOPLE**  
LACK SAFELY MANAGED  
DRINKING WATER  
[2017]



**4.2 BILLION PEOPLE**  
LACK SAFELY MANAGED  
SANITATION  
[2017]



**TWO IN FIVE**  
HEALTH CARE FACILITIES  
WORLDWIDE HAVE  
**NO**  
SOAP AND WATER OR  
ALCOHOL-BASED  
HAND RUB  
[2016]



### COVID-19 IMPLICATIONS



**3 BILLION**  
PEOPLE WORLDWIDE  
LACK BASIC HANDWASHING  
FACILITIES AT HOME  
↓ ↓ ↓  
THE MOST EFFECTIVE METHOD FOR  
COVID-19 PREVENTION



**WATER SCARCITY**  
COULD DISPLACE  
**700 MILLION PEOPLE**  
BY 2030



SOME COUNTRIES EXPERIENCE  
A FUNDING GAP OF **61%** FOR ACHIEVING  
WATER AND SANITATION TARGETS



7 AFFORDABLE AND CLEAN ENERGY



## ENSURE ACCESS TO AFFORDABLE, RELIABLE, SUSTAINABLE AND MODERN ENERGY FOR ALL

BEFORE COVID-19

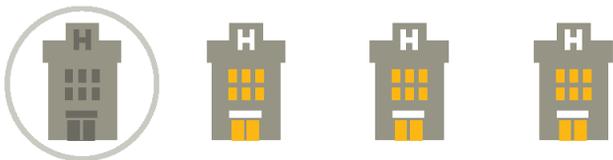
### EFFORTS NEED **SCALING UP** ON SUSTAINABLE ENERGY



**789 MILLION** PEOPLE LACK ELECTRICITY  
(2018)

COVID-19 IMPLICATIONS

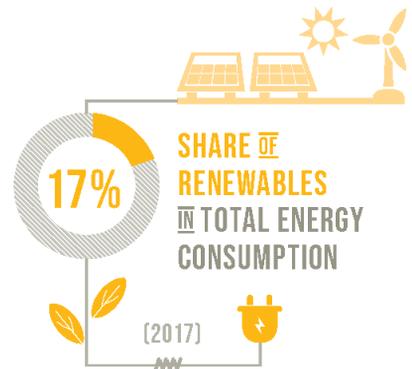
### AFFORDABLE **AND** RELIABLE ENERGY IS CRITICAL FOR HEALTH FACILITIES



**1 IN 4** NOT ELECTRIFIED

IN SOME DEVELOPING COUNTRIES (2018)

### STEPPED-UP EFFORTS IN RENEWABLE ENERGY ARE NEEDED



### ENERGY EFFICIENCY IMPROVEMENT RATE **FALLS SHORT** OF 3% TARGET



FINANCIAL FLOWS TO DEVELOPING COUNTRIES FOR RENEWABLE ENERGY ARE INCREASING

**\$21.4 BILLION**  
(2017)



BUT ONLY **12%** GOES TO LDCs



8 DECENT WORK AND ECONOMIC GROWTH



PROMOTE SUSTAINED, INCLUSIVE AND SUSTAINABLE ECONOMIC GROWTH, FULL AND PRODUCTIVE EMPLOYMENT AND DECENT WORK FOR ALL

### BEFORE COVID-19

GLOBAL ECONOMIC GROWTH WAS SLOWING DOWN



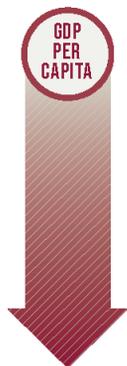
2.0%  
GDP PER CAPITA GROWTH  
(2010-2018)

1.5%  
GDP PER CAPITA GROWTH  
(2019)



DURING THE PANDEMIC  
**1.6 BILLION WORKERS**  
IN THE INFORMAL ECONOMY  
RISK LOSING THEIR LIVELIHOODS

### COVID-19 IMPLICATIONS



THE WORLD FACES THE  
**WORST ECONOMIC RECESSION**  
SINCE THE GREAT DEPRESSION

GDP PER CAPITA  
EXPECTED TO DECLINE  
BY **4.2% IN 2020**

**TOURISM**  
IS FACING  
UNPRECEDENTED  
CHALLENGES



COVID-19 COULD CAUSE THE EQUIVALENT OF  
**400 MILLION JOB LOSSES** IN SECOND QUARTER OF 2020



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



## BUILD RESILIENT INFRASTRUCTURE, PROMOTE INCLUSIVE AND SUSTAINABLE INDUSTRIALIZATION AND FOSTER INNOVATION

BEFORE COVID-19

### MANUFACTURING GROWTH WAS DECLINING



FINANCING FOR

**SMALL-SCALE INDUSTRIES**

IS NEEDED FOR THEIR SURVIVAL THROUGH THE CRISIS



ONLY **35%** HAVE ACCESS TO CREDIT IN DEVELOPING COUNTRIES (2006-2018)

COVID-19 IMPLICATIONS

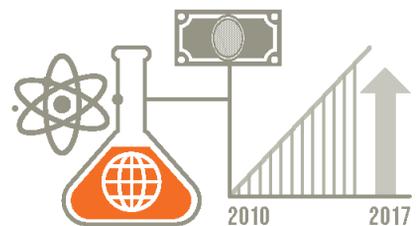
### THE AVIATION INDUSTRY HAS SUFFERED THE STEEPEST DECLINE IN HISTORY



AIR PASSENGER NUMBERS **FELL BY 51%** FROM JANUARY TO MAY 2020 (COMPARED TO THE SAME PERIOD IN 2019)

INVESTMENT IN R&D

IS GROWING BUT NEEDS TO ACCELERATE



**\$1.4 TRILLION** (2010)  
**\$2.2 TRILLION** (2017)

FEWER THAN **1 IN 5** PEOPLE USE THE INTERNET IN LDCs (2019)





10 REDUCED INEQUALITIES



## REDUCE INEQUALITY WITHIN AND AMONG COUNTRIES

BEFORE COVID-19

### INCOME INEQUALITY WAS FALLING IN SOME COUNTRIES



**GINI INDEX FELL**  
IN 38 OUT OF 84 COUNTRIES  
(2010-2017)



THE **GINI INDEX** MEASURES INCOME INEQUALITY AND RANGES FROM 0 TO 100, WHERE 0 INDICATES THAT INCOME IS SHARED EQUALLY AMONG ALL PEOPLE, AND 100 INDICATES THAT ONE PERSON ACCOUNTS FOR ALL INCOME

COVID-19 IMPLICATIONS

### THE MOST VULNERABLE GROUPS ARE BEING HIT HARDEST BY THE PANDEMIC



OLDER PERSONS



PERSONS WITH DISABILITIES



CHILDREN



WOMEN



MIGRANTS AND REFUGEES

### GLOBAL RECESSION COULD SQUEEZE DEVELOPMENT AID TO

DEVELOPING COUNTRIES



RESOURCE FLOWS FOR DEVELOPMENT

\$420  
BILLION  
(2017)



\$271  
BILLION  
(2018)



54% OF COUNTRIES

WITH DATA HAVE A COMPREHENSIVE SET OF MIGRATION POLICIES





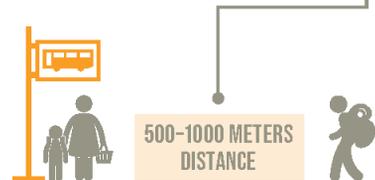
# MAKE CITIES AND HUMAN SETTLEMENTS INCLUSIVE, SAFE, RESILIENT AND SUSTAINABLE

## BEFORE COVID-19

### SHARE OF URBAN POPULATION LIVING IN SLUMS ROSE TO 24% IN 2018



### ONLY HALF THE WORLD'S URBAN POPULATION HAS CONVENIENT ACCESS TO PUBLIC TRANSPORT [2019]



## COVID-19 IMPLICATIONS



### AIR POLLUTION CAUSED 4.2 MILLION PREMATURE DEATHS IN 2016



### 47% OF POPULATION LIVE WITHIN 400 METRES WALKING DISTANCE TO OPEN PUBLIC SPACES



400M

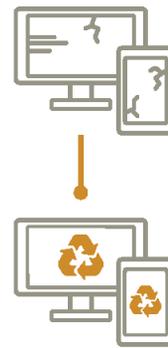




## ENSURE SUSTAINABLE CONSUMPTION AND PRODUCTION PATTERNS

### BEFORE COVID-19

THE WORLD CONTINUES TO USE NATURAL RESOURCES **UNSUSTAINABLY**



**ELECTRONIC WASTE GREW BY 38%**

**BUT LESS THAN 20% IS RECYCLED**  
(2010-2019)

### COVID-19 IMPLICATIONS

THE PANDEMIC OFFERS AN OPPORTUNITY TO **DEVELOP RECOVERY PLANS** THAT BUILD A MORE SUSTAINABLE FUTURE



FROM 2017 TO 2019, 79 COUNTRIES AND THE EUROPEAN UNION REPORTED AT LEAST ONE POLICY TO PROMOTE SUSTAINABLE CONSUMPTION AND PRODUCTION



**RISING FOSSIL FUEL SUBSIDIES ARE CONTRIBUTING TO THE CLIMATE CRISIS**

**\$318 BILLION**  
[2015]

**\$427 BILLION**  
[2018]



HARVESTING



TRANSPORT



STORAGE



PROCESSING

**13.8%**

OF FOOD IS LOST IN SUPPLY CHAINS (2016)



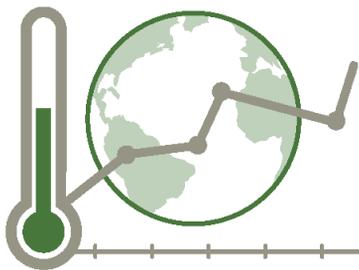
13 CLIMATE ACTION



# TAKE URGENT ACTION TO COMBAT CLIMATE CHANGE AND ITS IMPACTS

## BEFORE COVID-19

GLOBAL COMMUNITY SHIES AWAY FROM COMMITMENTS REQUIRED TO REVERSE **THE CLIMATE CRISIS**



2019 WAS THE SECOND WARMEST YEAR ON RECORD

GLOBAL TEMPERATURES ARE PROJECTED TO RISE BY UP TO 3.2°C BY 2100



**ONLY 85 COUNTRIES HAVE NATIONAL DISASTER RISK REDUCTION STRATEGIES**

ALIGNED TO **THE SENDAI FRAMEWORK**

## COVID-19 IMPLICATIONS

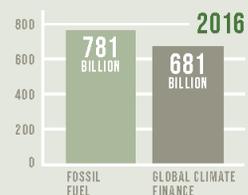


COVID-19 MAY RESULT IN A **6% DROP IN GREENHOUSE GAS EMISSIONS FOR 2020**

STILL SHORT OF **7.6% ANNUAL REDUCTION REQUIRED TO LIMIT GLOBAL WARMING TO 1.5°C**

## CLIMATE FINANCE: INVESTMENT IN FOSSIL FUELS

CONTINUES TO BE HIGHER THAN INVESTMENT IN CLIMATE ACTIVITIES



CLIMATE CHANGE CONTINUES TO EXACERBATE THE FREQUENCY AND SEVERITY OF **NATURAL DISASTERS**



MASSIVE WILDFIRES



DROUGHTS



HURRICANES



FLOODS

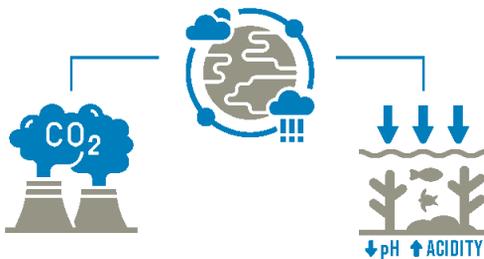
AFFECTING **MORE THAN 39 MILLION PEOPLE** IN 2018



## CONSERVE AND SUSTAINABLY USE THE OCEANS, SEA AND MARINE RESOURCES FOR SUSTAINABLE DEVELOPMENT

### BEFORE COVID-19

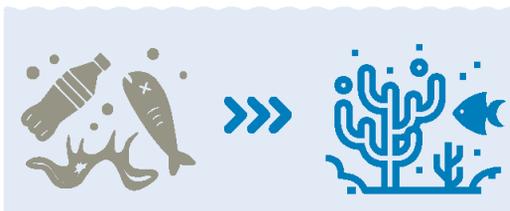
OCEAN ACIDIFICATION CONTINUES TO THREATEN MARINE ENVIRONMENTS AND ECOSYSTEM SERVICES



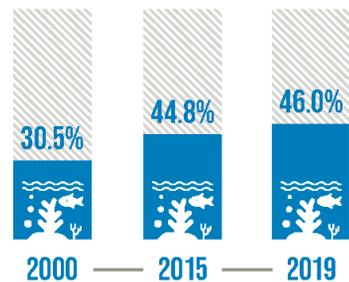
A 100-150% RISE IN OCEAN ACIDITY IS PROJECTED BY 2100, AFFECTING HALF OF ALL MARINE LIFE

### COVID-19 IMPLICATIONS

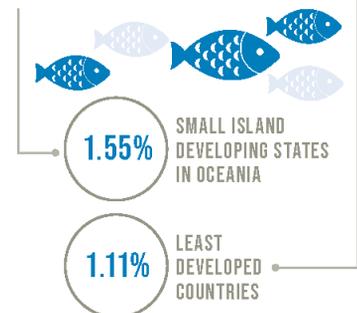
THE DRASTIC REDUCTION IN HUMAN ACTIVITY BROUGHT ABOUT BY COVID-19 MAY BE A CHANCE FOR OCEANS TO RECUPERATE



GLOBAL MARINE KEY BIODIVERSITY AREAS COVERED BY PROTECTED AREAS INCREASED



SUSTAINABLE FISHERIES CONTRIBUTE TO GDP



10x THE GLOBAL AVERAGE

97 COUNTRIES SIGNED THE AGREEMENT ON PORT STATE MEASURES, THE FIRST BINDING INTERNATIONAL AGREEMENT ON ILLEGAL, UNREPORTED AND UNREGULATED FISHING





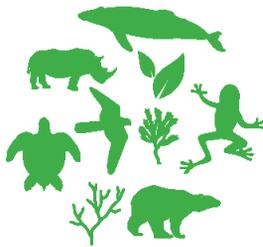
15 LIFE ON LAND



PROTECT, RESTORE AND PROMOTE SUSTAINABLE USE OF TERRESTRIAL ECOSYSTEMS, SUSTAINABLY MANAGE FORESTS, COMBAT DESERTIFICATION, AND HALT AND REVERSE LAND DEGRADATION AND HALT BIODIVERSITY LOSS

BEFORE COVID-19

THE WORLD IS FALLING SHORT ON 2020 TARGETS TO HALT BIODIVERSITY LOSS



OVER 31,000 SPECIES ARE THREATENED WITH EXTINCTION

WHICH IS

27% OF OVER 116,000 ASSESSED SPECIES IN THE IUCN RED LIST

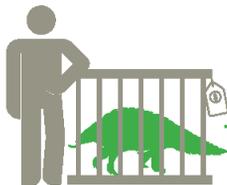


FOREST AREAS CONTINUE TO DECLINE AT AN ALARMING RATE, DRIVEN MAINLY BY AGRICULTURAL EXPANSION

EACH YEAR, 10 MILLION HECTARES OF FOREST ARE DESTROYED (2015-2020)

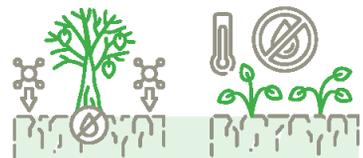
COVID-19 IMPLICATIONS

WILDLIFE TRAFFICKING DISRUPTS ECOSYSTEMS AND CONTRIBUTES TO THE SPREAD OF INFECTIOUS DISEASES



PANGOLINS ARE POSSIBLY THE INTERMEDIARY ANIMAL THAT TRANSFERRED THE CORONAVIRUS

THE EQUIVALENT OF 370,000 PANGOLINS WERE SEIZED GLOBALLY (2014-2018)



TWO BILLION HECTARES OF LAND ON EARTH ARE DEGRADED, AFFECTING SOME 3.2 BILLION PEOPLE, DRIVING SPECIES TO EXTINCTION AND INTENSIFYING CLIMATE CHANGE



ONLY A THIRD OF 113 COUNTRIES WERE ON TRACK TO ACHIEVE THEIR NATIONAL TARGET TO INTEGRATE BIODIVERSITY INTO NATIONAL PLANNING



**PROMOTE PEACEFUL AND INCLUSIVE SOCIETIES FOR SUSTAINABLE DEVELOPMENT, PROVIDE ACCESS TO JUSTICE FOR ALL AND BUILD EFFECTIVE, ACCOUNTABLE AND INCLUSIVE INSTITUTIONS AT ALL LEVELS**

**BEFORE COVID-19**

EVERY DAY,  
**100 CIVILIANS ARE KILLED**  
IN ARMED CONFLICTS



DESPITE PROTECTIONS  
UNDER INTERNATIONAL LAW



THE GLOBAL HOMICIDE RATE  
HAS DECLINED SLOWLY

5.9  
PER 100,000  
POPULATION  
(2015)

5.8  
PER 100,000  
POPULATION  
(2018)

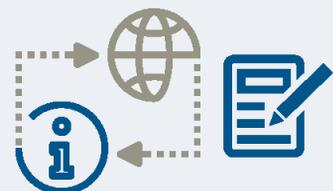
TRANSLATING TO  
440,000 HOMICIDE VICTIMS  
WORLDWIDE

**COVID-19 IMPLICATIONS**

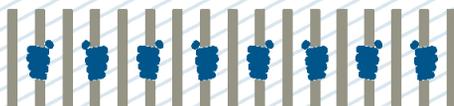
COVID-19 IMPLICATIONS FURTHER THREATEN  
GLOBAL PEACE AND SECURITY



ALREADY IN 2019, THE NUMBER OF PEOPLE FLEEING WAR, PERSECUTION AND CONFLICT EXCEEDED 79.5 MILLION, THE HIGHEST LEVEL EVER RECORDED



**127 COUNTRIES**  
HAVE ADOPTED  
RIGHT-TO-INFORMATION  
OR  
FREEDOM-OF-INFORMATION  
LAWS



**60% OF COUNTRIES HAVE PRISON OVERCROWDING,  
RISKING THE SPREAD OF COVID-19**

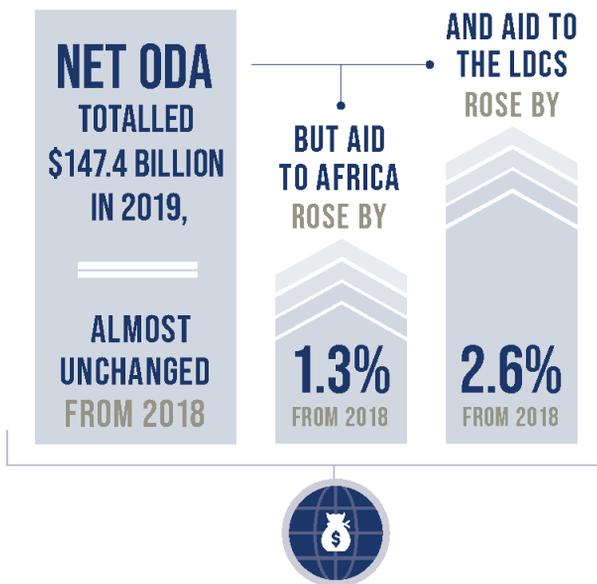


17 PARTNERSHIPS FOR THE GOALS



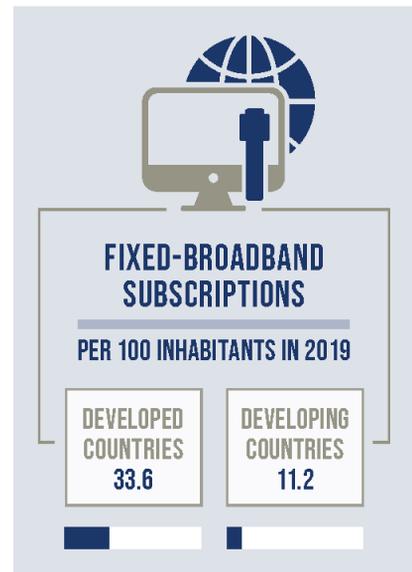
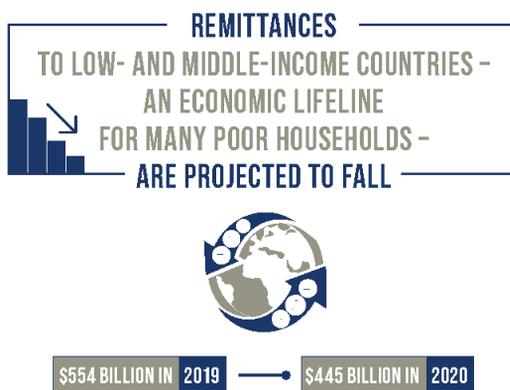
## STRENGTHEN THE MEANS OF IMPLEMENTATION AND REVITALIZE THE GLOBAL PARTNERSHIP FOR SUSTAINABLE DEVELOPMENT

### BEFORE COVID-19

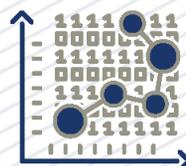


**GLOBAL FOREIGN DIRECT INVESTMENT IS EXPECTED TO DECLINE BY UP TO 40% IN 2020**

### COVID-19 IMPLICATIONS



**INTERNATIONAL FUNDING FOR DATA AND STATISTICS WAS \$690 MILLION IN 2017**



**ONLY HALF THE LEVEL IT NEEDS TO BE**



# SUSTAINABLE DEVELOPMENT GOALS

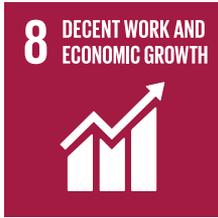




# Appendix 2

## SDGs BOOKLET





## **IN THE YEAR 2015, LEADERS FROM 193 COUNTRIES OF THE WORLD CAME TOGETHER TO FACE THE FUTURE.**

And what they saw was daunting. Famines. Drought. Wars. Plagues. Poverty. Not just in some faraway place, but in their own cities and towns and villages.

They knew things didn't have to be this way. They knew we had enough food to feed the world, but that it wasn't getting shared. They knew there were medicines for HIV and other diseases, but they cost a lot. They knew that earthquakes and floods were inevitable, but that the high death tolls were not.

They also knew that billions of people worldwide shared their hope for a better future.

So leaders from these countries created a plan called the Sustainable Development Goals (SDGs). This set of 17 goals imagines a future just 15 years off that would be rid of poverty and hunger, and safe from the worst effects of climate change. It's an ambitious plan.

But there's ample evidence that we can succeed. In the past 15 years, the international community cut extreme poverty in half.

Now we can finish the job.

The United Nations Development Programme (UNDP) is one of the leading organizations working to fulfil the SDGs by the year 2030. Present in nearly 170 countries and territories, we help nations make the Goals a reality. We also champion the Goals so that people everywhere know how to do their part.

UNDP is proud to continue as a leader in this global movement.

Learn about the Sustainable Development Goals. What's your Goal?

# 1

# NO POVERTY



## **END EXTREME POVERTY IN ALL FORMS BY 2030.**

Yes, it's an ambitious goal—but we believe it can be done. In 2000, the world committed to halving the number of people living in extreme poverty by the year 2015 and we met this goal. However, more than 800 million people around the world still live on less than \$1.25 a day—that's about the equivalent of the entire population of Europe living in extreme poverty. Now it's time to build on what we learned and end poverty altogether.

# 2 ZERO HUNGER



## END HUNGER, ACHIEVE FOOD SECURITY AND IMPROVED NUTRITION AND PROMOTE SUSTAINABLE AGRICULTURE

In the past 20 years, hunger has dropped by almost half. Many countries that used to suffer from famine and hunger can now meet the nutritional needs of their most vulnerable people. It's an incredible accomplishment. Now we can go further and end hunger and malnutrition once and for all. That means doing things such as promoting sustainable agriculture and supporting small farmers. It's a tall order. But for the sake of the nearly 1 out of every 9 people on earth who go to bed hungry every night, we've got to try. Imagine a world where everyone has access to sufficient and nutritious food all year round. Together, we can make that a reality by 2030.

# 3 GOOD HEALTH AND WELL-BEING



## **ENSURE HEALTHY LIVES AND PROMOTE WELL-BEING FOR ALL AT ALL AGES**

We all know how important it is to be in good health. Our health affects everything from how much we enjoy life to what work we can perform. That's why there's a Goal to make sure everyone has health coverage and access to safe and effective medicines and vaccines. In the 25 years before the SDGs, we made big strides—preventable child deaths dropped by more than half, and maternal mortality went down by almost as much. And yet some other numbers remain tragically high, like the fact that 6 million children die every year before their fifth birthday, or that AIDS is the leading cause of death for adolescents in sub-Saharan Africa. We have the means to turn that around and make good health more than just a wish.

# 4 QUALITY EDUCATION



## **ENSURE INCLUSIVE AND EQUITABLE QUALITY EDUCATION AND PROMOTE LIFELONG LEARNING OPPORTUNITIES FOR ALL**

First, the bad news on education. Poverty, armed conflict and other emergencies keep many, many kids around the world out of school. In fact, kids from the poorest households are four times more likely to be out of school than those of the richest households. Now for some good news. Since 2000, there has been enormous progress on the goal to provide primary education to all children worldwide: the total enrolment rate in developing regions has reached 91%. By measures in any school, that's a good grade. Now, let's get an even better grade for all kids, and achieve the goal of universal primary and secondary education, affordable vocational training, access to higher education and more.

# 5 GENDER EQUALITY



## ACHIEVE GENDER EQUALITY AND EMPOWER ALL WOMEN AND GIRLS

We can celebrate the great progress the world has made in becoming more prosperous and fair. But there's a shadow to the celebration. In just about every way, women and girls lag behind. There are still gross inequalities in work and wages, lots of unpaid "women's work" such as child care and domestic work, and discrimination in public decision-making. But there are grounds for hope. More girls are in school now compared to in 2000. Most regions have reached gender parity in primary education. The percentage of women getting paid for their work is on the rise. The Sustainable Development Goals aim to build on these achievements to ensure that there is an end to discrimination against women and girls everywhere.

# 6 CLEAN WATER AND SANITATION



## ENSURE AVAILABILITY AND SUSTAINABLE MANAGEMENT OF WATER AND SANITATION FOR ALL

Everyone on earth should have access to safe and affordable drinking water. That's the goal for 2030. While many people take clean drinking water and sanitation for granted, many others don't. Water scarcity affects more than 40 percent of people around the world, and that number is projected to go even higher as a result of climate change. If we continue the path we're on, by 2050 at least one in four people are likely to be affected by recurring water shortages. But we can take a new path—more international cooperation, protecting wetlands and rivers, sharing water-treatment technologies—that leads to accomplishing this Goal.

# 7 AFFORDABLE AND CLEAN ENERGY



## **ENSURE ACCESS TO AFFORDABLE, RELIABLE, SUSTAINABLE AND MODERN ENERGY FOR ALL**

Between 1990 and 2010, the number of people with access to electricity increased by 1.7 billion. That's progress to be proud of. And yet as the world's population continues to rise, still more people will need cheap energy to light their homes and streets, use phones and computers, and do their everyday business. How we get that energy is at issue; fossil fuels and greenhouse gas emissions are making drastic changes in the climate, leading to big problems on every continent. Instead, we can become more energy-efficient and invest in clean energy sources such as solar and wind. That way we'll meet electricity needs and protect the environment. How's that for a balancing act?

# 8 DECENT WORK AND ECONOMIC GROWTH



## **PROMOTE SUSTAINED, INCLUSIVE AND SUSTAINABLE ECONOMIC GROWTH, FULL AND PRODUCTIVE EMPLOYMENT AND DECENT WORK FOR ALL**

An important part of economic growth is that people have jobs that pay enough to support themselves and their families. The good news is that the middle class is growing worldwide—almost tripling in size in developing countries in the last 25 years, to more than a third of the population. But today, job growth is not keeping pace with the growing labour force. Things don't have to be that way. We can promote policies that encourage entrepreneurship and job creation. We can eradicate forced labour, slavery and human trafficking. And in the end we can achieve the goal of decent work for all women and men by 2030.

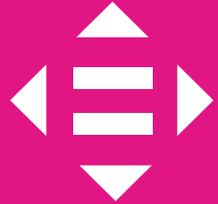
# 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



## **BUILD RESILIENT INFRASTRUCTURE, PROMOTE INCLUSIVE AND SUSTAINABLE INDUSTRIALIZATION AND FOSTER INNOVATION**

Technological progress helps us address big global challenges such as creating jobs and becoming more energy efficient. For example, the world is becoming ever more interconnected and prosperous thanks to the internet. The more connected we are, the more we can all benefit from the wisdom and contributions of people everywhere on earth. And yet four billion people have no way of getting online, the vast majority of them in developing countries. The more we invest in innovation and infrastructure, the better off we'll all be. Bridging the digital divide, promoting sustainable industries, and investing in scientific research and innovation are all important ways to facilitate sustainable development.

# 10 REDUCED INEQUALITIES



## REDUCE INEQUALITY WITHIN AND AMONG COUNTRIES

It's an old story: the rich get richer, and the poor get poorer. The divide has never been starker. We can and must adopt policies that create opportunity for everyone, regardless of who they are or where they come from. Income inequality is a global problem that requires global solutions. That means improving the regulation of financial markets and institutions, sending development aid where it is most needed and helping people migrate safely so they can pursue opportunities. Together, we can now change the direction of the old story of inequality.

# 11 SUSTAINABLE CITIES AND COMMUNITIES



## MAKE CITIES AND HUMAN SETTLEMENTS INCLUSIVE, SAFE, RESILIENT AND SUSTAINABLE

If you're like most people, you live in a city. More than half the world's population now lives in cities, and that figure will go to about two-thirds of humanity by the year 2050. Cities are getting bigger. In 1990 there were ten "mega-cities" with 10 million inhabitants or more. In 2014, there were 28 mega-cities, home to 453 million people. Incredible, huh? A lot of people love cities; they're centers of culture and business and life. The thing is, they're also often centers of extreme poverty. To make cities sustainable for all, we can create good, affordable public housing. We can upgrade slum settlements. We can invest in public transport, create green spaces, and get a broader range of people involved in urban planning decisions. That way, we can keep the things we love about cities, and change the things we don't.

# 12 RESPONSIBLE CONSUMPTION AND PRODUCTION



## ENSURE SUSTAINABLE CONSUMPTION AND PRODUCTION PATTERNS

Some people use a lot of stuff, and some people use very little—in fact, a big share of the world population is consuming too little to meet even their basic needs. Instead, we can have a world where everybody gets what they need to survive and thrive. And we can consume in a way that preserves our natural resources so that our children can enjoy them, and their children and their children after that. The hard part is how to achieve that goal. We can manage our natural resources more efficiently and dispose of toxic waste better. Cut per capita food waste in half globally. Get businesses and consumers to reduce and recycle waste. And help countries that have typically not consumed a lot to move towards more responsible consumption patterns.

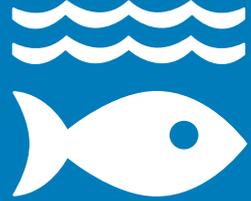
# 13 CLIMATE ACTION



## TAKE URGENT ACTION TO COMBAT CLIMATE CHANGE AND ITS IMPACTS

Every country in the world is seeing the drastic effects of climate change, some more than others. On average, the annual losses just from earthquakes, tsunamis, tropical cyclones and flooding count in the hundreds of billions of dollars. We can reduce the loss of life and property by helping more vulnerable regions—such as land-locked countries and island states—become more resilient. It is still possible, with the political will and technological measures, to limit the increase in global mean temperature to two degrees Celsius above pre-industrial levels—and thus avoid the worst effects of climate change. The Sustainable Development Goals lay out a way for countries to work together to meet this urgent challenge.

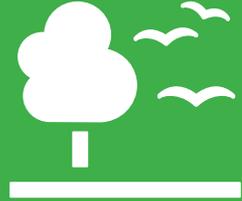
# 14 LIFE BELOW WATER



## CONSERVE AND SUSTAINABLY USE THE OCEANS, SEAS AND MARINE RESOURCES FOR SUSTAINABLE DEVELOPMENT

The oceans make human life possible. Their temperature, their chemistry, their currents, their life forms. For one thing, more than 3 billion people depend on marine and coastal diversity for their livelihoods. But today we are seeing nearly a third of the world's fish stocks overexploited. That's not a sustainable way of life. Even people who live nowhere near the ocean can't live without it. Oceans absorb about 30 percent of the carbon dioxide that humans produce; but we're producing more carbon dioxide than ever before and that makes the oceans more acidic—26% more, since the start of the industrial revolution. Our trash doesn't help either—13,000 pieces of plastic litter on every square kilometer of ocean. Sounds bad, right? Don't despair! The Sustainable Development Goals indicate targets for managing and protecting life below water.

# 15 LIFE ON LAND



## **PROTECT, RESTORE AND PROMOTE SUSTAINABLE USE OF TERRESTRIAL ECOSYSTEMS, SUSTAINABLY MANAGE FORESTS, COMBAT DESERTIFICATION, AND HALT AND REVERSE LAND DEGRADATION AND HALT BIODIVERSITY LOSS**

Humans and other animals rely on other forms of life on land for food, clean air, clean water, and as a means of combatting climate change. Plant life makes up 80% of the human diet. Forests, which cover 30% of the Earth's surface, help keep the air and water clean and the Earth's climate in balance. That's not to mention they're home to millions of animal species. But the land and life on it are in trouble. Arable land is disappearing 30 to 35 times faster than it has historically. Deserts are spreading. Animal breeds are going extinct. We can turn these trends around. Fortunately, the Sustainable Development Goals aim to conserve and restore the use of terrestrial ecosystems such as forests, wetlands, drylands and mountains by 2030.

# 16 PEACE, JUSTICE AND STRONG INSTITUTIONS



## **PROMOTE PEACEFUL AND INCLUSIVE SOCIETIES FOR SUSTAINABLE DEVELOPMENT, PROVIDE ACCESS TO JUSTICE FOR ALL AND BUILD EFFECTIVE, ACCOUNTABLE AND INCLUSIVE INSTITUTIONS AT ALL LEVELS**

How can a country develop—how can people eat and teach and learn and work and raise families—without peace? And how can a country have peace without justice, without human rights, without government based on the rule of law? Some parts of the world enjoy relative peace and justice, and may come to take it for granted. Other parts seem to be plagued by armed conflict, crime, torture and exploitation, all of which hinders their development. The goal of peace and justice is one for all countries to strive towards. The Sustainable Development Goals aim to reduce all forms of violence and propose that governments and communities find lasting solutions to conflict and insecurity. That means strengthening the rule of law, reducing the flow of illicit arms, and bringing developing countries more into the center of institutions of global governance.

# 17 PARTNERSHIPS FOR THE GOALS



## **STRENGTHEN THE MEANS OF IMPLEMENTATION AND REVITALIZE THE GLOBAL PARTNERSHIP FOR SUSTAINABLE DEVELOPMENT**

The Sustainable Development Goals are pretty big to-do list, don't you think? In fact, it's so big, you may just want to throw your hands up in the air. "Forget it! Can't be done! Why even try!" But we've got a lot going for us. The world is more interconnected today than ever before, thanks to the internet, travel and global institutions. There's a growing consensus about the need to work together to stop climate change. And the Sustainable Development Goals are no small matter either. 193 countries agreed on these goals. Pretty incredible, isn't it? 193 countries agreeing on anything? The final goal lays out a way for nations to work together to achieve all the other Goals.





## Appendix 3

# COMMITMENT LETTER TO UNITED NATIONS GLOBAL COMPACT



Ref: 01520/GEN/27

Dated : 10/09/2020

H.E. António Guterres  
Secretary-General  
United Nations  
New York, NY 10017  
USA

Dear Secretary-General,

**Black Cat Engineering & Construction W.L.L.** hereby confirms its support and expresses our intent to implement each of the four issue areas of the Ten Principles of the United Nations Global Compact, namely

- Human Rights,
- Labour,
- The Environment and
- Anti-Corruption

Moreover, **Black Cat Engineering & Construction W.L.L.** is committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engage in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. [

Furthermore, **Black Cat Engineering & Construction W.L.L.** will commit to demonstrating ethical leadership and good governance through values-based strategies, policies, operations and relationships when engaging with all stakeholders and the general public.

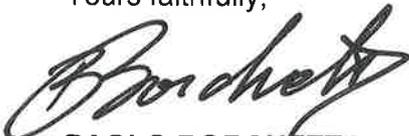
**Black Cat Engineering & Construction W.L.L.** recognizes that a key requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to successfully implement the Ten Principles.

To ensure public accountability and transparency, **Black Cat Engineering & Construction W.L.L.** is hereby committing to report on progress within one year of joining the UN Global Compact, and annually thereafter according to the UN Global Compact COP Policy.

**Black Cat Engineering & Construction W.L.L.** will therefore formally submit:

- A statement signed by the Chief Executive Officer expressing continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles which will be in addition to our initial letter of commitment to join the UN Global Compact.
- A description of practical actions, relevant policies, procedures and activities that **Black Cat Engineering & Construction W.L.L.** has taken or plans to undertake to implement the UN Global Compact principles in each of the four issue areas listed above.
- A measurement of the success in achieving these outcomes

Yours faithfully,



PAOLO BORCHETTA  
Chief Executive Officer



**10,000 companies  
+ 4,000 non-businesses**

IN THIS SECTION ▼

## Company Information

Company

# Black Cat Engineering & Construction WLL

[www.blackcatqatar.com](http://www.blackcatqatar.com)

**Type:**  
Company

**Country:**  
Qatar

**Sector:**  
Construction &  
Materials

**Ownership:**  
Privately Held

**Engagement Tier:**  
Participant

**Global Compact Status:**  
Active

**Participant Since**  
11 September 2020

[Letter of Commitment](#)

# CSR

Corporate Social Responsibility



CSR is considered as our “Moral Compass”, in Qatar and other market... we aim to earn a “License to operate”.



“CSR is the responsibility of an organization for the impacts of its decisions and activities on Society and the Environment, through transparent and ethical behaviour that:

- Contributes to sustainable Development, including health and the welfare of Society.
- Considers the expectations of stakeholders.
- Is in compliance with applicable law & consistent with international norms of behaviour and:
- Is integrated throughout the organization and practiced in its relationships.
- CSR is the way in which BCEC creates shared value through
  - economic development,
  - good governance,
  - stakeholders responsiveness and;
  - environmental attentiveness.

**Black Cat CSR Video**

[https://youtu.be/sJL\\_WbjWWho8](https://youtu.be/sJL_WbjWWho8)

# ESG

Economic, Environmental, Social  
Governance

## TRIPLE BOTTOM LINE APPROACH

Revolving around its stakeholders, the vision of BCEC is to implement a socially responsible business environment taking the approach of the “**Triple Bottom Line**”; the approach blends the economic, environmental, and social governance, while striving to contribute solutions to the global challenges such as: relieving pressure on environment and resources, reverse climate change trends, tackle the persistent inequalities in access to social progress, work, education, and healthcare.



# ESG – THE TRIPLE BOTTOM LINE PRINCIPLE

ECONOMIC  
PERFORMANCE ISSUES

SOCIAL  
PERFORMANCE ISSUES



ENVIRONMENTAL  
PERFORMANCE ISSUES



# SDG

Sustainability Development Goals

## THE 17 UN GLOBAL GOALS ARE IN BUSINESS

To maximize the creation of shared value, BCEC approach to CSR is on a path of adopting a long-term commitment to embracing the UN Sustainable Development Goals (The SDGs 2030 vision) and integrating it into our company's DNA through

- Value creation
- Good Governance
- Societal Contribution
- Environmental
- Attentiveness & integrity

Every company and every employee has a role to play in creating a more peaceful and prosperous future for people and for planet.

THAT FUTURE IS EVERYBODY'S BUSINESS.



# INTRODUCTION

The world is facing global challenges.

Demographic changes, urbanization, economic growth...

Generating higher demand for mobility

Pressure on environment resource, scarcity,

Climate change, persistence in equalities in access to social progress.....

Work, Education, Health, Culture.

Collectively we must find a way to develop, that meets the need of the present without compromising the future. This is sustainable development.

Black Cat contributes to Sustainable development by providing solutions which enable the transition to sustainable business operating systems and by integrating Sustainability in its business model.

For Black Cat, sustainability or corporate social responsibility will mean Integrating Environmental, Ethical and Social aspects in its strategy, processes and activities.

This approach is essential because our customers have specific environmental and social expectations from our projects because our employees consider it important to work for a company that takes **CSR** seriously. Because good sustainability performance supports Operational excellence and because long term vision contributes to good risk management of the company to address these risks and opportunities, we progressively develop our sustainability and **CSR** strategy.

**Black Cat** integrates environmental and social aspects in design of its solutions and the way it conducts operations, manages people and supply chain and interacts with its local communities.

# VARIOUS CSR ACTIVITIES

CORPORATE SOCIAL  
RESPONSIBILITY



Boussaina Kalo Borchetta  
Sr. Social Responsibility Officer

“

Black Cat has laid the framework and started implementing a robust Corporate Social Responsibility program aiming at adopting socially responsible business practices with its stakeholders.



## THE GLOBAL GOALS ARE IN BUSINESS

In the face of multiple systemic, interconnected crises, the solutions require ALL OF US to play our part. The Global Goals simply cannot be achieved without businesses.

Through their core operations, financial commitments, employee networks, consumer-facing platforms and high-level influence, companies have a crucial role to play in accelerating progress towards the Goals.

Every business and every employee can make a vital contribution to creating a more peaceful, equitable and prosperous future.

UN SDG + BCEC



# Manifesto

Imagine a world where there is **NO POVERTY** and **ZERO HUNGER**.

We have **GOOD HEALTH AND WELL BEING**, **QUALITY EDUCATION**, and full **GENDER EQUALITY** everywhere. There is **CLEAN WATER AND SANITATION** for everyone.

**AFFORDABLE AND CLEAN ENERGY** has helped to create **DECENT WORK AND ECONOMIC GROWTH**.

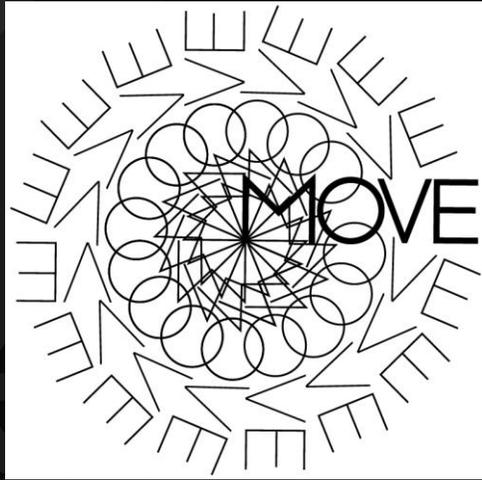
Our prosperity is fueled by investments in **INDUSTRY, INNOVATION AND INFRASTRUCTURE** and that has helped us to **REDUCE INEQUALITIES**.

We live in **SUSTAINABLE CITIES AND COMMUNITIES** and **RESPONSIBLE CONSUMPTION AND PRODUCTION** is healing our planet. **CLIMATE ACTION** has capped the warming of the planet and we have flourishing **LIFE BELOW WATER** and abundant, diverse **LIFE ON LAND**.

We enjoy **PEACE AND JUSTICE** through **STRONG INSTITUTIONS** and have built long term **PARTNERSHIPS FOR THE GOALS**.

<https://youtu.be/ph21-m6mOU4>  
<https://youtu.be/ra7Y6pnsOWs>  
[https://youtu.be/c\\_4NxCs-2ws](https://youtu.be/c_4NxCs-2ws)  
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<https://youtu.be/JhGbjtQpkUk>  
<https://youtu.be/F5SIQvs4n9c>  
<https://youtu.be/as0W1XVMft0>





Meet **MOVE**, our  
CSR department  
icon.

Name inspired from  
Dove.

We have to **MOVE** forwards  
to becoming a leading social  
responsible player by  
achieving our objectives

## FIVE OBJECTIVES

Our CSR priorities at Black Cat closely align with the company's business objectives. In Black Cat the CSR department has laid the framework and started implementing a robust Corporate Social Responsibility program aiming at adopting socially responsible business practices targeted to the entire spectrum of its stakeholders. The CSR department are committed to ensure the following objectives.

#1

Conduct business responsibly by contributing to the economic health and sustainable development of the communities in which we operate.

#2

Provide a fair return to our shareholders while fulfilling the above principles

#3

Be accountable to our stakeholders through dialogue and transparency regarding the economic, social, and environmental impacts of our business activities.

#4

Minimize the negative impacts our activities can have on the environment and its resources, while striving to provide our customers with products and services that take sustainable consumption into account.

#5

Provide to our employees a healthy and safe working conditions, ensure fair compensation, good communication, as well as equal opportunity for employment and development.





**United Nations  
Global Compact**

**Black Cat's  
commitment to  
UNGC**

We signed the letter of commitment for the SDG 2030 VISION, and we are the official participant of the United Nations Global Compact.

#1

Support and intent to implement each of the four issue areas of the Ten Principles of the United Nations Global Compact (UNGC), namely: Human Rights, Labour, The Environment, and Anti-Corruption.

#2

Making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engage in collaborative projects which advance the border development of the United Nations, particularly in Sustainable Development Goals.

#3

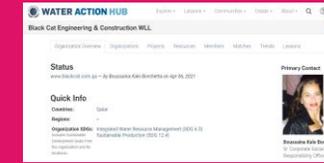
Demonstrate ethical leadership and good governance through value-based strategies, policies, operations and relationships when engaging with stakeholders and the general public.

#4

Submit Communication of Progress (COP) that describes our company's efforts to successfully implement the Ten Principles.



# HIGHLIGHTS



Black Cat recently registered its Dukhan Production Facilities Upgrade Project via United Nations Water Hub contributing to the SDG “Sub- goal 6.5 INTEGRATED WATER RESSOURCES MANAGEMENT” & Sub-goal 12.4 “Sustainable production”.

<https://wateractionhub.org/organizations/1234/d/black-cat-engineering-construction-wll/>

Attending various conferences to create and increase the level of awareness of these issues at all levels within the company.

Launched the Pulse E-learning Platform which is the first step toward applying the SDGs to our most important stakeholders, our employees; The PULSE platform allows all of us to expand our professional knowledge horizons, at our own pace, without limitations, by having access to a structured source of knowledge and the possibility of engaging fellow employees, management included, in the sharing of our learning experience or if needed, for some mentoring.

Started an internship program for engineering, and other business-related disciplines' students for both Qatari and non-Qatari students with a focused and challenging 8 weeks work placement where they will be able to utilize the skills and knowledge developed at university in an actual workplace environment. Interns are going through different departments in order to provide them with a wide-angle view of how their specific discipline, interrelate with other company's domains.

CSR Department conducts regular site visits along with HSE & QC departments to ensure the workers wellbeing, health, and safe working conditions.



## HEALTH SAFETY & ENVIRONMENT

“

We have witnessed many significant achievements and positive HSE performances in last one year.

One of the successes is that we were able to achieve our 2020 HSE objectives and it was only possible with an active participation and commitment from each one of you. Attaining ISO 45001:2018 certification is another remarkable achievement for us, where we successfully completed 3rd party audit without any NCR's.

I would also like to highlight senior management and CSR participation during site HSE walkthrough's and HSE committee meetings which shows their commitment towards HSE. Also, we have implemented several initiatives for waste management and energy conservation focusing to achieve the principles of UNGC.



**HSE RESULTS**  
Staff Survey

**95%**

I have the knowledge and skills to do my job safely.

**94%**

I am encouraged to speak up if I feel something is unsafe.

**88%**

This organization is making effective improvements to its systems while keeping staff safe.

**GOOD HSE PERFORMANCE**

Compared to last 5 years, we have good HSE performance in 2020 and 2021. As of May 2021, we completed 7.8-million-man hours without a Lost Time Injury and more than 200 days without a recordable injury.

As we all know that COVID-19 pandemic has given a serious threat to people, business and economies all over the world since 2020 which is challenging for everyone. Black Cat Engineering has also been through some hard time due to the adverse effects of COVID-19 pandemic. At the end, we overcome the challenges, survived, and now moving forward towards our Goal “Zero Harm”. Let us move forward, giving more focus on identifying and managing risk at workplace ensuring no one is injured, no environmental impact and at the end of the day, we all go home safely.

Please ensure that you take responsibility for your part in the big picture enabling continued growth and continued positive performance where “Zero Harm” is a reality.

# HIGHLIGHTS

- Obtained ISO 45001:2018 certification
- BCEC has completed 8.5 million manhours without LTI
- BCEC has completed 300 plus days without any recordable injuries
- Health Check-up campaign conducted at head office
- Celebrated 2 million manhours without LTI @ QSGTL QPH projects
- Received appreciation certificate from QP for completing 3 million man-hours without LTI for CNG project.
- Celebrated 500 injury free days @ RLIC workshop on 5th March 2021.
- Successfully completed BV surveillance audit 2
- Celebrated 4 million manhours without LTI @ QSGTL EPCM Portfolio Project.



## QA/QC

“

We go beyond the basics and are not content with simply meeting minimum project's quality requirements.



# ISO 9001:2015

Black Cat uses its quality management system across all of its sites to ISO 9001:2015 standards. This certifies that we have an independently-verified quality system in place across all our projects, from execution till handover.

Black Cat is certified to ISO 9001:2015 – the highest internationally recognized standard in quality management. We don't only satisfy quality system requirements to deliver the best possible service to our clients - we continually strive to exceed them.



**To meet the requirements of ISO 9001:2015, all our people understand that we expect them to:**

**#1**

Maintain a quality management system to international standards.

**#2**

Ensure that our clients receive the highest quality services on time and at a competitive price.

**#3**

Integrate our suppliers and sub-contractors into our business processes.

**#4**

Maintain continuous quality improvement culture.

# HIGHLIGHTS

ZERO Internal /External NCR's

ZERO RFI Rejection

ZERO RFI Cancellation

ZERO RFI With Comments

ZERO Weld repair rate

100% target on achieving Quality Culture

Timely execution of QA audits with ensuring in time closure of quality issues

Implementation of Quality Poster on-site and discussed in Tool Box

Quality Initiative to conduct Quality Site Visit by Lead QAQC at least 2 times a week for all Projects

Weekly Quality Walkthrough

Weekly Quality Tool Box Talk

Mandatory Quality Awareness training implemented for all new joins

# HUMAN RIGHTS

Human rights are the basic rights to which all humans are entitled, divided into two categories. Political and civil rights such as the right to life, freedom, equality, and the second refers to economic, social, and cultural rights such as the right to work, health, education, and social security. Black Cat Commitment is to abide by “INTERNATIONAL BILL OF HUMAN RIGHTS AND THE CORE HUMAN RIGHTS INSTRUMENTS”



# Black Cat human rights initiatives includes, but not limited to:

- HR and OHS policy and Procedures have been established to protect workers from physical, verbal, sexual or psychological harassment at workplace.
- Dedicated HSE Team to each Black Cat's Project has been assigned to deal with hazardous situations or activities which could harm human life
- Freedom to express or share opinion of all Black Cat employees regardless of the position in the company.
- Suggestion box has been installed at head office and site offices although Black Cat is also following open door policy.
- Organized awareness training of employees on Human Rights
- All employees including workers are provided safe working condition with adequate sanitation facilities.



## Black Cat human rights initiatives includes, but not limited to:

- Dedicated responsibilities assigned to ensure respect and support of human rights within the organization.
- Records of employees complains, grievances and any other pending issues related to Human Rights are maintained and discussed during Management Review.
- Black Cat monitor and evaluate performance through Internal Audits and Management review meetings.
- CSR Department in coordination started an Internship program for engineering students for both Qatari and Non-Qatari students, Achieving inclusive and quality education for all reaffirms the belief that education is one of the most powerful and proven vehicles for sustainable development. It also aims to provide equal access to affordable vocational training and to eliminate gender and wealth disparities with the aim of achieving universal access to a quality higher education.



# PROCEDURE

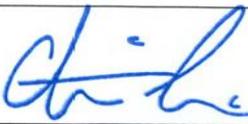
## HEALTH SAFETY & ENVIRONMENT (HSE)

## JOB HAZARD ANALYSIS (JHA)



### REVISION HISTORY

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
0	13.06.2011	First Issue and for implementation of procedure on Job Safety Analysis (JSA) to comply with OHSAS 18001:2007 standard requirements.	20.06.2011
1	18.08.2019	Reviewed and revalidated; Re-named procedure title from Job Safety Analysis (JSA) to Job Hazard Analysis; Revised/updated contents of the procedure to reflect changes and current process within the Company; Clarified some previous sections and added several new sections to better address the requirements of Company's HSE management systems.	25.08.2019

Action	Responsible	Signature	Date
Initiated by:	J. Francis		22/08/2019
Prepared by:	D. Guinto		22/08/2019
Checked & Reviewed by:	C.P. Gibson		22/08/2019
Approved by:	P. Borchetta		22/08/2019



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### APPENDICES

**Appendix 1 – BCEC RISK ASSESSMENT MATRIX (RAM)**

### ATTACHMENTS

**Attachment No. 1 – JOB HAZARD ANALYSIS (JHA) FORM**

**Attachment No. 2 – JHA EXTENDED FORM**

**Attachment No. 3 – WORKPLACE INSPECTION (Example)**



**1.0 INTERNAL CONTROLS**

**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this Procedure.

The **Health, Safety & Environment and Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

**1.2 APPROVAL**

This procedure and any amendments made thereto; require the following approvals:

**Authority**

**Date**



HSEQ Manager

22/08/2019



Chief Executive Officer

22/08/2019

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed .....  .....

Date ..... 22/08/2019 .....



## 2.0 PURPOSE

The purpose of this procedure is to ensure that safe execution of work is planned into the daily work activities and forms a significant part of the overall safe work strategy and aspiration of Zero Harm. The Job Hazard Analysis (JHA) process is intended to involve employees and sub-contractors in the hazard identification process to ensure that hazards are identified, reviewed and either eliminated or controlled prior work commencing.

## 3.0 SCOPE

This procedure has been developed in compliance to ISO 45001:2018/OHSAS 18001:2007 Standard and intended for all Black Cat Engineering & Construction, W.L.L. (BCEC) employees. The Job Hazard Analysis (JHA) process shall be used to avoid any potential harm or loss during routine and non-routine activities. By utilizing this hazard management process Black Cat aspiration of Zero Harm to people, the environment and Zero damage or loss can be realized.

## 4.0 RESPONSIBILITIES

The following section outlines the core functional roles and responsibilities for those project/BCEC personnel associated with the BCEC JHA process.

### 4.1 **SITE PROJECT MANAGER (APPROVAL AUTHORITY)**

The Site Project Manager is responsible for ensuring that all BCEC, Construction, Commissioning, and Third-party personnel are aware of the requirement when assessing the risks and controlling the hazards that are associated with their work scopes

### 4.2 **PROJECT WORKS SUPERVISOR (WS)**

The Works Supervisor always ensures that personnel under his/her supervision comply with this procedure. In addition, the Supervisor reviews the completed Job Hazard Analysis to ensure all hazards are captured and either eliminated or controlled and are appropriate for the intended work.

The Works Supervisor or their representative shall:

- Ensure prior to starting the work that all safety precautions are in place including JHA, marked up drawings, relevant certificates etc.
- Ensure that the Work Team Members - have reviewed emergency procedures, assembly points, and emergency evacuation routes; including communicating the information to the crewmembers.
- Stop the execution of the work in case of deviation from the requirements of the Work Permit and inform his direct line Manager and or the area owner.
- Participating/Lead the Pre-Job Meeting "Tool-Box Talks"

### 4.3 **HSE LEAD/OFFICER**

The HSE Lead/Officer will ensure there is an adequate risk assessment/hazard identification process in place that meets all the regulatory requirements.

Specific Responsibilities include:

- Periodic reviews of the JHA process at work in the field. Complete work place inspection
- Where applicable sign and verify the quality of the completed process for high risk activities.



- Ensure all BCEC and contractor personnel are aware of the risk assessment process.

#### 4.4 **PERMIT TO WORK COORDINATOR/ISSUER (PTWC)**

The BCEC Permit to Work Coordinator (PTWC) is responsible for ensuring that all preparations are complete, and all Permit Holder/Requestor preparations are understood to allow issuing of the permit for endorsement by the Approval Authority and Area Owner. This includes a verification check that all required accompanying documentation, including JHA are attached, are of a high quality and relevant to the task.

#### 4.5 **PERMIT HOLDER REQUESTOR (PHR)**

The Permit Holder - Requester (PHR) is a project representative in charge of the work to be executed under the Work Permit. The permit holder cannot be a non BCEC 3rd party, (IE a Vendor).

Specific Responsibilities Include:

- Ensuring the Identification all job-related hazards, the risks associated with the use of any contractor equipment and the nature of the works to be performed.
- Having a good understanding of all interfaces with surrounding activities.
- Participating in the Job Hazard Analysis process and/or completing the JHA form
- Having knowledge of all procedures for the execution of the works
- Understanding all instructions concerning the work, the rules, and procedures with respect to safety and the discipline, and enforcing them within the working team.
- Participating in the Pre-Job Meeting "Tool-Box Talks"

#### 4.6 **WORK TEAM MEMBERS (WTM)**

The work team are the BCEC representatives who perform the job and includes the individuals who supervise the work team during the job on site.

The work team is technically responsible for the job execution. The Work Team shall:

- Have a good understanding of the job-related hazards and of all possible interfaces with surrounding activities.
- Participate in Hazard identification and compensatory measures discussion with the Area Owner and the Permit Holder - Requester.
- Participates and signs onto JHA/toolbox talk in acceptance of PTW conditions (Where applicable)
- Ensure understanding the nature of the work and the associated risks.
- Participate in Tool Box Talk prior to starting job.
- Ensure that precautions laid down can be implemented at the execution stage
- Stop the execution of the work in case of any deviation from the requirements of the Work Permit and immediately inform the Works Supervisor

#### 4.7 **AREA OWNER (OR CLIENT/COMPANY REPRESENTATIVE) (AO)**

The Area Owner is responsible for the work activities in their area of responsibility, and for compliance with all Client/BCEC Procedures. They are responsible to ensure all precautions are defined on the preparations section for all work permits executed in their area of responsibility.

The Area Owner interacts with the Works Supervisor and Team members performing the work, within their area of responsibility, to assist in prioritizing the work activity. It is essential that the AO is familiar with all the work in the area and notes where other SIMOPS may affect a specific work permit.



Specific Responsibilities Include:

- Identify the hazards inherent to the work environment and are identified and controlled within the JHA
- Initiate and organize kick-off meetings for specific works (TBT)
- Ensure the correct issue of Complementary Documents/Certificates.
- Undertake spot field inspections of ongoing work within their area of responsibility to ensure all hazards associated with the task are identified and risk mitigation strategies are implemented prior to the PTW permit pack being developed.
- Visiting the worksite at a frequency relative to the work activity being performed
- Participating in the Pre-Job Meeting “Tool-Box Talks”

## 5.0 PROCEDURE

### 5.1 JOB HAZARD ANALYSIS (JHA)

The Job Hazard Analysis (JHA) in most cases supports the permit to work system (PTW) by identifying actual - potential hazards and control measures to be implemented. The JHA process is to be implemented for all tasks that have the potential to cause harm or loss to people, plant, equipment and the environment, including those covered by PTW Authorizations, standard work instructions, and or procedures. There will be occasions where the JHA will be produced without the process support of a permit to work. This instance will be where the task is deemed to be low risk and or classified as routine low risk. Examples of low risk routine tasks are:

- Minor housekeeping cleanup activities
- Mobilizing minor equipment to site
- Wash down activities
- Activities within site offices – Cleaning etc.

The JHA form shall be completed prior to the site permit being issued or prior to the commencement of any work task. The JHA should be developed in detail by the workgroup who are to undertake the task. Throughout the duration of the work task, the Tool Box Talk will serve as a JHA review process by the involved workgroup at regular intervals and whenever change occurs such as:

- Variations to a Permit
- A change of personnel undertaking the work;
- A change of tools, plant or equipment required to complete the work; and
- A change to the working environment, i.e. in a confined space or working at height.

**See Attachment No. 1 – Job Hazard Analysis (JHA) Form** and Attachment No. 2 – JHA Extended Form

### 5.2 HOW IS A JHA CONDUCTED

#### 5.2.1 CRITICAL FACTORS

The two most critical aspects of a JHA are:

- Team participation to maximize the input of experience.
- Agreement and ownership of specific barriers/controls by individuals involved in the job.



### 5.2.2 SELECTION OF METHOD

The JHA team leader shall select a method most appropriate for the job. The three alternative methods of performing a JHA are:

#### **By Direct Observation**

In this method the persons doing the analysis observe the job being done. They may observe the process several times before they identify all the separate steps and the potential accidents and develop final solutions. In addition, they may observe different employees doing the same job to establish variations in doing the job.

#### **By Group Discussion**

Here the JHA is accomplished by a group of people familiar with the job. Under the guidance of the leader the group members use their collective experience to identify the job steps and the potential accidents in each, and develop good solutions. This method would be used for a desktop JHA.

#### **By Recall and Check**

The recall and check method are so-called because the leader prepares a preliminary version of the JHA based on recall rather than of direct observation of the job. The team then checks this preliminary version by discussion or by directly observing the steps of the job about which there may be doubts.

### 5.2.3 CONDUCTING A JHA

As stated, the key to a good JHA is the participation of those doing the job.

The HSE representative/Works Supervisor will establish a team to carry out the Job Safety Analysis. The team should include the following people –

- Those who perform the work
- Those who supervise the work
- Those who prepared the method statement
- Health and Safety Representative

A leader for the JHA shall be nominated. This person should be competent at team leadership and completed the JHA Training.

For operational input (Process Safety) an operations or Client representative should be present.

This ensures that those doing the work are involved in the JHA development and the allocation of appropriate barriers.

### 5.3 PROCESS

Once the work scope is identified, those doing the work are led through the procedures of following the prompts on the JHA Worksheet.

- Break the job into steps that represent specific parts of the job – not too complicated or too simple.
- For each step apply the questions of what can go wrong and what barrier(s)/controls will be put into place to eliminate or control the hazard.
- Agree with the team who will take ownership of each barrier. After the initial identification of the hazards this is the most important part of the entire process. Allocating a barrier to 'All' or 'The crew' is not effective as it has no ownership, and everyone may well assume another is maintaining the barrier.



- Initial and final risk ranking must be agreed using the Risk Ranking Matrix once a reasonable control has been agreed/identified (RAM)
- The works supervisor/team leader shall review and approve all completed JHA's prior to the job starting.
- Each team member shall sign on and date their acknowledgement that they have read and understood the JHA. This is recorded on the JHA/TBT
- Support the plan as outlined in the JHA whilst doing the job
- At the completion of the work, a quick review of what was planned versus what happened is undertaken by those on the job and recorded as necessary.
- Once the JHA has been reviewed by the work group it shall be sent to the discipline supervisor or delegate for final review, then passed on to Administration for recording into the JHA Project folder.

#### 5.4 **POTENTIAL HAZARD ANALYSIS**

After hazards and consequences are identified, the team will evaluate risk associated with each set of activities by applying the "Likelihood Descriptions" and "Consequence Descriptions" from the Risk Assessment Matrix to evaluate the hazards and the potential undesired events that could result from the hazards. Results will be recorded in the initial and final "Risk Ranking column on the JHA form.

*See Appendix 1 – RAM*

#### 5.5 **GENERIC JHA'S**

Work scope that is repeated on a regular basis such as erecting and dismantling scaffold or insulation work may have generic JHA's. These JHA's must go through a review process prior to commencing the job, due to the fact that each job environment will most likely be different each time. The review process must incorporate at least the following,

- Review all steps, hazards and controls and add or delete as appropriate.
- Identify person/s for "Who owns the barriers" column.

#### 5.6 **IMPLEMENTATION**

The JHA Team Leader shall ensure that the completed and reviewed Job Hazard Analysis is passed onto the Work Supervisor. For desktop JHA the results shall form part of the project work pack.

The outputs (Hazard Control Measures) from the Job Hazard Analysis shall be incorporated in the appropriate Technical Procedure/Work Instruction/Work Permit Procedures.

Personnel shall be appropriately trained and informed of the Hazard Control Measures before commencement of the work task.

The JHA worksheet/form shall be included as an attachment to the permit to work relating to that task.

### 6.0 **MEASUREMENT AND VERIFICATION**

#### 6.1 **QUALITY ASSURANCE**

HSEQ will be involved in regular safety inspections and planned HSE audits. BCEC shall implement a QHSE audit and inspection schedule. This will include audits conducted internally and those done by Third Party.



## 6.2 WORKPLACE INSPECTIONS

BCEC are committed to establishing a regular consistent approach to work place inspections to ensure that our operations are maintaining a high standard of compliance. The inspections are to be completed daily during high activity periods to provide HSE assurance. The BCEC management team will also be involved in monthly Safety walkthrough to ensure the senior management leadership is actively involved with the engagement process. The walkthrough process will be coordinated by the Corporate HSE Coordinator with a set schedule agreed by senior management.

*See Attachment No. 3 – Work Place Inspection example*

## 6.3 KEY PERFORMANCE INDICATORS

BCEC shall implement both “Lead and Lag” indicators to monitor the effectiveness of and compliance with the HSE management program.

HSE performance against these set KPI's will be reported each week. In addition to weekly reporting of the above KPI's a monthly report detailing and consolidating the HSE performance for the month is also submitted to Corporate HSE.

### 6.3.1 KPI PROCESS

Zero Harm Hazard Observations & Interventions (ZHO) – This is the Hazard Report Card process expected of all personnel. This includes hazard observations, positive observations, improvement suggestions and stop work authority.

Zero Harm Work Place Engagement (Task Specific, TBT – Take 5) This process is essentially the pre-start engagement where project management team up with supervision and HSE officers to attend and get involved in the task TBT and Take 5 prior to the commencement of the work

Zero Harm Work Place Inspections (WPI) – The Work Place Inspections have been developed around the key BCEC and Client procedures. They are to be completed by the discipline leads, engineers and the HSE advisors with the task supervisors.

Risk Assessment (JHA/Take 5) – The risk analysis process is complete for all permit tasks and some routine tasks. This is a fluid total with the daily totals changing with the number of permits raised for the day.

Weekly Scheduled HSE Walkthrough – These projects organized HSE engagement and assurance sessions are held on each project weekly. They are specifically for senior company management to get involved with site safety interaction with the work force + allow for a high-level assurance check.



## 7.0 REFERENCES

INTERNAL-Procedure/Document Title	Document No.
BCEC Permit to Work	BCEC/HSE/CP/018
HSE Risk and Hazard Management	BCEC/HSE/CP/029
BCEC Safe Isolation-Lock out Tag Out (LOTO)	BCEC/HSE/CP/028
Zero Harm Hazard Observations (ZHO)	BCEC/HSE/CP/003
<b>EXTERNAL</b>	
OSHA Regulation 1910.119	Process Safety Management of Highly Hazardous Chemicals
OSHA Regulation 1910.132	Personal Protection Equipment
OSHA Regulations 1910.146	Confined Space Entry
OSHA Regulations 1910.147	Lock Out Tag Out
OHSAS 18001:2007 / ISO 45001:2018	Occupational health and safety management systems — International Standard Requirements



## APPENDICES



## Appendix 1 – BCEC RISK ASSESSMENT MATRIX (RAM)

BCEC RISK ASSESSMENT MATRIX (RAM)						
CONSEQUENCES						
PROBABILITY	Descriptor	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
	Almost Certain	9	16	18	23	25
	Likely	4	11	17	20	24
	Possible	3	10	13	19	22
	Unlikely	2	6	12	14	21
	Rare	1	5	7	8	15
RISK LEVELS		HSE RISK RESPONSE GUIDE				
Very High	23	25	This is an unacceptable level of risk. Immediate action is required to identify control measures to reduce risk to ALARP.			
High	16	22	Immediate action is required to identify control measures to reduce the risk to ALARP. Work can only progress at this residual risk level with the approval of the BCEC CEO			
Moderate	9	15	Further action is required to identify control measures to reduce the risk to ALARP. Work can only progress at this residual risk level with the approval of the senior site representative			
Low	2	8	Ensure no further control measures are required to demonstrate that the risk is ALARP. Responsible senior BCEC site representative to ensure all identified control measures are in place prior to the work progressing			
Very Low	0	1				
HSE CONSEQUENCE / SEVERITY TABLE						
Consequence	Health & Safety	Environmental Impact	Asset Loss or Damage	Business Risk	Fanatical Impact	
Catastrophic	Multiple fatalities. Multiple serious disabling injuries	Release of pollutants capable of causing irreversible environmental harm requiring national/international resources for remediation	Massive Damage	Company prosecuted. Loss of future work. Project shutdown. Violation of company policy. Widespread dissatisfaction resulting in legal action	>\$30 Million	
Major	Single fatalities, serious injury resulting in permanent disability. Multiple injured parties	Release of pollutants to sensitive areas. Immediate off-site contamination requiring state or regional external resources for remediation Long term impact (1-6 months)	Major Damage	Adverse national media coverage. Significant reduction in customer satisfaction. Threat to project success with potential for legal action	\$10M - \$30M	
Moderate	Lost time injury Restricted Work Day Injury reportable to regulatory body	Environmental harm reportable to government authority. Breach of license conditions/lease. Onsite contamination with the potential to cause offsite contamination. Medium to long term (1-6 months)	Moderate Damage	Local media coverage. Failure causing customer dissatisfaction with moderate delay. Rework or extra work requiring additional resources. Client forced to impose penalties	\$2M - \$10M	
Minor	Medical Treatment First Aid treatment	Minor on site pollution not within the confines of the protected areas. No long term impacts. Clean up within 1 month	Minor Damage	Telephone or written complaints. Failure causing slight customer concern and inconvenience. Resolved with current levels of resources	\$50K - \$2M	
Insignificant	No treatment required	Localized contained impact immediate completed fix. Clean up	Slight Damage	Minimal or no impact to project delivery	Less than \$50K	
PROBABILITY						
Probability	Descriptions					
Almost Certain	This event is expected to occur is known to have occurred frequently at BCEC in similar situations					
Likely	This event may occur or is known to have occurred at BCEC in similar circumstances					
Possible	This event might occur or is known to have occurred at BCEC in additional circumstances					
Unlikely	This event could occur or is known to have occurred in the industry but not at BCEC					
Rare	This event may only occur in exceptional circumstances or is not known to have occurred in the industry					

BCEC/HSE/QS-066/REV.1/03.06.2019



## ATTACHMENTS



**Attachment No. 1 – JOB HAZARD ANALYSIS (JHA) FORM (3 pages)**

<b>Initial Risk Rating</b>	<b>Job Hazard Analysis</b>	<b>Final Risk Rating</b>																
<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td style="background-color: #f08080;">VERY HIGH</td><td><input type="checkbox"/></td></tr> <tr><td style="background-color: #ffcc00;">HIGH</td><td><input type="checkbox"/></td></tr> <tr><td style="background-color: #ffff00;">MODERATE</td><td><input type="checkbox"/></td></tr> <tr><td style="background-color: #90ee90;">LOW</td><td><input type="checkbox"/></td></tr> </table>	VERY HIGH	<input type="checkbox"/>	HIGH	<input type="checkbox"/>	MODERATE	<input type="checkbox"/>	LOW	<input type="checkbox"/>	<p>المكتب الأسود للهندسة والإنشاءات ذ.م.ك. ENGINEERING &amp; CONSTRUCTION W.L.L. Member of QIPCO HOLDING</p>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr><td style="background-color: #f08080;">VERY HIGH</td><td><input type="checkbox"/></td></tr> <tr><td style="background-color: #ffcc00;">HIGH</td><td><input type="checkbox"/></td></tr> <tr><td style="background-color: #ffff00;">MODERATE</td><td><input type="checkbox"/></td></tr> <tr><td style="background-color: #90ee90;">LOW</td><td><input type="checkbox"/></td></tr> </table>	VERY HIGH	<input type="checkbox"/>	HIGH	<input type="checkbox"/>	MODERATE	<input type="checkbox"/>	LOW	<input type="checkbox"/>
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<b>SECTION 1: To be completed by Work Supervisor</b>																		
<b>1a</b>	Applicant: _____ Date: _____ Time: _____	Expiry: _____																
<b>1b</b>	WORK LIMITED to the following (Job Scope/Description):  _____	WP No: _____ PTW No: _____ IC No: _____ SWMS No: _____																
<b>1c</b>	Equipment Tag No.: _____	<p>The five steps of Take 5 are:</p> <ul style="list-style-type: none"> <li>1 Stop, step back, observe</li> <li>2 Walk - through task</li> <li>3 Identify hazards</li> <li>4 Control and communicate hazards</li> <li>5 Safely complete task</li> </ul> <p><b>BLACK CAT</b>   المكتب الأسود للهندسة والإنشاءات ذ.م.ك. ENGINEERING &amp; CONSTRUCTION W.L.L. Member of QIPCO HOLDING</p>																
<b>1d</b>	Job Site Location: _____ Division: _____																	
<b>1e</b>	JHA Observation Team: _____ _____ _____																	
<b>1f</b>	<b>Personal Protective Equipment, Precautions and Safeguards (Mark (✓) those that apply to job)</b>																	
	<p><b>Clothing</b></p> <p><input type="checkbox"/> Long Sleeves <input type="checkbox"/> Disposable <input type="checkbox"/> Flame Retardant <input type="checkbox"/> Cooling Vest</p> <p><b>Suit Type:</b> <input type="checkbox"/> Coveralls <input type="checkbox"/> Rain <input type="checkbox"/> Chemical <input type="checkbox"/> Welding <input type="checkbox"/> _____</p> <p><b>Apron Type:</b> <input type="checkbox"/> Leather <input type="checkbox"/> Chemical <input type="checkbox"/> Work Vest <input type="checkbox"/> _____ <input type="checkbox"/> Life Jacket <input type="checkbox"/> Life Ring Buoy</p> <p><b>Others:</b> _____</p>	<p><b>Foot/Leg Protection</b></p> <p><input type="checkbox"/> Steel Toed Footwear <input type="checkbox"/> Dielectric Boots <input type="checkbox"/> Metatarsal Protection <input type="checkbox"/> Rubber Boots</p> <p><b>Hearing Protection</b></p> <p><input type="checkbox"/> Ear plugs <input type="checkbox"/> Ear Muff <input type="checkbox"/> Single <input type="checkbox"/> Double Limit time exposure: _____</p> <p><b>Hand Protection</b></p> <p><b>Gloves Type:</b> <input type="checkbox"/> Chemical <input type="checkbox"/> Leather <input type="checkbox"/> Cotton <input type="checkbox"/> Welding <input type="checkbox"/> Insulated gloves</p>	<p><b>Eye Protection</b></p> <p><input type="checkbox"/> Safety glasses <input type="checkbox"/> Chemical Goggles <input type="checkbox"/> Cutting/Grinding Goggles</p> <p><b>Face/Head Protection</b></p> <p><input type="checkbox"/> Hard Hat <input type="checkbox"/> Face Shield</p> <p><b>Hood Type:</b> <input type="checkbox"/> Painting <input type="checkbox"/> Welding <input type="checkbox"/> _____ <input type="checkbox"/> Other: _____</p> <p><b>Barricading</b></p> <p><input type="checkbox"/> Caution <input type="checkbox"/> Danger <input type="checkbox"/> Other: _____</p>	<p><b>Respiratory</b></p> <p><input type="checkbox"/> Dust mask <input type="checkbox"/> Supplied Air <input type="checkbox"/> Air Pack (SCBA) Respirator Type: _____</p> <p><b>Warning Signs</b></p> <p><input type="checkbox"/> Hearing <input type="checkbox"/> X-ray <input type="checkbox"/> N<sub>2</sub> purge <input type="checkbox"/> Other: _____</p> <p><b>Additional Requirements</b></p> <p><input type="checkbox"/> Personal Gas Monitor Type: _____ <input type="checkbox"/> Residual Current Device (RCD) <input type="checkbox"/> Written Work Instruction <input type="checkbox"/> Communication Equip: _____ Channel: _____</p>														
<b>1g</b>	Tools and Equipment to be used: _____																	
<b>SECTION 2: To be completed by Crew Leader and Verified by Approval Authority and Permit to Work Coordinator</b>																		
<b>2a</b>	<b>Hazards and Control Measures</b>																	
	<b>Step</b>	<b>Task Description</b>	<b>Hazards(s) Identified</b>	<b>Control(s)</b>	<b>Initial Risk Rating</b>	<b>Final Risk Rating</b>												

Initial Risk Rating		Final Risk Rating	
	VERY HIGH		VERY HIGH
	HIGH		HIGH
JHA #:	MODERATE		MODERATE
PTW #:	LOW		LOW



**Job Hazard Analysis**  
 المكتب الأسود للهندسة والإنشاءات ذ.م.م  
 ENGINEERING & CONSTRUCTION W.L.L.  
 Member of QIPCO

Step	Task Description	Hazards(s) Identified	Control(s)	Initial Risk Rating	Final Risk Rating

**SECTION 3: By relevant parties**

**3 a Review and Approval**

**Approver:** (Control measures are adequate for all identified hazards)  
 Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

**Work Supervisor:** (The risk assessment with this job/task has been evaluated and reduced to an acceptable level and adequate control measures have been confirmed and approved)  
 Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

**Permit to Work Coordinator:** (I have reviewed any area hazards and confirmed adequate control measures)  
 Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

**3 b Work/Job Closure**

**Comments/lessons learned:** \_\_\_\_\_

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BCEC/HSE/QS-110/REV.0/18.08.2019

<b>Initial Risk Rating</b>	<b>Job Hazard Analysis</b>	<b>Final Risk Rating</b>																
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JHA #:																		
PTW #:																		

BCEC RISK ASSESSMENT MATRIX (RAM)						
CONSEQUENCES						
PROBABILITY	Descriptor	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
	Almost Certain	9	16	18	23	25
	Likely	4	11	17	20	24
	Possible	3	10	13	19	22
	Unlikely	2	6	12	14	21
	Rare	1	5	7	8	15
RISK LEVELS		HSE RISK RESPONSE GUIDE				
Very High	23 25	This is an unacceptable level of risk. Immediate action is required to identify control measures to reduce risk to ALARP.				
High	16 22	Immediate action is required to identify control measures to reduce the risk to ALARP. Work can only progress at this residual risk level with the approval of the BCEC CEO				
Moderate	9 15	Further action is required to identify control measures to reduce the risk to ALARP. Work can only progress at this residual risk level with the approval of the senior site representative				
Low	2 8	Ensure no further control measures are required to demonstrate that the risk is ALARP. Responsible senior BCEC site representative to ensure all identified control measures are in place prior to the work progressing				
Very Low	0 1					
HSE CONSEQUENCE / SEVERITY TABLE						
Consequence	Health & Safety	Environmental Impact	Asset Loss or Damage	Business Risk	Fanatical Impact	
Catastrophic	Multiple fatalities. Multiple serious disabling injuries	Release of pollutants capable of causing irreversible environmental harm requiring national/international resources for remediation	Massive Damage	Company prosecuted. Loss of future work. Project shutdown. Violation of company policy. Widespread dissatisfaction resulting in legal action	>\$30 Million	
Major	Single fatalities, serious injury resulting in permanent disability. Multiple injured parties	Release of pollutants to sensitive areas. Immediate off-site contamination requiring state or regional external resources for remediation. Long term impact (1-6 months)	Major Damage	Adverse national media coverage. Significant reduction in customer satisfaction. Threat to project success with potential for legal action	\$10M - \$30M	
Moderate	Lost time injury. Restricted Work Day. Injury reportable to regulatory body	Environmental harm reportable to government authority. Breach of license conditions/lease. Onsite contamination with the potential to cause offsite contamination. Medium to long term (1-6 months)	Moderate Damage	Local media coverage. Failure causing customer dissatisfaction with moderate delay. Rework or extra work requiring additional resources. Client forced to impose penalties	\$2M - \$10M	
Minor	Medical Treatment. First Aid treatment	Minor on site pollution not within the confines of the protected areas. No long term impacts. Clean up within 1 month	Minor Damage	Telephone or written complaints. Failure causing slight customer concern and inconvenience. Resolved with current levels of resources	\$50K - \$2M	
Insignificant	No treatment required	Localized contained impact immediate completed fix. Clean up	Slight Damage	Minimal or no impact to project delivery	Less than \$50K	
PROBABILITY						
Probability	Descriptions					
Almost Certain	This event is expected to occur or is known to have occurred frequently at BCEC in similar situations					
Likely	This event may occur or is known to have occurred at BCEC in similar circumstances					
Possible	This event might occur or is known to have occurred at BCEC in additional circumstances					
Unlikely	This event could occur or is known to have occurred in the industry but not at BCEC					
Rare	This event may only occur in exceptional circumstances or is not known to have occurred in the industry					

BCEC/HSE/QS-066/REV.1/03.06.2019



Procedure No.: BCEC/HSE/CP/017  
 Effective: 22.08.2019  
 Issue Date: 18.08.2019  
 Revision No.: 1

**Attachment No. 3 – WORK PLACE INSPECTION (EXAMPLE: Safe Isolation-LOTO)**

BLACK CAT		ENGINEERING & CONSTRUCTION W.L.L.				LOCATION:	
Member of QIPCO						DATE: / / Time:	
WORKPLACE INSPECTION ENGAGEMENT			ELEMENT NO. 5 SAFE ISOLATION - LOTO				
A = Acceptable			NI = Needs Improvements		UA = Unacceptable		N/A = Not Assessed
No.	ITEM	COMPLIANCE ACHIEVED				COMMENTS	
	PTW Number:	A	NI	UA	N/A		
1	Is all required documentation attached to the permit and being complied to? i.e. MS, P&ID's and other drawings						
2	Are workers aware of potential issues that would require the task to be stopped? i.e. isolation failing, tags missing, stored pressure						
3	Has an isolation certificate and/or plan been established which identifies each point where locks and tags are to be applied?						
4	Have locks and tags have been applied in accordance with the isolation certificate and/or plan?						
5	Has the isolation authority placed their red control lock(s) and placed their keys in the blue master lock box in the permit office?						
6	Do the tags identify the person placing the lock and the time the tag was placed?						
7	Are keys for yellow personal locks kept in the sole possession of the personnel who applied the locks?						
8	Have all known sources of stored energy been drained or removed? Check how this was done.						
9	Have all isolations been individually verified and checked prior to the commencement of work?						
10	Once isolations are removed, are tags returned to the specified storage location?						
11	Have isolation authorities been trained and competent to perform isolations?						
<b>Required Action:</b>							
<b>Ref Document:</b>							
<b>Inspection Team</b>							
<b>Name:</b>		<b>Position:</b>		<b>Signature:</b>			
<b>Name:</b>		<b>Position:</b>		<b>Signature:</b>			
<b>Name:</b>		<b>Position:</b>		<b>Signature:</b>			

# PROCEDURE

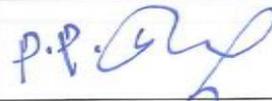
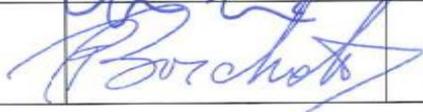
## HEALTH, SAFETY & ENVIRONMENT (HSE)

# RECOGNITION, RECOMMENDATION & REWARD FOR SAFE WORK PRACTICES



**REVISION HISTORY**

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
0	03.10.2011	First Issue and for implementation of procedure on Recognition, Recommendation & Reward for Safe Work Practices.	10.10.2011
1	12.05.2019	Re-issue for revalidation with the following changes on the contents: Update on Signatories; Replaced/re-named General Manager (GM) to Chief Executive Officer (CEO); Revised/updated contents of the procedure to reflect changes and current process within the Company; Removed/deleted provisions on Star Sticker Awards & Section on Rules on Obtaining Safety Stickers. Added new Forms- Attachments	13.05.2019

Action	Responsible	Signature	Date
Initiated by:	M. E. Edavazhikal		12/05/2019
	Y. Saleh		12/05/2019
Prepared by:	D. Guinto		12/05/2019
Checked & Reviewed by:	C.P. Gibson		12/05/2019
Approved by:	P. Borchetta		12/05/2019



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### ATTACHMENTS

Attachment No. 1: HSE AWARD NOMINATION FORM

Attachment No. 2: HSE RECOGNITION AND REWARD TRACKING REGISTER



**1.0 INTERNAL CONTROLS**

**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this HSE Procedure.

The **Health, Safety & Environment and Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

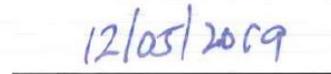
**1.2 APPROVAL**

This Procedure and any amendments made there to; require the following approvals:

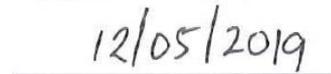
**Authority**

**Date**

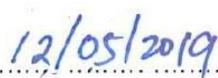
  
\_\_\_\_\_  
HSEQ Manager

  
\_\_\_\_\_

  
\_\_\_\_\_  
Chief Executive Officer

  
\_\_\_\_\_

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed  Date 



## 2.0 PURPOSE

The purpose of this procedure is to:

- a) Eliminate, prevent and control unsafe acts and conditions associated with Black Cat Engineering & Construction W.L.L. (BCEC) operations by recognizing and rewarding safe work practices, including driving and operation of vehicles and machinery;
- b) Encourage all employees of BCEC, especially site workers to perform their duties in a manner that guarantees their safety and the safety of others who are affected by their work activities;
- c) Recognize and reward those employees who have been observed to work in safe manner and according to Occupational Health and Safety rules and regulations;
- d) Discourage workers from unsafe acts/behaviors that are capable of causing injuries to themselves and others or capable of causing damage to properties

## 3.0 SCOPE

This procedure covers all site activities of Black Cat Engineering & Construction W.L.L. (BCEC) and is in line with the OHS requirements that stipulate that safety of employees must be paramount to employers of labour. It applies to all employees of BCEC and especially those working at sites, including drivers and operators of vehicles and machinery.

## 4.0 DEFINITIONS

**Zero Harm Hazard Observation (ZHO):** A card of **HSEQ Department** that is issued by HSE personnel and other key construction persons (Site Engineers, Supervisors etc) to notify of safe and unsafe acts/conditions, stop work authorities and Improvement recommendations

**Safe Work Practice:** A work practice that conforms with established Occupational Health & Safety Standards. Any work practice that employs all required and necessary precautions to eliminate all work hazards is also considered a safe work practice. This will include but not limited to:

**Safe Leadership Award.** Award given to Foreman/Chargehand/Supervisor/Engineer who leads his team safely in achieving deliverables.

**Safe Work Behaviour Award.** Award given to worker who are observed carrying out tasks in a safe manner, wear all required PPE, participates in toolbox talks & Take 5 and participates in ZHO observation.

**Safe Driver Award.** Award given to driver who performed well having no road safety violation for the month or no IVMS violation.

**Best Observation – ZHO.** Award given to personnel who made exemplary stop card observation report or hazardous unsafe act/condition reported in ZHO report card.

**Best Intervention – ZHO.** Award given to personnel who made intervention on unsafe act in the site and reported in the ZHO observation card.



**Safe Work Team.** Award given to the group who made remarkable achievement in safety or very safe work practice at site through teamwork like safe completion of a critical task or implementing controls more than required in safety permit/ certificates to ensure very safe and sound work.

## 5.0 PROCEDURE

5.1 In order to demonstrate BCEC's commitment in ensuring that safe work behaviour is recognised, all employees, hired workers, visitors to sites are eligible to qualify for recognition.

5.2 **Recognition:** When a worker is found to be engaging in safe work practices he or she can be nominated by their **Construction Supervisor, HSE personnel** or any other higher authority, he or she will be nominated for a recognition and awarded a certificate of appreciation plus a prescribed physical award in the form of shirts, Hats, Gift vouchers, BCEC badges or a significant award to a value deemed appropriate for the recognised safety action.

In the same manner, Supervisor/Foreman/Engineers can also be nominated for Safety Award by the HSE Personnel or their line managers and will also be evaluated as per their compliance and support to HSE procedures and programs.

The zero harm observations ZHO awards will be given also for:

Best safety Observation Unsafe condition/Unsafe Act – Best Intervention, Stop work authority – Best positive behaviour – Best improvement idea.

Best Safe Work Team will be given also if there is a work team that made exemplary deeds or contribution towards safe execution of project activities; in which the team members contributed in the safety and successful completion of task/activity. For example, time without Total Recordable Injury or Lost Time Injury, typically 1000,000 man hours.

**Monthly Award** – Award can either be certificate of appreciation or money/gift or both. The monthly awards could be any of the following:

- 1) Safe Leadership Award;
- 2) Safe Work Behaviour Award;
- 3) Safe Driver Award;
- 4) Best ZHO Observation;
- 5) Best ZHO Intervention
- 6) Safe Work Team Award

5.5.2 **Safe Leadership Award.** Award given to Foreman / Chargehand / Supervisor / Engineer who leads his team safely in achieving deliverables.

### 5.5.2.1 Frequency and Total number of Supervisors

**Once in a month, one (1)** Site Supervisor, Engineer, Foreman or Chargehand from BCEC and/or Subcontractor shall be recommended from each section and will be rewarded with a certificate of appreciation / recognition from the Project every month.

### 5.5.2.2 Selection

- i) Construction team/HSE personnel shall identify and nominate on monthly basis a Supervisor from his staff for the Safe Leadership Award. The worthiness of the nominated person will be verified by HSE Department.



All nominations are to be submitted to HSE Department not later than the end of 1<sup>st</sup> week of the succeeding month.

- ii) The Supervisor/Engineer/Foreman nominated must have demonstrated his leadership quality in:
- Ensuring that his team and his workers consistently carry out the work or task in accordance with safe work practices;
  - Carrying out regular Take 5 within his/her team;
  - Delivering a high standard toolbox talks for the employees working with him;
  - Immediately rectifying any safety deviation that they have observed, or which has been brought to their attention on site;
  - Playing a pro-active role in the safety, health and welfare of his team and workers;
  - Actively participating in the safety training of his subordinates or organizing / assisting in safety promotional activity;
  - Consistently motivating his workers or team to produce quality work, safely
  - Coordinating the work in harmony with other supervisors or teams from other subcontractors through Safety Walkthrough Participation
  - Reporting ZHO observations
- iii) Any Supervisor who has been the subject for disciplinary action (including verbal warning) from BCEC Project team personnel about safety matters, within those 3 months, his nomination will be passed over for those 3 months.
- iv) Should there be a Lost Time Injury resulting in days away from work for 30 days and more within the Supervisors' team of workers within the period of preceding 3 months; the Supervisor will be ineligible.

5.5.3 **Safe Work Behaviour Award.** Award given to worker who is observed carrying out tasks in a safe manner and wearing all required PPE. Safe work behavior may include a worker who has identified and rectified an unsafe condition, cleaned up his work area immediately after the work is completed, reported an observation or unsafe act/condition to his management or has reminded a colleague on safe behavior, active participation in Take 5 and submission of quality safety ZHO observations

#### 5.5.3.1 **Selection**

The names of nominated workers shall be submitted to HSE Department not later than the third day of the month. HSE Department shall verify these nominations to confirm if any of these workers have been subject to disciplinary action (which includes a verbal warning), participation in Take 5 & compliance to LSR /procedures; during that period.

Any worker who has been subject to disciplinary action will not be entitled to an incentive award for the next 3 months.

5.5.4 **Safe Driver Award.** Award given to driver who has exemplary performance in road safety having zero Road Safety Violation, No IVMS Violation doing the vehicle inspection as required and reporting unsafe act/conditions.

One award to be given every month for each Project

5.5.5 **Best ZHO Safety Observation.** Award given to an individual who reported a quality safety act/unsafe act safe condition or unsafe condition on the site ZHO Observation that help preventing near miss/ accident at site.



One award to be given every month for each Project

- 5.5.6 **Best Intervention – ZHO Stop Work Authority Observation.** Award given to an individual who made an Intervention reflected in the ZHO Observation card process that help eliminate unsafe act/condition preventing near miss/ accident at site.

One award to be given every month for each Project

- 5.5.7 **Best Safe Work Team.** Award given to a team who contributed to a safe quality outcome in eliminating unsafe act/condition preventing near miss/ accident at site or safe execution/completion of a team task without any near miss/accident; or made a safety initiative that sets apart from the rest of the group.

Award can be given if there is a qualified team that made good contribution to the HSE in the workplace. (Not necessarily be given every month).

## 6.0 NOMINATIONS

All HSE Award Nominations can be given by every HSE Officer/Engineer or Construction Site Engineer/Manager in the project area and duly conformed by the respective Site Supervisor/ Engineer and Validated by the Project Manager/Construction Manager.

HSE Award Nomination Form to be submitted end of Month not later than the 7<sup>th</sup> day or end of the 1<sup>st</sup> week of the succeeding month. See Attachment – BCEC HSE Award Nomination Form.

## 7.0 EVALUATION

HSE Leads shall evaluate the nominations per consideration with the following factors:

- No HSE Violation for the month
- Number of ZHO observations Submitted
- Feedback from Client or Other BCEC Team
- Participation/attendance in Toolbox Talks/Take 5
- Did not receive award on the previous month/s of the year

## 8.0 HSE RECOGNITION AND REWARD TRACKING REGISTER

HSE Lead shall ensure that the tracking register is maintained for HSE records (nominees' list, awardees' list) for those who were selected for awards so as not to double the awards successively and give the opportunity of awards to other personnel.

## 9.0 SOME IMPORTANT NOTES

All records related to Safe Work Practices will only be relevant in the year in which they were recognized and will not be carried over to the following year. That is, everyone opens a new beginning at the start of a new year.

Rewarding a deserving employee and way and manner to do so is at the sole discretion of **BCEC Management.**



## ATTACHMENTS



**Attachment No. 1 – HSE AWARD NOMINATION FORM**

 المكتب الأسود للهندسة والإنشاءات ذ.م.م. ENGINEERING & CONSTRUCTION W.L.L. Member of QIPCO HOLDING		
<b>HSE AWARD NOMINATION FORM</b>		
Project No:	Date:	
Project Name:	Location:	
Nomination for the month of:		
<input type="checkbox"/> Safe Leadership Award	<input type="checkbox"/> Safe Work Behavior Award	<input type="checkbox"/> Safe Driver Award
<input type="checkbox"/> Best ZHO Observation	<input type="checkbox"/> Best ZHO Intervention	<input type="checkbox"/> Safe Work Team Award
Employee/Supervisor nominated		
Name: _____	Job Title: _____	
ID No: _____	Company (if not BCEC): _____	
Contributions made towards HSE (reason for recommendations):		
Validated by Supervisor: <input type="checkbox"/> No <input type="checkbox"/> Yes		
Name/Sign of Supervisor: _____		
Recommended by (Name & Signature)		
HSE Personnel:	Site/Construction Manager	
Monthly HSE Award <input type="checkbox"/> Approved <input type="checkbox"/> Not Approved		
Reason if Not Approved		
Type of Award to be given:		
<input type="checkbox"/> Safe Work Behavior Award Certificate	<input type="checkbox"/> Cash (Amount): _____	
<input type="checkbox"/> Safe Leadership Award Certificate	<input type="checkbox"/> Gift Voucher (Amount): _____	
Validated by (Name & Signature)		
HSEQ Manager:	Project/Operations Manager:	
Acknowledgement of Award		
I, acknowledge the receipt of:		
<input type="checkbox"/> Certificate	<input type="checkbox"/> Gift Voucher	
<input type="checkbox"/> QR _____ cash + voucher	Receiver's Name:	
	Employee No.	
	Signature:	
	Date:	



**Attachment No. 2 – HSE RECOGNITION AND REWARD TRACKING REGISTER**

Attachment No.2

**BLACK CAT** | القط الأسود للهندسة والإنشاءات ذ.م.م.  
 ENGINEERING & CONSTRUCTION W.L.L.  
 Member of QIPCO HOLDING

**HSE RECOGNITION AND REWARD REGISTER**

**PROJECT NAME :**

No.	Month & Year	Name of Employee	Employee Number	Designation	Company	Discipline	Category of Award	Reason for Award	Date of Distribution

BCEC/HSE/QS-109/REV.0/12.05.2019

# PROCEDURE

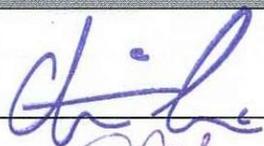
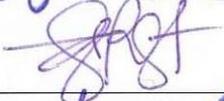
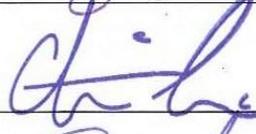
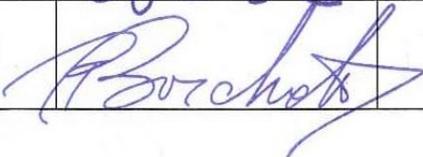
HEALTH, SAFETY & ENVIRONMENT

## HSE RISK AND HAZARD MANAGEMENT



**REVISION HISTORY**

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
0	27.01.2019	First issue and for implementation of procedure on Risk and Hazard Management.	03.02.2019

Action	Responsible	Signature	Date
Initiated by:	C. P. Gibson		27.01.2019
Prepared by:	D. Guinto		27.01.2019
Checked & Reviewed by:	C. P. Gibson		27.01.2019
Approved by:	P. Borchetta		27.01.2019

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**1.0 INTERNAL CONTROLS**

**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction, W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this Procedure.

The **Health, Safety & Environment and Quality Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

**1.2 APPROVAL**

This procedure and any amendments made thereto; require the following approvals:

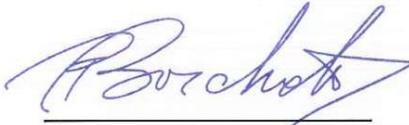
**Authority**

**Date**



27.01.2019

HSEQ Manager



27.01.2019

Chief Executive Officer

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed .....

Date .....

## 2.0 PURPOSE

The purpose of this procedure is to:

Provide for the identification, prioritization and documentation of risks, and the application of controls, as appropriate.

Identify specific hazards, assess associated risks and proper control measures to prevent the risks so that potential incidents/accidents associated with an activity will be eliminated or reduced to the barest minimum.

Have an appropriate involvement of workers or stakeholders in hazard identification, risk assessments and determination of controls.

## 3.0 SCOPE

This procedure specifies requirements for the Occupational Health and Safety Assessment Series (OHSAS 18001:2007)/ OH&S Management System (ISO 45001:2018) and Environmental Management System (EMS ISO 14001:2018) Standards. Black Cat Engineering & Construction, W.L.L. (BCEC) shall establish, implement and maintain a procedure(s) for the ongoing hazard identification, risk assessment and determination of necessary controls.

This procedure applies across all company operations including:

- Employees, Agency Personnel, and Subcontractors engaged by BCEC;
- New business opportunities; and
- Projects whether directly managed by BCEC or executed in joint venture.

This procedure is not intended to cover technical HSE risk management (e.g. safety in design) however it does describe the interface and common tools used.

## 4.0 OBJECTIVES

Management of HSE risk shall ensure:

- Hazards are systematically identified;
- Risks are assessed and prioritized using a consistent process aligned to BCEC risk management matrix;
- Specific tools for HSE risk management are utilized;
- Appropriate control measures for the hazards are determined;
- Controls are determined by applying Hierarchy of Control principles;
- Hazards, risks and controls are communicated to BCEC personnel, agency contractors and sub-contractors; and
- Programs are implemented to monitor control effectiveness – Audit and Inspection



## 5.0 DEFINITIONS

### Acceptable Risk

Risk that has been reduced to a level that can be tolerated by the organization having regard to its legal obligations and its own OH&S policy,

### Corrective Action

Action to eliminate the cause of a detected non-conformity or other undesirable situation

### Hazard

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

### Hazard Identification

Process of recognizing that a hazard exists and defining its characteristics

### Ill Health

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

### Incident

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

NOTE 1: An accident is an incident which has given rise to inquiry. Ill health or fatality.

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

NOTE 3: An emergency is a particular type of incident.

### Risk

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

### Risk Assessment

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

### Workplace

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

NOTE: When considering what constitutes a workplace, HIRA should take into account the OH&S effects on personnel who are, for example, travelling or in transit (e.g. driving, flying, on bus or trains), working at the premises of a client or customer, or working at home.

## 6.0 RESPONSIBILITIES

### 6.1 *Project Management Team (PMT)*

It is the responsibility of the PMT to:

- Ensure risk management is part of daily project management;
- Identify and rank all risks using the BCEC risk management process;
- Provide adequate training to personnel to conduct appropriate risk management;
- Ensure that corrective actions are undertaken and completed;
- Provide adequate resources to enable risk assessments to be undertaken;



- Provide personnel with procedures necessary to manage risks; and,
- Monitor and implement continuous improvement to risk management.

#### 6.2 **HSE Field Manager/HSE Project Lead**

It is the responsibility of the HSE Field Manager to:

- Ensure this procedure is reviewed periodically in line with the Company HSEQ management system requirements
- Assist and Advisor the PMT and Supervisors in the risk management processes.

#### 6.3 **Supervisors**

- It is the responsibility of the Supervisor to:
- Ensure that risk management is part of all workgroup personnel daily involvement;
- Ensure that risks of operations have been suitably assessed and controlled;
- Ensure that the control methods are adequate to control identified hazards; and,
- To continually review procedures and processes used for the operation of tasks to minimize risks.

#### 6.4 **Personnel/Workers**

It is the responsibility of all personnel/workers to:

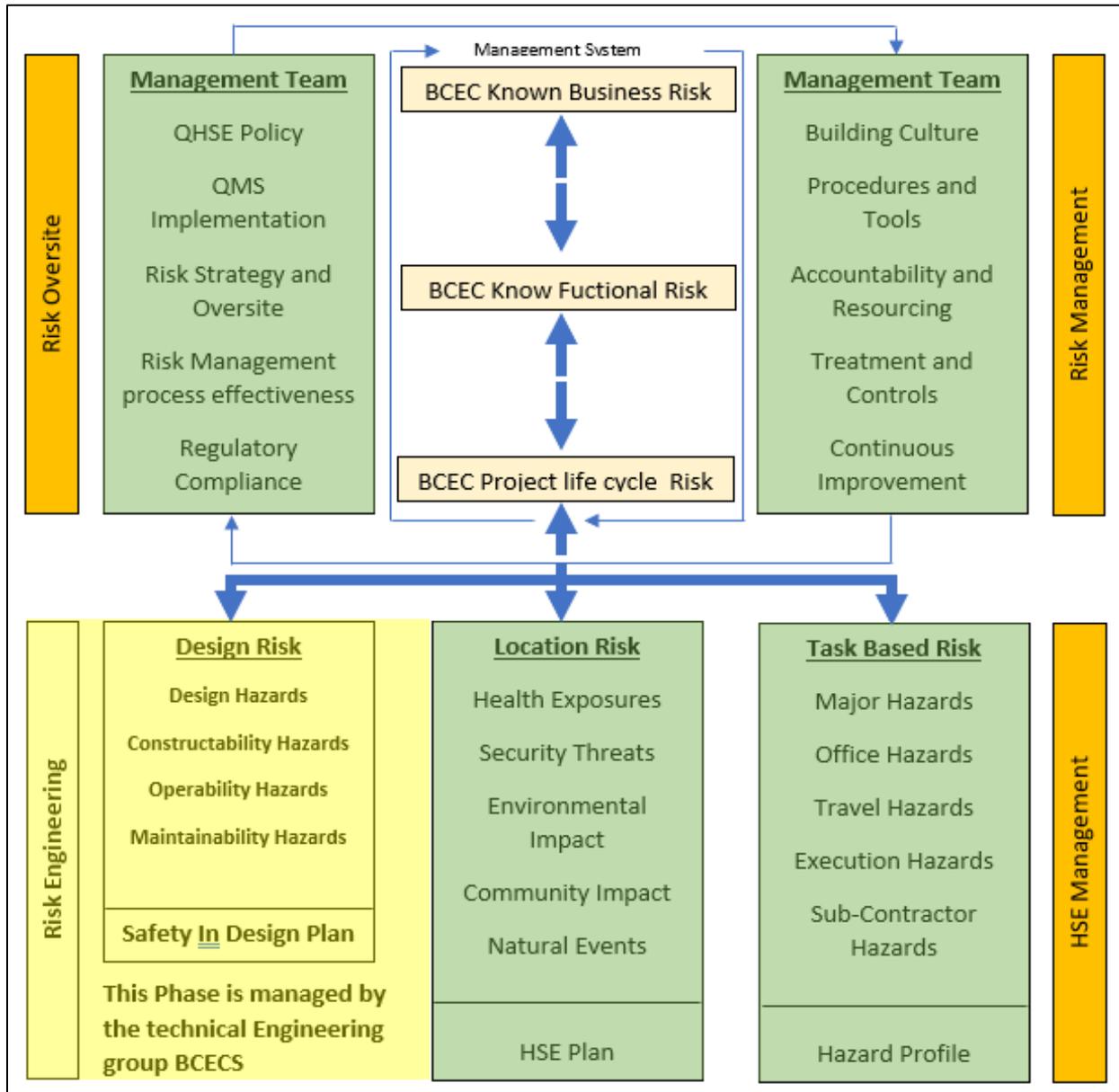
- Identify hazards and assess the risks;
- Assign control methods to minimize risk to an acceptable level; and,
- To be involved in the risk management process and the development of risk assessments.



## 7.0 RISK MANAGEMENT FRAMEWORK

HSE risks are managed at the Corporate and Business Division level with specific HSE processes applied as described in the HSE Risk Management Framework (Figure 1) to identify HSE hazards and appropriate controls. Projects shall apply this procedure in the identification, management and control of project related HSE hazards. HSE Risks are assessed using the HSE Risk Matrix. All identified project hazards must be represented in the project risk profile.

### BCEC RISK MANAGEMENT FRAMEWORK



## 8.0 PROCEDURE

Hazard identification should aim to determine proactively all sources, situations or acts (or a combination of these), with a potential for harm in terms of human injury or ill health, loss or damage to equipment assets and impact on the environment.

Hazard identification should consider the different types of hazards in the workplace, including physical, chemical, biological, psychosocial, ergonomic, radiation, electrical, environmental and physical.

HSE hazards are identified, assessed and controlled in a cascading process including assessment of business opportunities, project scopes, location of operations, through to task-based assessment. The HSE risk assessment and governance processes include the following:

- i. Design HSE risk assessment (HAZID, HAZOP, ENVID); (BCCES)
- ii. Major Hazard Management Profile
- iii. Project Hazard Identification Risk Assessment (HIRA)
- iv. Location HSE risk assessments (environment, security, health, community, natural events associated with the work location);
- v. Task based HSE risk assessment – JSA, Personal Risk Assessments; and
- vi. Work Place Inspections, Hazard Reports Cards and Lessons learned used to monitor compliance and continuous improvement.

All HSE hazard analysis process must including steps to:

- Define scope to be assessed
- Identify Hazards using the major hazard profile register
- Rank the initial risk potential
- Apply controls
- Assess the residual risks
- Review and monitor effectiveness of control strategies.

### 8.1 DESIGN HSE RISK ASSESSMENT

HSE risks arising from design and engineering of plant shall be managed by with the project engineering lead who will define the assessments to be conducted for the project scope which may include:

- HAZOP
- HAZID for design
- ENVID
- Ergonomic / Human Factor Analysis
- Constructability, Operability, Maintainability reviews.

The project HSE professional shall participate in the assessment workshops or as a minimum review the risk analysis and controls with the engineering lead to identify hazards and controls to be carried into the field execution phase of the project. The identified HSE hazards and controls to be carried into the field execution phase of the project shall be documented in the project major hazard management profile and incorporated into the project execution phase HSE Management Plan.



## 8.2 TASK BASED HAZARD ASSESSMENTS

HSE hazard assessments shall be completed for all tasks undertaken on BCEC sites using risk assessments methods appropriate to the complexity of the scope. The task based HSE hazard assessments are supported by the following programs which review and monitor the work environment and verify the application of HSE hazard controls. The HSE risk assessment tools are summarized in Table 1:

### 8.2.1 HSE HAZARD PROGRAMS

The Project Manager shall ensure the following HSE hazard management programs are implemented throughout the execution phase of the project:

- Major Hazard Management Profile
- Construction and subcontractor hazard identification risk assessments
- Supervisor work place inspections
- Hazard Report Card
- Job Hazard Analysis
- Personal Risk Assessment (Take 5)

**Table 1**

Aim of the Hazard Assessment Tools	Responsibility	
	Line Management	All Personnel
Task Based hazard identification assessment and control	Project/Construction risk assessments (HIRA) Job Safety Analysis (JSA)	Adhere Life Saving Rules Last Minute Risk Assessment (LMRA) <i>Client</i> Personal risk assessment (Take 5)
Monitoring work environment hazards	HSE Work Place Inspections	Hazard Report Cards (HRC)
Verify HSE hazards process	Management walkthroughs Risk Profile Review	

### 8.2.2 MAJOR HAZARD MANAGEMENT PROFILE

The Major Hazard profile is represented as a matrix, the matrix represents all known high potential industry hazards. The project specific hazard profile can be developed according to the hazard identification risk assessment developed by the project site team. The site team are those personnel who are most intimate the project and understand the work scope and activities (Construction Manager / Project Engineers). The project team will be supported by the assigned HSE professional.

(see attached Major Hazard Profile example template)

### 8.2.3 HAZARD IDENTIFICATION RISK ASSESSMENT (HIRA)

Threat specific HSE hazard identification risk assessments are conducted to identify and either eliminate or control project hazards. The HIRA will also include location or environment present conditions (e.g. disturbance to threatened species habitat, location of known security threat, exposure to infectious diseases). During the planning phase of a project or working in



a new location the Project Manager shall, in consultation with the HSE professional, identify threat specific HSE hazards. The HSE Hazard Identification Risk Assessments may include:

- Health Risks
- Natural Events Risks
- Security Threats
- Environmental Impact
- Potential harm to people
- Potential damage or loss
- Transportation risk

The purpose of HIRA workshops is to systematically identify and assess hazard events and, where immediately possible, identify control strategies with the aim of eliminating or reducing the hazard event to as low as reasonably practicable (ALARP). HIRA worksheets record the hazard events identified, the risk assessment of those hazard events in terms of consequence and likelihood (BCEC RAM), and controls that may be in place relating to the hazard event. The HIRA worksheets are used by the Company Project Manager and Lead Engineers prior to any work commencing to ensure that all the hazards have been identified and all controls are in place.

The content of the HIRA worksheets will be communicated to the relevant project personnel during pre-task discussion. The HIRA is to be utilized to develop task risk assessments such as the JSA.

#### 8.2.4 MANAGEMENT WALKTHROUGHS

All Project / Site / Contractor managers and supervisors shall undertake HSE Management Walkthroughs of the project work site. During the planned walks the managers should engage the workforce and through coaching methods discuss positive behavior or intervene to address unsafe behavior or conditions. All engagements are to be documented using the work place inspection checklists

#### 8.2.5 WORKPLACE INSPECTIONS

All Project / Site / Contractor managers and supervisors shall undertake inspections of the workplace to reinforce the known Project Mandatory Hazard Controls. The inspections shall also enable the identification of unsafe workplace conditions or practices. Hazard reports shall be raised where unsafe conditions cannot be resolved at the time of the inspection in accordance with Section 7.4.8 Hazard Reports Cards. Unsafe practices shall be managed using Observation and Intervention methods (Management Walkthroughs). Where personnel are observed to be in breach of a Major Hazard Mandatory Controls these shall be reported as an incident and investigated in accordance with HSE Incident Notification, Investigation and Reporting Procedure-BCEC/HSE/CP/010

#### 8.2.6 JOB SAFETY ANALYSIS

Prior to commencing work tasks, the team to perform the work shall complete a Job Safety Analysis (JSA) Ref. Procedure no. BCEC/HSE/CP/017 & BCEC/SAF/15-Job Safety Analysis, which identifies all major hazard controls applicable to the task and details the steps to perform the tasks. The JSA shall be reviewed by the supervisor confirming the work team understands the tasks and that all the hazard controls have been implemented prior to authorizing the work to commence by signing the JSA. A JSA will only be considered valid



for that one task and should always be reviewed and revised where necessary in the event of:

- A change of personnel undertaking the work;
- A change of tools, plant or equipment required to complete the work;
- A change to the working environment, i.e. in a confined space or at height;
- Where an additional hazard or risk has been identified; and
- Following an incident, injury, near miss or identifiable hazard that occurs when following the initial JSA.

### 8.2.7 ZERO HARM OBSERVATIONS

Hazard reports shall be conducted by personnel at the work site when hazards are identified as part of their normal duties. All personnel are required to identify the hazard, take remedial action to secure the work area, report the hazard to their immediate supervisor and record the details on the XXXXXX, Zero Harm Observations. The supervisor is then responsible for identifying further preventative actions and assign responsible persons. Actions from hazard reports shall be recorded in the HSE Action Tracking database until closed out. (See attached *Appendix 2 – Zero Harm Hazard Observation-BCEC/HSE/QS-002*)

### 8.2.8 TAKE 5 PERSONAL RISK ASSESSMENT

Personal risk assessments (Take 5) shall be applied by all personnel, prior to commencing the task, and following a break from the task, to identify, assess and manage local changes in:

- Work environment including adjacent activities (over, under, beside);
- Work methods;
- Equipment; or
- Work team;

and apply the specific hazard controls identified in the Job Safety Analysis (JSA). Where the Take 5 identifies local hazards are not currently assessed and managed through the JSA, a Take 5 risk assessment shall be completed using the Take 5 prompt card XXXX and Take 5 Checklist. The Take 5 risk assessment includes identification of hazards controls that apply to the task, which shall be reviewed by the immediate supervisor for confirmation that the controls have been implemented prior to commencing the task. The control measures identified through the Take 5 assessment shall be used to review and update the JSA during the next planned review. (See attached *Appendix 3 – Take 5 Prompt Card & Appendix 4 – Take 5 Checklist-BCEC/HSE/QS-087*)

### 8.3 SIMULTANEOUS OPERATION (SIMOPS)

Simultaneous Operations (SIMOPS) is defined as: performing two or more activities in a Company-controlled site where any, or all, of the activities could pose a significant risk by impacting the health and safety of personnel, the environment, assets, the schedule or performance of operations at that site. The operations could fall under individual control of another facility, business owner or project operating adjacent to Company Facilities Onshore or Offshore.

- Hazards and risks may be created if:
- There is a failure impact (leakages, releases, fire, explosion);
- Third-party interfaces, or;

Differing norms (what is normal for one entity is unacceptable to the other). Activities/operations that could create a SIMOPS scenario to be risk assessed and mitigated could be:



**The purpose of transition** – Transition planning is to layout the tasks and activities that need to take place to efficiently deliver a project from the development or pilot environment to the production, operations and maintenance environment.

**Construction Activities** – Construction activities are a broad category of work that covers a wide range of civil, mechanical, electrical, and instrumentation construction activities, both on- and near-shore.

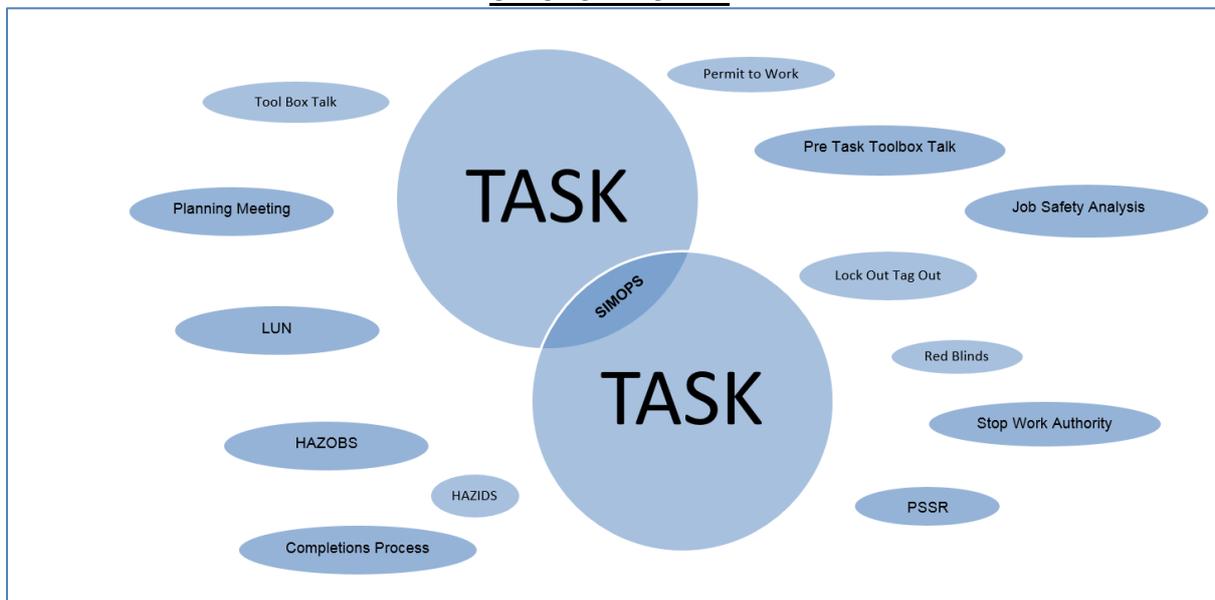
**Operations Activities** – Activities performed by Kinder Morgan plant operations personnel inside Operations controlled areas.

**Commissioning Activities** – Commissioning activities are a broad category of work that covers a wide range of multi discipline work on energized Systems.

**Brownfield Outage Tie in Works** – Construction related activities in Live Operational Areas.

**Start Up Activities** – Start Up activities are a broad category of work that covers a wide range of multi discipline work on introducing Hydrocarbons into a new plant and going through a Start Up sequence followed by Performance, Reliability and Demonstration Testing of the complete LNG Facility

#### SIMOPS DIAGRAM



#### 9.0 HIERARCHY OF CONTROLS

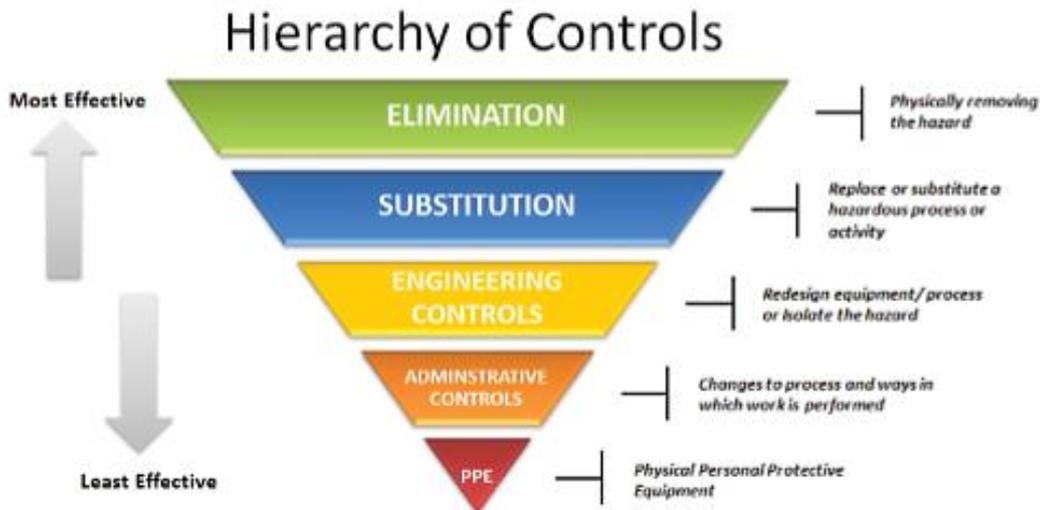
When determining controls, or considering changes to existing controls, consideration shall be given to reducing the risks according to the following hierarchy:

- elimination;
- substitution;
- engineering controls;
- signage/warnings and/or administrative controls;
- personal protective equipment



The Company and its HSE Department shall document and keep the results of identification of hazards, risk assessments and determined controls up to date.

The Company shall also ensure that the OH&S risks and determined controls are taken into account when establishing, implementing and maintaining its OH&S management system.



## 10.0 RISK ASSESSMENT MATRIX (RAM)

The BCEC risk assessment matrix is a method for evaluating both the probability and severity of a specific action or inaction that is expected or anticipated to occur. The various degrees of probability include rare, unlikely, possible, likely, almost certain. The examples of severity include insignificant, minor, moderate, major and catastrophic. Activities that are both likely and catastrophic would be considered extremely high risk, while activities that are both unlikely and minor would be considered low risk. In addition to identifying the risks, the matrix requires recommendations to minimize or eliminate these risks. (HIRA)

The risk assessment matrix can be a very valuable evaluation tool for almost any organization that has the potential for harm or injury to occur. The completion of the risk assessment matrix assists in ranking the most important to least important actions that require attention. The matrix is to be utilized to rank the risk of project activities anytime that a new project is undertaken. Once the initial assessment has been completed and agreed, utilizing the HIRA worksheets, outcomes are to be communicated to the relevant work groups that will utilize the information to complete task specific JSA's

The BCEC RAM is also utilized to classify incidents and events that occur and initiate a level of loss the company. The loss could be harm to people, impact on the environment or damage to equipment/assets. (See attached *Appendix 1 – BCEC RISK ASSESSMENT MATRIX- BCEC/HSE/QS-066*)

## 10.1 CLASSIFICATION

Incidents should be classified according to the actual outcome of the incident by the site HSE Advisor and Site Management Team, in conjunction with the HSE/Project Manager. For injurious incidents the criteria laid down by OSHA in standard 1904: General Recording Criteria shall be used. Incident types that require classification, notification investigation and reporting include:

- Fatality
- Lost Time Injury
- Restricted Duties Injury
- Medical Treatment Injury
- First Aid Injury
- Occupational Illness
- Near Miss
- Property Damage
- Environmental Incidents

Incident classification shall be classified in the first instance and may be subject to change as the situation progresses and further detail is obtained during the investigation.

## 10.2 SEVERITY EVALUATION

In addition to the actual outcome of an incident, the severity potential of the incident will be assessed to drive the correct reporting and investigation processes. Severity potential is used as an indicator for the measurement of overall safety performance and may also reveal risk reduction measures that could be in mitigating harmful effects.

Potential classification is a two-step process to identify the potential impact of an incident if there had been one additional point of failure on the chain of events. It will also identify which incidents should be reported as high potential incidents. Not all incidents will have a higher incident potential classification.

**Actual** and **Potential** Incident severity can be split into 5 distinct categories:

- i. Catastrophic
- ii. Major
- iii. Moderate
- iv. Minor
- v. Insignificant

The first step is to plot the actual incident classification on the severity matrix and evaluate the event sequence of the incident and the safeguards involved. To then establish the potential outcome, it is necessary to determine the outcome if one additional safeguard had failed.

Having dealt with the immediate consequence of an incident, the activity supervisor and any other necessary personnel (Site Management/Site HSE Lead) must carry out an initial assessment of severity potential based on their understanding of events at that time. The assessment may be altered later, based on the findings of investigations for example; however, it is necessary at an early stage as a key consideration in the response to an incident.



## 11.0 REFERENCE DOCUMENTS

Procedure Title	Procedure/Document No.
Internal Audit	BCEC/IMS/002
Performance Measurement, Monitoring, Evaluation	BCEC/IMS/008
Hazard Identification & Risk Assessment (HIRA)	BCEC/HSE/CP/016
Job Safety Analysis (JSA)	BCEC/HSE/CP/017
Environmental Aspect & Impact	BCEC/HSE/CP/024

## 12.0 MEASUREMENT AND VERIFICATION

### 12.1 QUALITY ASSURANCE

Corporate HSE will be involved in regular safety inspections and planned HSE audits. Prior to commencement of the project. BCEC shall implement a QHSE audit and inspection schedule. This will include audits conducted internally and those done by Third Party.

### 12.2 WORKPLACE INSPECTIONS

BCEC are committed to establishing a regular consistent approach to work place inspections to ensure that our operations are maintaining a high standard of compliance. The inspections are to be completed daily during high activity periods to provide HSE assurance. The BCEC management team will also be involved in monthly Safety walkthrough to ensure the senior management leadership is actively involved with the engagement process. The walkthrough process will be coordinated by the Corporate HSE Coordinator with a set schedule agreed by senior management.

(See Appendix 5 Work Place Inspection example)

### 12.3 KEY PERFORMANCE INDICATORS

BCEC shall implement both “Lead and Lag” indicators to monitor the effectiveness of and compliance with the HSE management program.

HSE performance against these set KPI’s will be reported each week. In addition to weekly reporting of the above KPI’s a monthly report detailing and consolidating the HSE performance for the month is also submitted to Corporate HSE.

#### 12.3.1 KPI PROCESS

Zero Harm Hazard Observations & Interventions (ZHO) – This is the Hazard Report Card process expected of all personnel. This includes hazard observations, positive observations, improvement suggestions and stop work authority.

Zero Harm Work Place Engagement (Task Specific, TBT – Take 5) This process is essentially the pre-start engagement where project management team up with supervision and HSE officers to attend and get involved in the task TBT and Take 5 prior to the commencement of the work

Zero Harm Work Place Inspections (WPI) – The Work Place Inspections have been developed around the key BCEC and Client procedures. They are to be completed by the discipline leads, engineers and the HSE advisors with the task supervisors.



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Risk Assessment (JHA/Take 5) – The risk analysis process is complete for all permit tasks and some routine tasks. This is a fluid total with the daily totals changing with the number of permits raised for the day.

Weekly Scheduled HSE Walkthrough – These projects organized HSE engagement and assurance sessions are held on each project weekly. They are specifically for senior company management to get involved with site safety interaction with the work force + allow for a high-level assurance check.

(See Appendix 6 Key Performance Indicators Example)



## APPENDICES



## Appendix 1 – BCEC RISK ASSESSMENT MATRIX

BCEC RISK ASSESSMENT MATRIX (RAM)						
CONSEQUENCES						
PROBABILITY	Descriptor	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
	Almost Certain (5)	9	16	18	23	25
	Likely (4)	4	11	17	20	24
	Possible (3)	3	10	13	19	22
	Unlikely (2)	2	6	12	14	21
	Rare (1)	1	5	7	8	15
RISK LEVELS		HSE RISK RESPONSE GUIDE				
Very High	23	25	This is an unacceptable level of risk. Immediate action is required to identify control measures to reduce risk to ALARP.			
High	16	22	Immediate action is required to identify control measures to reduce the risk to ALARP. Work can only progress at this residual risk level with the approval of the BCEC CEO			
Moderate	9	15	Further action is required to identify control measures to reduce the risk to ALARP. Work can only progress at this residual risk level with the approval of the senior site representative			
Low	2	8	Ensure no further control measures are required to demonstrate that the risk is ALARP. Responsible senior BCEC site representative to ensure all identified control measures are in place prior to the work progressing			
Very Low	0	1				
HSE CONSEQUENCE / SEVERITY TABLE						
Consequence	Health & Safety	Environmental Impact	Asset Loss or Damage	Business Risk	Fanatical Impact	
Catastrophic	Multiple fatalities. Multiple serious disabling injuries	Release of pollutants capable of causing irreversible environmental harm requiring national/international resources for remediation	Massive Damage	Company prosecuted. Loss of future work. Project shutdown. Violation of company policy. Widespread dissatisfaction resulting in legal action	>\$30 Million	
Major	Single fatalities, serious injury resulting in permanent disability. Multiple injured parties	Release of pollutants to sensitive areas. Immediate offsite contamination requiring state or regional external resources for remediation Long term impact (1-6 months)	Major Damage	Adverse national media coverage. Significant reduction in customer satisfaction. Threat to project success with potential for legal action	\$10M - \$30M	
Moderate	Lost time injury Restricted Work Day Injury reportable to regulatory body	Environmental harm reportable to government authority. Breach of license conditions/lease. Onsite contamination with the potential to cause offsite contamination. Medium to long term (1-6 months)	Moderate Damage	Local media coverage. Failure causing customer dissatisfaction with moderate delay. Rework or extra work requiring additional resources. Client forced to impose penalties	\$2M - \$10M	
Minor	Medical Treatment First Aid treatment	Minor on site pollution not within the confines of the protected areas. No long term impact. Clean up within 1 month	Minor Damage	Telephone or written complaints. Failure causing slight customer concern and inconvenience. Resolved with current levels of resources	\$50K - \$2M	
Insignificant	No treatment required	Localized contained impact immediate completed fix. Clean up	Slight Damage	Minimal or no impact to project delivery	Less than \$50K	
PROBABILITY						
Probability	Descriptions					
Almost Certain	This event is expected to occur is known to have occurred frequently at BCEC in similar situations					
Likely	This event may occur or is known to have occurred at BCEC in similar circumstances					
Possible	This event might occur or is known to have occurred at BCEC in additional circumstances					
Unlikely	This event could occur or is known to have occurred in the industry but not at BCEC					
Rare	This event may only occur in exceptional circumstances or is not known to have occurred in the industry					

BCEC/HSE/QS-066/REV.0/12.12.2018



**Appendix 3 – TAKE 5 PROMPT CARDS**

**FRONT**



**BACK**





**Appendix 5 - WORK PLACE INSPECTIONS (EXAMPLE)**

BLACK CAT		LOCATION: _____					
BLACK CAT		DATE: ____ / ____ / ____ Time: _____					
WORKPLACE INSPECTION ENGAGEMENT		ELEMENT NO. 2 LINE OF FIRE PREVENTION					
A = Acceptable		NI = Needs Improvements		UA = Unacceptable		N/A = Not Assessed	
No.	ITEM	COMPLIANCE ACHIEVED				COMMENTS	
	PTW Number: _____	A	NI	UA	N/A		
1	Has a Toolbox Talk (TBT) and last minute risk assessment (LMRA) been carried out to reflect the task and identify any additional hazards prior to commencement?						
2	Does the the JHA identify line of fire hazards? Are controls adequate?						
3	Has appropriate barricading, signage or spotters been put in place to prevent unauthorized access?						
4	Have personnel identified instances where a suspended load may swing, when being lifted or lowered?						
5	Has a drop zone been established under any work being performed at height?						
6	Have all tools and equipment been prevented from falling by those working above?						
7	Are tool bags and hand lines being used to lift / lower tools and equipment?						
8	Are workers aware to stay well clear of tensioned lines, such as chain or cable and rope?						
9	Are the tools being used in good condition and fit for the task?						
10	Are personnel placing themselves between items that could dislodge or fall?						
11	Are people working with pressurized tools aware of stored energy hazards?						
12	Could the contents of a pressurized system be released due to a planned activity? Boundaries established during leak testing?						
13	Are controls in place when working near equipment with parts that can move / rotate unexpectedly?						
14	Are personnel aware of trapping / crush hazards?						
<b>Required Action:</b>							
<b>Ref Docs:</b>							
<b>Inspection Team</b>							
Name:		Position:		Signature:			
Name:		Position:		Signature:			
Name:		Position:		Signature:			

## Appendix 6 – KEY PERFORMANCE INDICATORS (EXAMPLE)

Aim		Output	
Lead	Hazard Report Cards Observations & Interventions	1 per week	All site personnel
	Work Place Engagement (Task Specific, TBT – Take 5)	1 per day	Project Mangers, Engineers, HSE Team and Supervision. (Including Corporate Managers when on site)
	Work Place Verification Inspections	1 per Week	Project Mangers, Engineers, HSE Team and Supervision (Including Corporate Managers when on site)
	Participation in Weekly Management HSE Walkthrough	1 per Week	Senior and Project Management
	Risk Assessments (JHA-Take 5)	1 per permit	Workgroup
	Training Plan/Matrix Compliance/On boarding	100% of all relevant personnel	
	HSE Responsibilities Workshops	100% of all relevant personnel (Project Management)	
Lag	Total Recordable Incident Frequency Rate (TRIFR)	< 0.7	
	Total Recordable Lost Time Accident Frequency Rate	< 0.20	



# PROCEDURE

HEALTH, SAFETY & ENVIRONMENT

## HEALTH SAFETY AND ENVIRONMENT (HSE) COMMITTEE CHARTER





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**1.0 INTERNAL CONTROLS**

**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this Safety Procedure.

The **Health, Safety, Environment & Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

**1.2 APPROVAL**

This procedure and any amendments made thereto; require the following approvals:

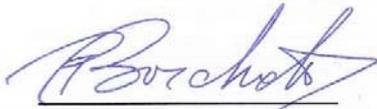
**Authority**

**Date**



03/10/2018

HSEQ Manager



03/10/2018

Chief Executive Officer

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed .....



Date .....

02/10/2018



## 2.0 PURPOSE

To provide active participation and cooperation between Black Cat Engineering and Construction W.L.L (BCEC) management and employees in controlling work conditions and practices and a forum for consultation and dissemination of information on matters which are likely to affect welfare of BCEC employees; in accordance with the requirements of the Occupational Health and Safety Act 2004 (OHS 2004).

## 3.0 SCOPE

The scope of the Committee involves:

- OHS training and education of employees, Committee members, HSR and DHSR. Monitoring and review of workplace inspections, workplace hazards, incidents, injuries and investigations;
- Developing and reviewing risk assessments and risk controls;
- Reviewing safe work procedures (SWP);
- Reviewing any purchasing checklists/guidance for items with OHS implications;
- Developing safety rules and information;
- Reviewing emergency procedures and drills.

## 4.0 DEFINITIONS

**Health and Safety Representative (HSR):** A nominated employee responsible for representing employees within a Designated Work Group (DWG) on matters relating to occupational health and safety (OHS) in the absence of the Health and Safety Representative (HSR).

**Designated Work Group (DWG):** A group of employees in the workplace who share similar workplace health and safety concerns and conditions.

**Management OHS Nominee:** A position nominated by the Workplace Manager to oversee the operational aspects of implementing health, safety and wellbeing initiatives, policies and procedures.

**Workplace/Discipline/Function Manager:** The Manager or Principal responsible for the workplace and has a level of responsibility to endorse actions and recommendations.

## 5.0 FUNCTIONS

The functions of the Committee are to:

- Review measures taken to ensure the health, safety and welfare of persons at BCEC corporate head office;
- Investigate any matter that may be a risk to the health, safety and welfare of persons at BCEC corporate head office;
- Ensure that information pertaining to the function and role of the Committee is formulated, reviewed and disseminated to all employees (in other languages if appropriate) at BCEC corporate head office.



## 6.0 DECISION MAKING PROCESS

The Committee has the power to make recommendations to the workplace management relating to any matters listed under Scope above or any other matters set out in the OHS legislation. The Committee does not have the power to implement those recommendations. Should a Committee recommendation be rejected by the Workplace Manager the Committee may elect to follow the workplace's agreed OHS Issue Resolution Process.

## 7.0 MEMBERSHIP

It is a requirement that there be at least two representatives of management. Management representation will be appointed by the Workplace Manager and/or the Management OHS Nominee. The Committee comprises:

A minimum of 3 employee's representatives as nominated by the work group, and a minimum of one employer representatives as nominated by the Workplace Manager and/or the Management OHS Nominee. The term of office for employee Committee members is one year. Employee representatives may resign from the Committee at any time. Resignation must be by written notification to the Chair of the Committee. Management representatives may request to resign from the Committee by written application to the Workplace Manager and/or the Management OHS Nominee. The Workplace Manager and/or the OHS Management Nominee shall decide to accept the resignation and appoint a new representative or to reject the resignation. Any Committee member who resigns from BCEC will automatically be removed from the Committee.

## 8.0 OFFICE HOLDERS OF THE COMMITTEE

The Chairperson, Deputy Chairperson and Secretary will be elected by the Committee. In the absence of the Chairperson, the Deputy Chair must act as the Chairperson. In the absence of the Secretary, another Committee member may act as the Secretary. Chairperson responsibilities include:

- Chairing Committee meetings;
- Referring recommendations made by the Committee to management for consideration and reporting the outcomes of such deliberations back to the Committee;
- Ensuring that actions arising are aligned to a responsible person within an agreed timeframe;
- Ensuring that any actions are finalized and signed off in a timely fashion;
- Reviewing and signing off on meeting minutes before distribution.

### Secretary responsibilities include:

- Scheduling the meeting times and locations and notifying Committee members of the schedule;
- Preparing and distributing the meeting agenda at least one week prior to the meeting;
- Displaying the Committee agenda on the OHS Notice Board at least one week prior to the meeting;
- Taking notes of the meeting and preparing the minutes of the meeting;
- Distributing the meeting minutes and other correspondence to all committee members;
- Ensuring that the meeting minutes are displayed on the OHS Notice Board and stored in the OHSMS Documentation File.



## 9.0 MEETING

### Meeting:

Meetings shall be held at 11AM in the level three meeting cubicle on the 4<sup>th</sup> Thursday of every month. If a vote is necessary for matters that cannot be resolved by discussion in the Committee, each member may cast one vote and the matter will be resolved according to the majority vote. In the event of a tie, the Chairperson will cast the deciding vote. An extraordinary meeting may be called by:

Committee Chairperson  
Half of the Committee members  
The Workplace Manager and/or the Management OHS Nominee.

### Attendance:

Attendance of Committee Members Committee members will cease to be a member of the Committee if they:

Resign from the Committee (subject to the guidance above)  
Fail to attend 3 consecutive meetings without providing apologies to the Chairperson  
Resign from BCEC employment.

### Quorum:

A quorum of members must be present before the meeting can proceed. A minimum of 3 employee representatives and 1 management representatives must be present to make up a quorum for the meeting to proceed.

### Attendance at the meeting from nonmembers:

Any person with special knowledge of a particular matter or supervisor in charge of a particular area may attend by invitation from the Chairperson or by request to the Chairperson in writing as an invited guest. An invited guest does not have voting rights on the Committee and may be requested to leave at any time by the Committee Chair. Observers, such as employees from the DWG? may attend at the discretion of the Committee as invited guests.

## 10.0 PROCEDURE FOR CHANGING THE CHARTER

The Committee Charter shall be reviewed annually from the date of approval. Any proposal to amend or change the Committee Charter must be tabled at the Committee meeting with agreement of the majority committee members. This Committee Charter has been agreed to by:

- Workplace Manager and/or Management OHS Nominee
- Chairperson (on behalf of the Health and Safety Committee)



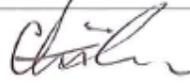
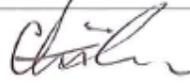
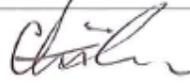
**11.0 EXAMPLE OF MINUTES**

		<b>MONTHLY HSE COMMITTEE MEETING</b>		No.: 02	
<b>Minutes of Meeting</b>					
Date: 26-Sep-2018		Time: 11:00 – 11:45		Venue: BCEC Office, 3 <sup>rd</sup> floor	
<b>Attendees:</b>					
<ol style="list-style-type: none"> <li>1. Clinton Gibson (CG) – HSEQ Manager</li> <li>2. Mohamad Awada (MA) – HR Manager</li> <li>3. Krishna Rana Bhat – (KB)</li> <li>4. Prakash Poudel – (PP)</li> <li>5. Sudheesh Kumar – (SK)</li> <li>6. Nithya Kumar – (NK)</li> <li>7. Amir Hussain – (AH)</li> <li>8. Binshad K.V – (BK)</li> <li>9. Jerry Francis - (JF)</li> </ol>					
Next Meeting: 31/10/2018		Time: 11:00		Venue: BCEC Office, 3 <sup>rd</sup> floor	
Minute Prepared by :		Jerry Francis			
S. No	Topics			Action by	
1	CG – Welcomed all members to the 2 <sup>nd</sup> HSE Committee meeting			Info	
2	CG – Informed that he will circulate the charter for the committee's review.			CG	
3	<b>Open Items from Last meeting:</b> 1. <u>Maintaining temperature in office areas.</u> CG – Asked whether the normal temperature is maintained in office areas. NK – Replied that issue has not yet resolved and still it's too cold. Discussion were made and decided to switch off the air condition daily after the working hours and to switch on by 6:00 hrs in the morning. Also during the weekends, it shall be switched off. 2. <u>Space for taking lunch in office:</u> NK- Appreciated management for solving the issue by arranging an eating area at the 2 <sup>nd</sup> floor It was recommended by the team to have similar space at all levels to take lunch MA – Informed that currently there is no vacant spaces at other levels to arrange such area, but definitely company will take it in consideration and look for other possibilities in the future. CG – Added that we will try to expand the same facility to other floors also.				
4	<b>Waste Management:</b> CG – Informed that the arrangements for waste segregation and disposal at office is almost completed. Bins for disposing plastic and cans are already in place on each floor.				



BLACK CAT   القط الأسود للهندسة والإنشاءات د.م. ENGINEERING & CONSTRUCTION W.L.L. Member of OIPCO		<b>MONTHLY HSE COMMITTEE MEETING</b>	No.: 02
S. No	Topics	Action by	
	<p>Big green skips are placed in the basement for collecting the wastes which will be emptied by 3<sup>rd</sup> Party company upon our request.            Waste recycling and life cycle process is the requirement of ISO 14001:2015 and therefore all should follow the waste management process</p> <p>Suggestion came up to provide more bins for disposing plastic and bottles in office</p> <p>MA – Informed that the use of plastic bottles and cans is very less and therefore it is enough to maintain the current number of bins</p>	All	
5	<p><b>Head office Inspection:</b>            CG – Asked whether the head office building inspections are carried out as per schedule and is there any findings.            SK – Informed that there is no sign posted near the fire extinguisher placed at Procurement department.            CG- Informed JF to provide required signage at the area</p>	JF	
6	<p><b>Monthly Fire Extinguisher Inspection:</b>            JF – Informed that currently we are bringing employee from Dukhan to conduct monthly fire extinguisher inspection. Therefore, suggested to provide Fire Extinguisher training to our office boys so that we can utilize them to do the monthly inspection of fire extinguishers within office and staff accommodation.            MA – Agreed, and asked JF to discuss with admin department to identify the employees and send for training</p>	JF	
7	<p><b>Issues discussed:</b></p> <p>1. NK – Suggested to make the salary cut-off date same like before which was from 15<sup>th</sup> to 15<sup>th</sup> of the month, if possible. Because of the current salary calculation dates, salary is being delayed which is effecting employees in paying the house rents, loan payments etc.            MA – Replied that the salary delay is not due to the delays happening to process the timesheets through HR, payroll and other departments. Even with the current cut-off dates the timesheets are processed within 3 days. He informed that employees are not submitting the timesheets on time even after circulating the memo. He also added that when we were following the previous cut-off dates, it was difficult to do the costing and close the book for the month.</p> <p>2. JF – Enquired about the health and safety of the employee who has undergone operation and staying in the accommodation.            MA – Informed that it was our staff nurse who diagnosed the disease at the early stage and we were able to give him treatment on right time and company has done everything that is possible to make him safe. Patient has undergone operation and currently he has given separate room with attached toilet and there is improvement in his health condition.</p>	Info	



		<b><u>MONTHLY HSE COMMITTEE MEETING</u></b>	No.: 02						
<b>S. No</b>	<b>Topics</b>	<b>Action by</b>							
	<p><b>General Discussion:</b></p> <p>MA – Asked everyone to follow the official web page of company as there is one more web page available in social media which is created by someone which is not an official page of the Company. He also informed that we have raised complained to delete the duplicate web page and hope it will be removed soon.</p> <p>MA – Informed everyone to maintain the work area neat and clean at all times. There will be office visits by some of the clients in coming days and it is important to keep our office neat and tidy. Also reminded everyone to speak up if you see anything wrong.</p>	Info							
8	CG – Thank all for coming and giving inputs during the meeting.	Info							
9	Meeting Attendance sheet (As attached)	N/A							
<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 33%;">Name</th> <th style="width: 33%;">Designation</th> <th style="width: 33%;">Signature</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Clinton Gibson</td> <td style="text-align: center;">HSEQ Manager</td> <td style="text-align: center;"></td> </tr> </tbody> </table>				Name	Designation	Signature	Clinton Gibson	HSEQ Manager	
Name	Designation	Signature							
Clinton Gibson	HSEQ Manager								

# PROCEDURE

INTEGRATED MANAGEMENT SYSTEM (IMS)

## INTERNAL AUDIT

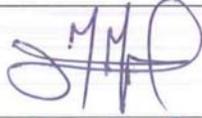


### REVISION HISTORY

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
5	05.05.2010	QHSE Procedure Manual revised as per ISO 9001:2008	12.05.2010
6	04.12.2013	Re-validated with minor changes to comply with ISO 14001:2004 standard; Revised the following sections: - 2.1, 3.1 & 5.2; Added the following items: - 7.2. & 7.3; Revised the following attached forms: - BCEC/QS/11/Rev.3-Non Conformity Report - BCEC/QS/11A/Rev.2-Audit Non Conformity Report.	09.12.2013
7	22.05.2016	Re-issue with minor changes on the contents. Update on Signatories; Replaced/re-named Executive General Manager (EGM) to Chief Executive Officer (CEO) and Office wherever mentioned in the whole procedure document; Added item no. 7.4; Revised 8.0.	29.05.2016
8	16.08.2018	Revised to comply with new version of ISO 9001:2015 & ISO 14001:2015 Standards.	16.08.2018
9	20.02.2019	Revised/updated contents of the procedure to reflect changes and current process within the Company; Clarified some previous sections and added several new sections to better address the requirements of Company's IMS (Integrated Management System); Revised and added new Internal Audit Forms as Attachments.	27.02.2019



Procedure No.: BCEC/IMS/002  
Effective: 27.02.2019  
Issue Date: 20.02.2019  
Revision No.: 9

Action	Responsible	Signature	Date
Initiated & Prepared by:	D. Guinto		20/02/2019
Checked & Reviewed by:	M. Villanueva		20-2-19
	M. Mansour		20-2-19
	C.P. Gibson		20/02/2019
Approved by:	P. Borchetta		20/02/2019



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### APPENDICES

- Appendix 1: Internal Audit Process Flowchart Audits**
- Appendix 2: Corrective Actions and Close Out Report Flowchart**
- Appendix 3: Auditors Skill Matrix (Qualification Requirements)**
- Appendix 4: Classification of Audit Findings Matrix**

### ATTACHMENTS:

- Attachment No. 1: BCEC/IMS/002/F-001/REV.XX-Audit Annual Plan**
- Attachment No. 2: BCEC/IMS/002/F-002/REV.XX-Audit Notification & Program**
- Attachment No. 3: BCEC/IMS/002/F-003/REV.XX-Audit Report & Checklist**
- Attachment No. 4: BCEC/IMS/002/F-004/REV.XX-Audit Close-out Report**
- Attachment No. 5: BCEC/IMS/002/F-005/REV.XX-Audit Non-Conformity Report**
- Attachment No. 6: BCEC/IMS/002/F-006/REV.XX-Audit Findings Register**
- Attachment No. 7: BCEC/IMS/002/F-008/REV.XX-Audit Attendance Register**

**Note:** XX indicates current Revision number at the point of use



## 1.0 INTERNAL CONTROLS

### 1.1 VALIDATION

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this Procedure.

The **Health, Safety, Environment & Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

### 1.2 APPROVAL

This procedure and any amendments made thereto; require the following approvals:

**Authority**

**Date**

  
\_\_\_\_\_  
HSEQ Manager

20/02/2019

  
\_\_\_\_\_  
Chief Executive Officer

20/02/2019

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed .....



Date .....

20/02/2019



## 2.0 PURPOSE

The role of internal audit is to provide independent assurance that an organization's risk management, governance and internal control processes are operating effectively.

This procedure has been established to provide guidance on auditing process, including the principles of auditing, managing an audit programme and conducting management system audits to verify that Black Cat QHSE Management Systems are in compliance with ISO 9001, ISO 14001 & OHSAS 18001 (ISO 45001) and that practices are in compliance with Company's documented QHSE Management Systems.

This procedure documents the key steps to be followed in conducting audit, reviewing conformities, non- conformities, monitoring corrective actions and providing a system for tracking the notification and close out of NCR's and other audit findings.

## 3.0 SCOPE

This procedure is applicable to all Quality and HSE procedures and documents used in Black Cat activities and operations.

The scope of this procedure is to focus on assessing the effectiveness of Black Cat's Quality, Occupational Health & Safety (OH&S) and Environmental management systems. Where such processes found to be deficient, the audit will lead to improvement in those processes. By applying the principles of auditing, outlined by ISO Standards, Black Cat ensures that all internal and external audits are conducted with due professional care, integrity and independence. All conclusions derived from the audit will be based upon objective and traceable evidence.

## 4.0 RESPONSIBILITIES

### 4.1 *HSEQ Manager*

- It is the responsibility of the HSEQ Manager to oversee the audit process and to ensure that they are conducted in an efficient manner.
- Overall responsible for ensuring that all data pertaining to the Quality, Health, Safety and Environment (QHSE) Management Systems are examined, to determine the cause of the concern, to ensure that corrective actions are taken to rectify non-conformities and to prevent its occurrence.
- Provide trainings to HSE Auditors

### 4.2 *QA Manager*

- Responsible for ensuring that all data pertaining to the Quality Management Systems (ISO 9001) are examined, to determine the cause of the concern, to ensure that corrective actions are taken to rectify non-conformities and to prevent its occurrence.
- Provide trainings to QA Auditors

### 4.3 *IMS Lead Auditor*

- Prepares and endorses the Audit Annual Plan to the QA Manager and HSEQ Manager for approval;



- Leads/manages the implementation of audit;
- Maintain a system for reporting audit results;
- Determine the root causes of non-conformities;
- Determine conformity to planned arrangements;
- Determine proper implementation and maintenance of audit procedure;
- Provide the results of audits to top management;
- Review the effectiveness of corrective actions taken;
- Coordinates audit schedule to Projects and Departments;
- Liaise to external auditor/auditing body;
- Responsible for update of the Non-Conformance Report (NCR) Register and Close-out Report (Department/Project) and notification/follow-up to relevant parties.
- Ensure Internal Audits are scheduled and conducted as specified in the Audit Plan.
- Maintains the records of the documented information related to audit.

#### 4.3 **Internal Auditors (Audit Team)**

- It is the responsibility of the **Internal Auditors** to conduct the Internal Audits (QHSE) in accordance with this procedure as delegated by IMS Lead Auditor;
- Carry out the audit and coordinate to IMS Lead Auditor during audit process the audit findings;
- Prepare the necessary tools to be used for the audit;
- Prepares individual audit report of the audited management system to be reviewed and approved by Lead Auditor/ QA Manager and HSEQ Manager prior issuance.

#### 4.4 **Heads/Process Owners (Auditees) also refer to as Department Managers/Project Managers/ Functional Heads)**

- It is the responsibility of the concerned **Heads/Process Owners (Auditees)** to take action on non-conformities without undue delay;
- Ensure that corrections and corrective actions are carried out without undue delay;
- Ensure completeness of Close-out Audit Report;
- Ensure that all NCRs issued to his/her project/department is properly responded, and that documented information is retained.

The assigned **Project Manager** is the coordinator for internal audits at project site and office and assigned **Department Manager/Head/Process Owner** of each department is the coordinator for internal audits at the head office.



## 5.0 DEFINITIONS/ABBREVIATIONS

Term Used	Definition
Black Cat / Company	Black Cat Engineering & Construction W.L.L. (BCEC); Black Cat Consulting & Engineering Services W.L.L. (BCCES)
QHSE Management Systems	Quality, Health & Safety and Environment; Organizational structure, procedures, processes and resources needed to implement and maintain Quality and HSE management systems.
IMS	Integrated Management System
Audit	A systematic, independent, and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled
Audit Programme	Set of one or more audits planned for a specific time frame and directed towards a specific purpose
Audit Plan	Description or calendar of the activities and arrangements for an audit
QA Manager	Manage the overall Quality Assurance performance
IMS Lead Auditor	A designated lead auditor to manage the Quality and HSE audits and leads the audit team
Internal Auditors (Audit Team)	The Audit team composed of employees from QA/QC and HSE departments who are individually trained and qualified to perform audit based on ISO 9001, ISO 14001 & OHSAS 18001 (ISO 45001)
Auditee/Interviewees	Department/Project/Person being audited
Objective Evidence	Records or statements of fact, which can be verified
Audit Findings	Results of the evaluation of the collected audit evidence against audit criteria; Audit findings can indicate either conformity or nonconformity with audit criteria or opportunities for improvement.
Non-conformance/ non-conformity	Non-fulfilment of specified requirements
Conformance/Conformity	Fulfilment of a requirement
Observation	A statement of fact made during an audit and substantiated by objective evidence
Opportunity for Improvement (OFI)	An observed situation which is not a nonconformity but where the results achieved may not be optimal, less than well-organized, or over complicated



Term Used	Definition
Corrective Action	An action planned or taken to stop something from recurring
Root Cause Analysis (RCA)	A root cause is a factor that caused a non-conformance and should be permanently eliminated through process improvement. Root cause analysis is a collective term that describes a wide range of approaches, tools, and techniques used to uncover causes of problems. It is an approach for identifying the underlying causes of an incident or problem so that the most effective solutions can be identified and implemented.

## 6.0 PROCEDURE

### 6.1 OVERVIEW OF THE AUDIT APPROACH

6.1.1 The Company shall conduct internal audits at planned intervals to provide information on whether the QHSE management systems conforms to the organization's own requirements for its QHSE management systems and the requirements of the ISO Standards; and is effectively implemented and maintained.

Referenced to Clause no. 9.2.2 of ISO 9001, ISO 14001 & ISO 45001, the Company shall:

- plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned, changes affecting the organization, and the results of previous audits;
- define the audit criteria and scope for each audit;
- select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;
- ensure that the results of the audits are reported to relevant management;
- take appropriate correction and corrective actions without undue delay;
- retain documented information as evidence of the implementation of the audit programme and the audit results.

6.1.2 The Audit team should expect the audit planning document to set out that the audit plan has been developed by:

- taking account of the risks identified by the organization in its risk register and other documents;
- using the internal auditor's experience of the organization and more generally to identify other areas of risk which may warrant attention; and
- discussing all identified risks and other relevant issues with the organization's management to identify the potential scope of internal audit.

6.1.3 To ensure impartiality and objectivity, the Internal Auditor, or Internal Audit Team will include personnel from departments not directly associated with the area, process or department being audited. The Internal Auditor, or Internal Audit Team, cannot have any operational responsibility to achieve audit objective insight. They cannot audit their own work without having a definite conflict of interest. The auditor should be independent from the function being audited, by providing an independent and unbiased view, the internal audit function adds value to the organization.



The Internal Auditor, or Internal Audit Team should have the required training and work experience as specified in the 'Auditors Skill Matrix' attached as *Appendix 3* of this procedure.

#### 6.1.4 Risk-focused internal audit coverage

Where the organization's risk management policy allocates each risk a likelihood and impact rating between 'high' and 'low', the audit plan might for example focus on 'high' and 'medium' priority risks over identified period of time or year.

The audit team should be fully informed of:

- a) which areas are being addressed;
- b) how many audit days have been allocated to each area;
- c) when the fieldwork is being undertaken; and
- d) when the internal auditors will report their findings.

#### 6.1.5 All elements and sub-elements of the ISO 9001, ISO 14001 and OHSAS 18001 (ISO 45001) Standards shall be covered in the IMS internal audit schedule.

#### 6.1.6 An audit can be conducted against the following audit criteria, separately or in combination, including but not limited to:

- a) requirements defined in one or more management system standards;
- b) policies and requirements specified by relevant interested parties;
- c) statutory and regulatory requirements;
- d) one or more management system processes defined by the organization or other parties;
- e) management system plan(s) relating to the provision of specific outputs of a management system (e.g. quality plan, project plan, HSE plan).

### 6.2 DEVELOPING THE INTERNAL AUDIT PROGRAM

#### 6.2.1 In developing the IMS Internal Audit Program, the IMS Lead Auditor shall gather all information required for planning, i.e., determining the status and importance of each process; establishing audit frequency.

#### 6.2.2 All business functions/departments are audited annually in accordance with the Black Cat IMS audit schedule. The internal audit schedule is flexible in its implementations and will adjust to changes or when major deficiencies have been identified during the planned audits. This period can be increased when the procedures have been found in order by several audits and the IMS QHSE Systems are functioning efficiently. The maximum interval between audits shall not exceed 12 Months.

#### 6.2.3 An annual Internal Audit Schedule shall be prepared by IMS Lead Auditor and approved by *HSEQ Manager* prior to performing audit activities. When deemed necessary by Quality HSE management, the approved Internal Audit Schedule shall be communicated to senior management including CEO, Department Managers, Project Managers etc...

#### 6.2.4 Each internal audit shall be conducted in accordance with the approved Internal Audit Schedule.

### 6.3 AUDIT PREPARATION

#### 6.3.1 As part of the audit preparation the IMS Lead Auditor shall do the following:

- Inform Audit team regarding upcoming audit schedule.
- Identify and list down the terms of references to be audited.
- Identification of auditee's participants or list of agreed auditees/interviewees in the audit.
- Select the Audit Team. Ensuring that Auditors are independent of the activity, they have been assigned to audit.



- Brief the Auditors, defining the requirements of each audit assignment and assisting in the preparation of audit checklists as needed.

6.3.2 Prior to the audit, the auditors must read the previous audit report, and check the status of any audit recommendations.

6.3.3 The Auditor reviews relevant documents and procedures to be audited and follows a selection of "transactions" through the procedure to ensure that the procedure has been followed.

6.3.4 Define audit objectives, scope and criteria.  
Audit Criteria – reference against which conformity is determined i.e., Standards (ISO), Contractual Specification, QMS, OH&S and EMS documentation, Programmes and Plans, Legislation and other requirements.

Audit Scope – extent and boundaries of the audit including locations, organizational units, activities and processes covered (including the time period).

Audit Objective – purpose of conducting the audit i.e., to obtain evidence of conformity, to review process, etc...

6.3.5 Prepare Audit Checklist  
Prior to conducting the audit, the Auditor/s shall prepare an Internal Audit Checklist. Formal or informal Internal Audit Checklists may be used to perform Internal Audits, *If required*.

6.3.6 Prepare and send to Auditee the Audit Notification Plan with Terms of References/Agenda, at least one week prior to an audit and/or as per client notification requirement. It shall serve as the confirmation of the audit activity.

#### 6.4 CONDUCTING THE INTERNAL AUDIT

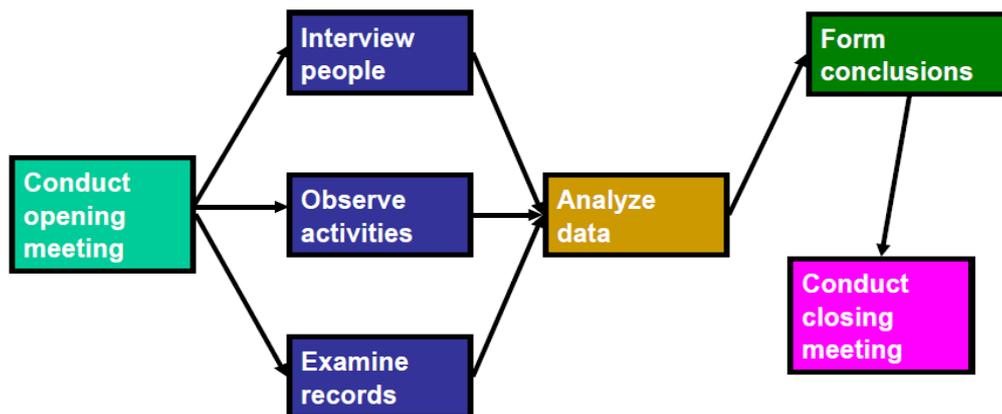


Figure 2 — Overview of the process of conducting the audit activities

6.4.1 Opening Meeting  
An opening meeting shall start the audit where the audit plan is reconfirmed with the auditee/s.

- Introduce all parties- Audit team and Auditees. Auditees/Interviewees-those responsible for the functions or processes to be audited. Establish communication links with activities being audited.



- Review and discuss the objective, scope and criteria of the audit and provide a short summary of the methods and procedures to be used to conduct the audit. Using the Audit Checklist (Refer to Attachment No. 3 – BCEC/IMS/002/F-003/REV.XX)
- Determine the general flow and assignments for data gathering (who will be with whom and when).
- Explain that verification of process and documents will be conducted randomly.
- Define and explain the classification of findings (NCR, Observations, Opportunity for Improvement) Refer to “Matrix for Classification of Audit Findings” See *Appendix 4*
- Explain about Confidentiality of audit result.
- Clarify the details of the audit plan and confirm the time and date for the closing meeting and any interim meetings.
- Include records of attendance.

#### 6.4.2 The Audit proper

Auditors shall carry out the internal audit function. The Audit proper shall include the following methods of collecting information:

- Knowledge of the IMS QHSE Management Systems, Company policies and procedures, product identification and traceability, document and data control and control of quality records are observed in all audited areas every audit. If not reviewed, the reason must be noted in the comments space on the Audit Report, general housekeeping, work environment, etc.
- The Auditors shall gather evidence through interviews, verification of documented information and quality records, and actual observation of activities and conditions in areas of concern.
- Review of documented information – procedures, plans,
- Examine and verify records. Recording of facts as evidence of the audit. All audit observations are documented, even if not originally covered on the checklist. Area management will be constantly informed of findings, there are to be no surprises at the closing meeting.
- Interview people and ask questions. Establishment of facts by interviewing the personnel, examining the documents, observing the processes and verifying records.
- Observe activities, practices and physical environment. Information gathered through interviews should be tested or investigated by acquiring the same information from other independent sources, such as physical observation, measurements and records.
- Witness actual demonstration. Auditor may ask assigned personnel to demonstrate actual operation of equipment.
- During the audit, the IMS Lead Auditor may make changes to the Auditors work assignments or the audit plan, if necessary, to achieve the audit objectives.



#### 6.4.3 Auditors' Review Meeting & Summary Report Writing

Audit evidence should be evaluated against the audit criteria in order to determine audit findings. The audit team should meet as needed to review the audit findings at appropriate stages during the audit.

- Auditors shall discuss all the findings with the IMS Lead Auditor. Evaluate the facts to determine objective evidence of nonconformity. Classify audit findings as to Non-conformity, or Observation or OFI.
- The IMS Lead Auditor shall have final decisions regarding the conduct of the audit and any Non-conformance, Observations or OFIs findings.
- A summary of audit findings shall be prepared by the Auditors to be reported or discussed to the Auditees.

#### 6.4.4 Closing Meeting

A closing meeting, facilitated by the IMS Lead Auditor, should be held to present the audit findings and conclusions to the auditees. Using Audit Report & Checklist (Refer to Attachment No. 3 – BCEC/IMS/002/F-003/REV.XX)

Participants in the closing meeting should include the management of the auditee and, where appropriate, those responsible for the functions or processes which have been audited and may also include the audit client and other relevant parties.

As appropriate, the following should be explained to the auditee in the closing meeting:

- a) advising that the audit evidence collected was based on a sample of the information available;
  - b) the method of reporting;
  - c) the process of handling of audit findings and possible consequences;
  - d) presentation of the audit findings and conclusions in such a manner that they are understood and acknowledged by the auditee's management;
  - e) any related post-audit activities (e.g. implementation of corrective actions, audit complaint handling, appeal process).
- Any diverging opinions regarding the audit findings or conclusions between the audit team and the auditee should be discussed and, if possible, resolved. If not resolved, this should be recorded.
  - Present audit findings to auditee management, taking into account their perceived significance.
  - Present the audit team's conclusions regarding the effectiveness of the quality system in the form of audit report and quality issue forms.
  - Include records of attendance.

#### 6.5 **FINAL AUDIT REPORT**

6.5.1 The IMS Lead Auditor shall consolidate all the audit reports prepared by each Auditor (Audit team) and prepare the final audit report.

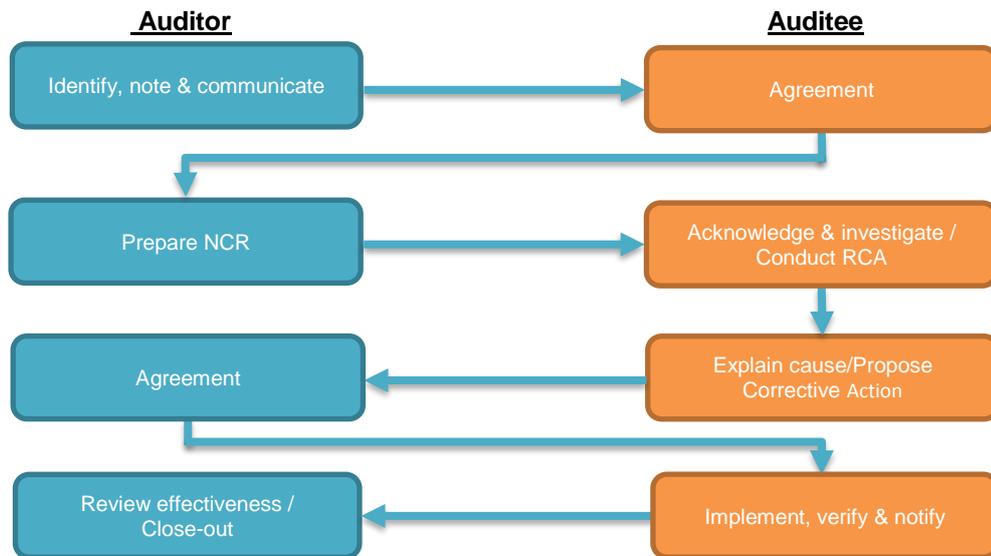
6.5.2 The audit report should be dated, reviewed and approved, as appropriate. The final Audit Report shall be forwarded to the QA Manager and HSEQ Manager for review and approval/signature, or incorporation of further information, if required.



- 6.5.3 A copy of Final Audit Report is sent electronically to the auditee at least within 7 days or as per Client requirement. The approved/signed audit report should then be distributed by the IMS Lead Auditor to the recipients – concerned Department Manager / Project Manager and copy to relevant management of the area.
- 6.5.4 Any non-conformances and/or observations must be complied and closed out within 30 days upon receipt of the Audit Report or as per Client requirements or approved Corrective Action/s.
- 6.5.5 The IMS Lead Auditor must ensure that completed audit reports and other relevant audit documents are retained.
- 6.6 **NON-CONFORMITY AND CORRECTIVE ACTION**
- 6.6.1 **Non-conformity** is a non-fulfilment of a requirement related to an intended or specified used where objective evidence exists showing that a requirement has not been addressed (intent), practice differs from the defined system (implementation) and the practice is not effective (effectiveness).
- 6.6.1.1 A finding of non-conformity shall be recorded against a specific requirement, and shall contain a clear statement of the non-conformity, identifying in detail the objective evidence on which the nonconformity is based. Nonconformities shall be discussed with the auditee to ensure that the evidence is accurate and that the nonconformities are understood.
- 6.6.1.2 When Non-conformity concerning QHSE management systems of the Company is reported or identified by an Internal Auditor through an Internal Audit, a “BCEC/IMS/002/F-005/REV.XX-Audit Non Conformity Report form (IMS Internal Audit) and/or BCEC/QS-11-Rev.XX Non Conformity Report (Project)” is issued for necessary corrective action by the Heads/Process Owners (Auditees).
- 6.6.1.3 When the NCR Form is received by the Head/Process Owner (Auditee), shall implement the following:
- Concerned Department/Head Process Holder should acknowledge the NCR Form by signing on the 1st page (space provided);
  - Perform a Root-Cause Analysis (RCA) using applicable approaches, tools, and techniques to uncover causes of incidents or problems (i.e., 5 WHYS; Incident investigation-References – 5 Why’s Template-BCEC/HSE/QS-064; BCEC Risk Assessment Matrix (RAM)-BCEC/HSE/QS-066;
  - Using the results of the RCA, formulate a correction and a corrective action;
  - The actions to be taken should address the identified cause/s of the NC;
  - Provide a specific implementation date for both the correction and corrective action;
  - Secure the approval of the Concerned Department/Head Process Holder;
  - Submit the completed NCR form to the Internal IMS Audit Team within 30 working days upon receipt or as per agreed date of completion.



6.6.1.4 Flow diagram – Identification to Closure of a Non-conformity



6.6.2 **Corrective action**

- 6.6.2.1 On receipt of the documented Audit Report and/or NCR Form, the concerned Department Manager / Project Manager must review the audit findings and the recommendations during department meetings.
- 6.6.2.2 The concerned Department Manager / Project Manager, in consultation with Senior staff, or other relevant employee, (in accordance with the Communication and Consultation Procedure) must identify proposed corrective action/s required when an Audit Report has identified non-conformances or observations.
- 6.6.2.3 Corrective action/s must be prioritized, identify the responsible person to action the correction or corrective action, have an agreed completion date based on the criticality.
- 6.6.2.4 The IMS Lead Auditor, in consultation with the Department Manager, must come to an agreement of proposed corrective action/s if it is acceptable or not and date of completion or implementation.  
  
**Note:** For internal audit Quality and HSE issues, the IMS Lead Auditor is authorized to accept or reject proposed corrective actions unless problem solving is required.
- 6.6.2.5 The IMS Lead Auditor is responsible for ensuring that the agreed completion date for implementing the corrective action has been met. Corrective action/s may require a subsequent audit or specific follow up to make sure the actions have been effective. The process or procedure is re-audited and the issue closed out when all corrective actions are completed. The IMS Lead Auditor should manage this process.
- 6.6.2.6 After implementing the corrective action and completing the close-out the "BCEC/IMS/002/F-005/REV.XX-Audit Non-Conformity Report, the same is sent to the HSEQ Manager for information, review and approval.



### 6.6.3 **Review of Corrective Action**

6.6.3.1 The IMS Lead Auditor shall monitor and update the NCR Register and Close-out Audit Report/List of Open Findings and provide a monthly report to the Top Management Team that includes the status of proposed corrective actions, number of days since finding was raised (response time) and person responsible (action by) for closing of same, any trends in audit findings and other relevant information.

6.6.3.2 At the end of the month, should there be outstanding “Open” findings (un-submitted within 30 working days or as agreed date) a follow-up communication shall be initiated by the IMS Lead Auditor to the concerned department/project for immediate submission. The IMS Lead Auditor shall organize a personal (face to face) meeting with the concerned department/project head

The IMS Lead Auditor shall be responsible in providing an update on why the item remained “open” and has not yet been closed out. The Non-Conformance Report (NCR) Register and Close-out Audit Report (Department/Project) shall be prepared and updated by IMS Lead Auditor and issued to Department Managers that have “Open” actions and copied to CEO and other relevant parties.

6.6.3.3 Where there is a delay to meeting the completion date this change, reason and extension shall be formally documented.

6.6.3.4 The reports of the Internal Audits (QHSE) with outstanding “Open” findings are discussed in the next Management Review Meeting.

6.6.3.5 Failure to accomplish and submit the NCR or completed Close-out Audit Report to the Internal Audit Team, despite agreement and follow-up meeting, shall be reported to the Top management for appropriate action. Any Audit findings outstanding which are beyond 60 Days period action review will be highlighted to Top management at MRM meeting to resolve all these audit findings.

6.6.3.6 The Top Management shall direct action when corrective actions have not been completed or fulfilled within timeframes allocated or when issues with implementation of actions occur.

### 6.7 **CLOSE-OUT AUDIT REPORT**

6.7.1 Close-out Audit Report form is considered to be a live document that need to be monitored and updated. This document is sends to Auditee along with the Audit Report where proposed “Corrective action”, “Action by” and “Completion date” for various non-conformities raised during the audit shall be provided by the Auditee and fill up in the form. Auditee shall resend to the Audit team this filled up form with required details provided one week upon receipt of the audit report and this close-out audit report. Audit team/IMS Lead Auditor shall maintain this record to monitor progress through action tracking register and completion of the close-out report.

6.7.2 When all the necessary corrections and proposed corrective actions have been taken and implemented, the Heads/Process Owners (Auditees) shall finalize the completed Close-Out Audit Report along with all its corrective evidences (to be attached in the closed-out report) and submit to QHSE Audit team for signatures- review/check and approval.

6.7.3 Signed copy of Closed-out Report to be sent back to the Heads/Process Owners (Auditees) for record keeping.



## 6.8 FOLLOW-UP AUDIT ACTIVITIES

- 6.8.1 Necessary follow-up activities are determined by the IMS Lead Auditor.
- 6.8.2 The IMS Lead Auditor shall follow-up on the audit schedule (at agreed date/time) and determine an appropriate length of time needed to review the corrective action and judge its effectiveness for close-out of the audit finding.
- 6.8.3 Follow-up activities may be assigned to audit team member or performed by the IMS Lead Auditor. Findings are noted on the original Quality or HSE Issue and, if satisfactory, the issue is approved by the IMS Lead Auditor and closed.

## 6.9 UNSCHEDULED AUDITS

- 6.9.1 Unscheduled audits may be conducted at any time based on any of (but not limited to) the following:
- (a) The findings of Audit/inspections, reports or outcomes of accident/incident investigations;
  - (b) Operational changes;
  - (c) External advice;
  - (d) Customer's request
  - (e) As a result of Top Management Team or CEO directives; or
  - (f) As a result of any other activity that may identify non-conformance.
- 6.9.2 Unscheduled audits should be recorded on the Internal Audit Schedule as soon as they are planned.

## 6.10 ON-THE-SPOT AUDITS (By Internal Auditors)

On-the-spot audit refers to on the spot valuation of existent process, product and services, from a process owner or in the system itself that have been captured and identified by the Internal Auditors driven by need either finding from other audits or incidents injuries or loss of some kind or driven by forced change legal or otherwise.

- 6.10.1 On-the-spot audits may be conducted by an Internal Auditors at any time and in any of the functional areas within the Company based on any of (but not limited to) the following:
- (a) when they spot potential problems;
  - (b) if any clear deviations from requirements are observed;
  - (c) process operating under uncontrolled conditions;
  - (d) evidence of failure to meet relevant requirements of the standard; or
  - (e) any unusual events/situations or noticeable practices or anything unexpected that was observed.
- 6.10.2 In any of the cases mentioned above that requires immediate correction and/or corrective action, the Internal Auditors must raise Non-conformity or Observation finding. That might eliminate the cause of a potential non-conformity, or incidents and near misses or improve the quality of services by providing recommendations for corrective actions and for continual improvement.
- 6.10.3 When non-conformity is detected or identified by an Internal Auditor through "On the Spot Audit", implement the following process:
- Any Audit Team Member shall document the non-conformity by including it in the Audit Report or by accomplishing the appropriate part of the Non-Conformity Report Form;



- Submit the Audit Report or NCR Form to the QA Manager and HSEQ Manager for review;
- The IMS Lead Auditor shall be responsible in forwarding the Audit Report or NCR Form to the concerned Department/Head Process Owner;
- The IMS Lead Auditor shall coordinate and monitor on the status of actions, and until the non-conformity is resolved;

## 7.0 MANAGEMENT OF CHANGE

7.1 As part of managing change, the Company shall address planned and unplanned changes to ensure that the unintended consequences of these changes do not have a negative effect on the intended outcomes of the QHSE management system.

7.2 For any changes affecting the organization and its processes, the Company shall plan conduct internal audit necessary for production or service provision, to the extent necessary to ensure continuing conformity with requirements

7.3 Changes include but not limited to the following:

- planned changes to products/services, processes, operations, equipment or facilities;
- organizational changes, changes in staff or external providers, including contractors/sub-contractors;
- new information related to environmental aspects, environmental impacts and related technologies;
- changes in compliance obligations, legislations, and standards.

## 8.0 REFERENCES

IMS QHSE Manual and Procedures

ISO Standards – ISO 9001; ISO 14001; OHSAS 18001 (ISO 45001); ISO 19011

## 9.0 DOCUMENTED INFORMATION

9.1 Audit Annual Plan (BCEC/IMS/002/F-001)

9.2 Audit Notification & Program (BCEC/IMS/002/F-002)

9.3 Audit Report & Checklist (BCEC/IMS/002/F-003)

9.4 Audit Close-out Report (BCEC/IMS/002/F-004)

9.5 Audit Non-Conformity Report (BCEC/IMS/002/F-005)

9.6 Audit Findings Register (BCEC/IMS/002/F-006)

9.7 Audit Attendance Register (BCEC/IMS/002/F-008)

## 10.0 RECORDS

All documentation, reports, records and other relevant documents generated by the internal audit process are retained and managed in accordance with the Control of Documented Information procedure.

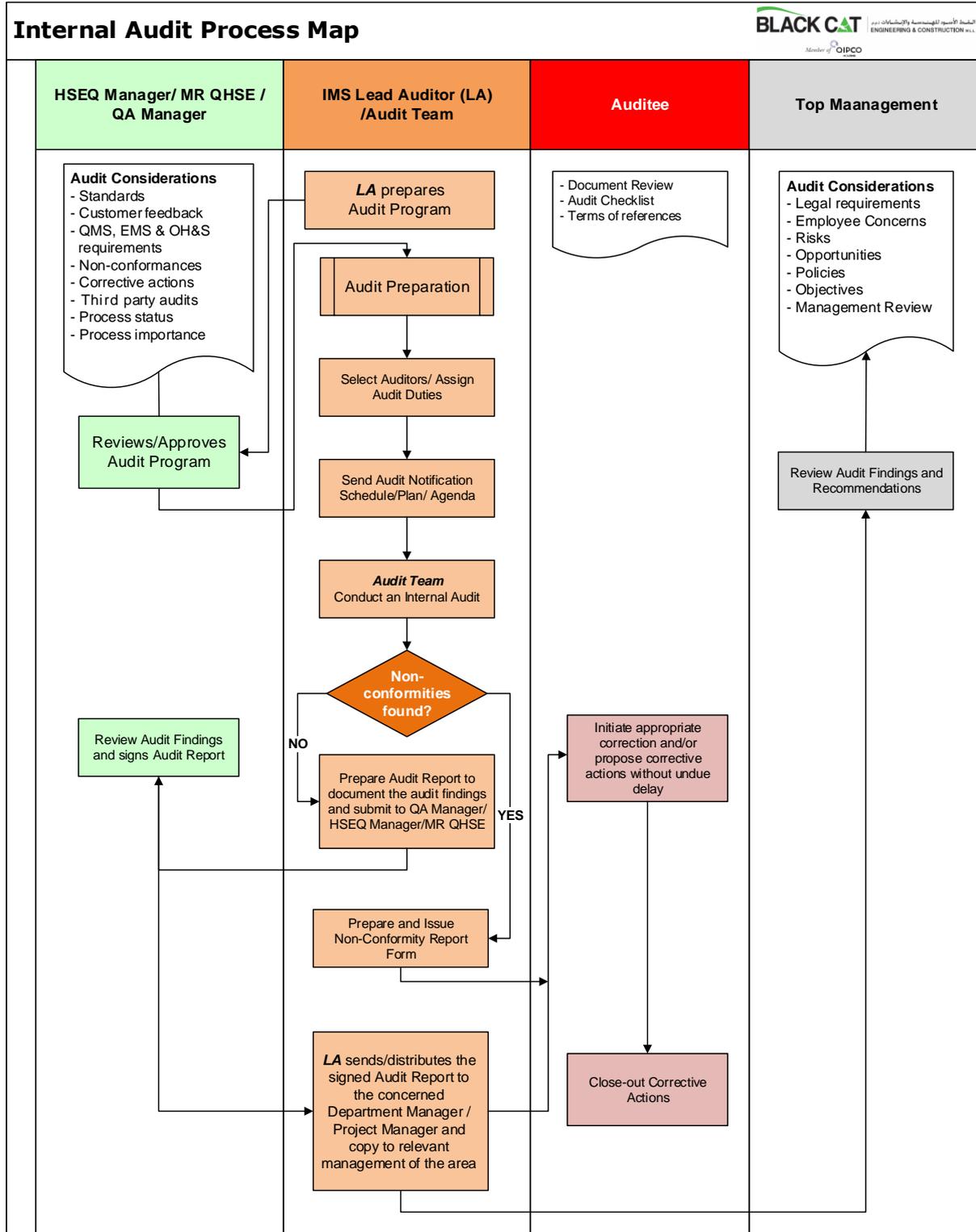


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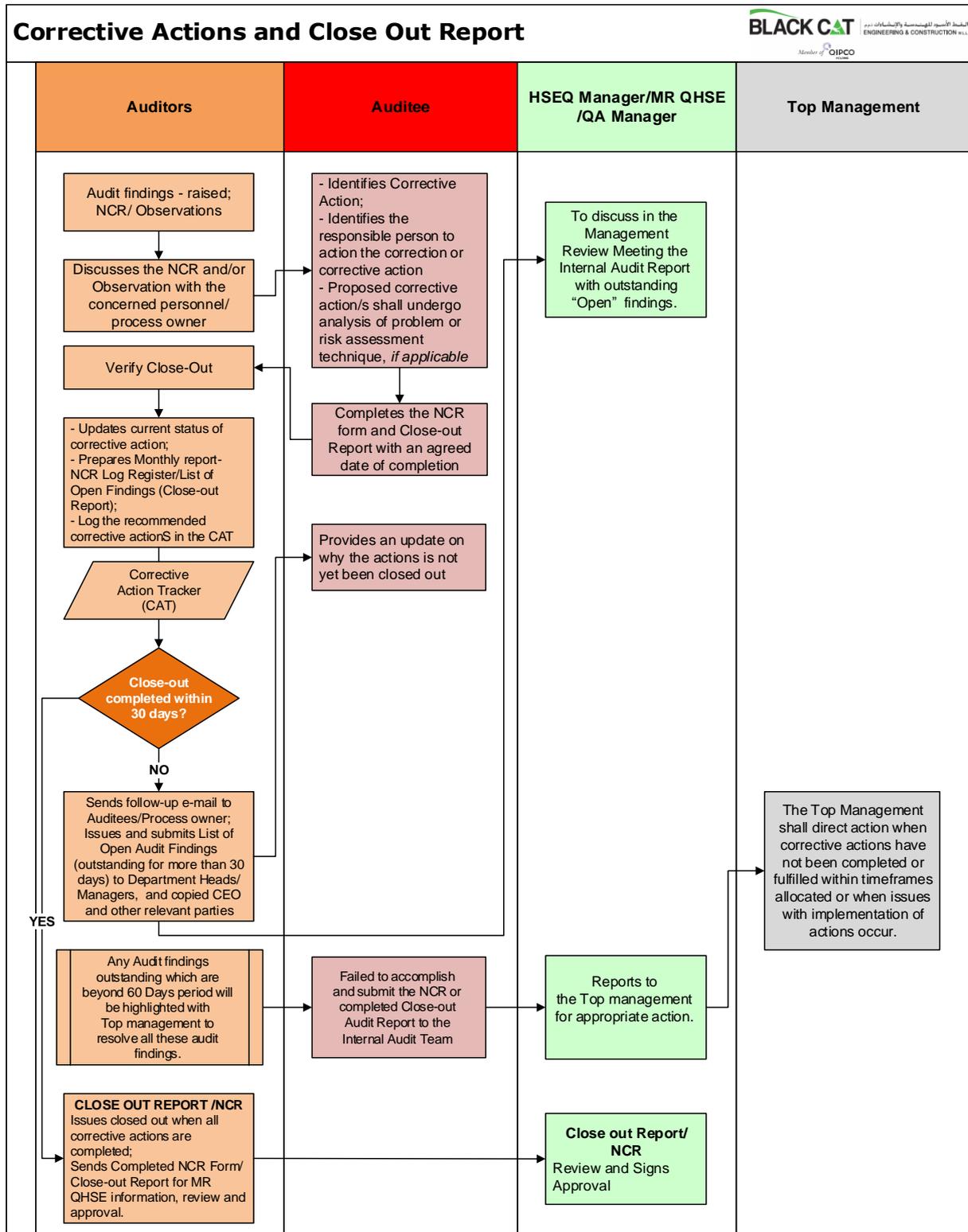
## APPENDICES



**Appendix 1 – Internal Audit Process Flowchart**



**Appendix 2 – Corrective Actions and Close Out Report Flowchart**



### Appendix 3 – Auditors’ Skill Matrix (Qualification Requirements)

Auditor	Education	Auditor Training	Total Work Experience	Total Audit Experience	Additional Requirements
QMS	Graduate in any discipline	IRCA certified Lead Auditor (LA) Training (40 hrs.)	5 years (at least 2 years of the total five years in Quality field)		<ul style="list-style-type: none"> <li>-Fluent in English (both oral &amp; written)</li> <li>-Must have analytical ability</li> <li>-Familiar with most relevant international standards</li> </ul>
OH&S	Graduate in any discipline	Internal Audit Training (24 hrs.)	5 years (at least 2 years of the total five years in OH&S field)	Under guidance of a competent audit team leader	<ul style="list-style-type: none"> <li>-Fluent in English (both oral &amp; written)</li> <li>-Must have knowledge on Occupational, Health &amp; Safety management system</li> <li>-Familiar with most relevant international standards related to Health &amp; Safety</li> </ul>
EMS	Graduate in any discipline	Internal Audit Training (24 hrs.)	5 years (at least 2 years of the total five years in EMS field)	Under guidance of a competent audit team leader	<ul style="list-style-type: none"> <li>-Fluent in English (both oral &amp; written)</li> <li>-Must have knowledge on Environmental management system</li> <li>-Familiar with most relevant international standards related to Environment</li> </ul>
IMS	Graduate in any discipline	IRCA certified Lead Auditor training (40 hrs.) in QMS, OH&S and EMS	5 years (at least 2 years of the total five years in the field of Quality, OH&S & EMS)		<ul style="list-style-type: none"> <li>-Fluent in English (both oral &amp; written)</li> <li>-Must have analytical ability</li> <li>-Familiar with most relevant international standards related to Quality, Health, Safety &amp; Environment</li> </ul>



#### Appendix 4 – Classification of Audit Findings Matrix

TYPES OF AUDIT FINDINGS	DESCRIPTION OF AUDIT FINDINGS	AUDIT FINDINGS DISTINCTION
<p><b>Non-conformance:</b></p>	<ul style="list-style-type: none"> <li>▪ Breakdown, or partial breakdown of a process in the Integrated Management System (IMS) An audit non-conformance typically requires:               <ul style="list-style-type: none"> <li>- Root cause analysis</li> <li>- Root cause</li> <li>- Elimination</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Requires Root Cause</li> </ul>
<p><b>Classification of Non-conformance:</b></p> <p><b>Major Non-Conformance</b></p>	<ul style="list-style-type: none"> <li>▪ Based on objective evidence, the absence of, or a significant failure to implement and/or maintain conformance to the requirements of the applicable standard. (i.e. the absence of or failure to implement a complete Management System clause of the standard);</li> <li>▪ A situation which would on the basis of available objective evidence, raise significant doubt as to the capability of the Management System to achieve the stated policy and objectives of the customer.</li> </ul>	<ul style="list-style-type: none"> <li>▪ If finding requires the analysis and/or elimination of a root cause.</li> </ul>
<p><b>Minor Non-Conformance:</b></p>	<ul style="list-style-type: none"> <li>▪ Represents either a management system weakness or minor issue that could lead to a major nonconformance if not addressed.</li> <li>▪ Each minor NC should be considered for potential improvement and to further investigate any system weaknesses for possible inclusion in the corrective action program.</li> </ul>	<ul style="list-style-type: none"> <li>▪ If it requires a change to the current process.</li> </ul>



TYPES OF AUDIT FINDINGS	DESCRIPTION OF AUDIT FINDINGS	AUDIT FINDINGS DISTINCTION
<b>Observation</b>	<ul style="list-style-type: none"> <li>▪ Minor deviation from an otherwise well- implemented process.</li> <li>▪ Minor oversight on the part of the auditee.</li> <li>▪ Observations are recorded on an Audit Action List. Observation may be treated as non- conformance when multiple similar nature of observations was detected on Audit Action Item List.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Root cause analysis is not required for observations.</li> </ul>
<b>Opportunity for Improvement (OFI)</b>	<ul style="list-style-type: none"> <li>▪ OFI is a finding based on facts and data that shows a potential improvement opportunity.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Action is not required for OFI, but more supporting data should be included to encourage action by auditor.</li> </ul>



Procedure No.: BCEC/IMS/002  
Effective: 27.02.2019  
Issue Date: 20.02.2019  
Revision No.: 9

## ATTACHMENTS





**Attachment No. 2**



**Audit Notification & Program**

AUDIT NOTIFICATION			
Attention To:		Date of Audit	
Project No. or Department			
Type of Audit	<input type="checkbox"/> Internal (Department/Project) <input type="checkbox"/> External/ 2nd Party (Vendor/ Sub-Contractor/Third Party)		
Audit Notification No.	BCEC/AUD/ / / IN		Audit Date Start
Notification Date	As per contract reqt or atleast 7 days		Audit Date End
Project No./Title			Auditee
Audit Standard Reference			
Audit Quality Objectives			
Audit Scope Description			
Client Representative			
Contractor Representative			
Lead Auditor: (LA)			
Auditors (A)			

AUDIT PROGRAM			
DATE	TIME (approximate)	AUDITOR	PROCESSES

Approved By:

\_\_\_\_\_

HSEQ Manager

Auditee Confirmation (Please return this notification with Signature):

\_\_\_\_\_

Auditee Representative:

Date:

Note: The audit program described here is meant to be flexible. It may be subject to changes by auditee (e.g. time may be adjusted to availability of person being audited) or by the Lead Auditor/Auditor in consultation with Auditee's QMR/Top Management during the office Opening Meeting and/or at anytime as situation warrants it.

Page 1 of 1

BCEC/IMS/002/F-002/REV.0/ 03.02.2019

**Attachment No. 3-A (9 pages) Page 1 of 9 – Sample Template**

AUDIT REPORT & CHECKLIST				
<input type="checkbox"/> Pre Audit Report		<input type="checkbox"/> Final Audit Report		
Type of Audit	<input type="checkbox"/> Internal (Department/Project)		<input type="checkbox"/> External/ 2nd Party (Vendor/ Sub-Contractor/TPIA)	
Audit No.			Report Date:	
Auditee			Audit Date	
Auditee Information		Client's Information		
Project Ref:			Project Ref:	
Location:			Location:	
Contact Details:			Contact Details:	
Auditee Participants/ Representative				
Name:	Position:		Email:	
Name:	Position:		Email:	
Name:	Position:		Email:	
Name:	Position:		Email:	
Name:	Position:		Email:	
Name:	Position:		Email:	
Auditors				
Name:	Position:		Email:	
Name:	Position:		Email:	
Name:	Position:		Email:	
Name:	Position:		Email:	
Name:	Position:		Email:	
Name:	Position:		Email:	
Audit Ratings		<b>100%</b>		
Overall Summary & Recommendations (S&R)				
Scope:				
Strength:				
No. of NCR:	No. of Observation:		No. of OFI:	
S&R:				
Attachments:				
Note:				
	Prepared by:	Reviewed by:	Approved by:	
Signature:				
Name:				
Designation:	Lead Auditor/ Auditor	QA/QC Manager	HSEQ Manager	
Date:				
<p><small>Note: Pre-Audit Report and checklist is given to Auditee for Audit Notification and Program Reference and actual audit preparation. Pre-audit report is filled-up only during audit process as draft to safeguard audit findings as captured by Auditor during audit. Pre-audit report shall be signed and agreed by Auditor and Auditee after closing audit. The checklist is subject to change for quality improvements and further improve as per Client/Customer requirements upon Top Management/ Lead Auditor approval. Distribution/duplication is subject to management approval.</small></p>				
1 of 8		BCEC/IMS/002/F-003/REV.D/ 03.02.2019		

Attachment No. 3-B (9 pages) Page 2 of 9 – Sample Template



القسط الأسود للهندسة والبنشاءات دم.م  
 ENGINEERING & CONSTRUCTION W.L.L  
 Member of QIPCO

AUDIT REPORT & CHECKLIST						
<input type="checkbox"/> Pre Audit Report			<input type="checkbox"/> Final Audit Report			
Type of Audit	<input type="checkbox"/> Internal (Department/Project)		<input type="checkbox"/> External/ 2nd Party (Vendor/ Sub-Contractor/TPIA)			
Audit No.			Report Date:			
Auditee			Audit Date			
<b>Audit Compliance Ratings:</b> Rating (%) = $\frac{\text{No. of Compliance} \times 100}{\text{Total Applicable IMS Clauses}}$ Minimum Management Requirement = 75%			<b>Criteria Definition &amp; Counts:</b> YES = No. of Compliance [1]      Improvement = No. item for Improvement [-0.5] No = no. of Non Compliance [1]      N/A = Not applicable [0]			
Discipline Ref	<input type="checkbox"/> QMS <input type="checkbox"/> HSE		Findings to tick below (Y) or Note Description of Findings			
QMS/IMS/OHS Clause	Standard Question Reference	Check	Yes	No	Improvement	N/A
4	Context of Organization					
4.1	Understanding the Organization and its Context					
	a) Has the organization identify, documented and analyze internal and external issues that can affect customer satisfaction and delivery of quality products and/or services?					
	b) Who is responsible for the identification, documentation and communication of external / internal issues ?					
4.2	Needs & Expectations of Interested Parties					
	a) Interested parties has been identified and documented which is relevant to QMS/IMS?					
	b) Interested parties relevant requirement/needs/expectation has been identified and documented?					
	c) Who is assigned/responsible to identify and analyze the needs and expectation of interested parties?					
4.3	Scope of the Quality Management System					
	a) Has the organization establish the scope and applicable boundaries of QMS/IMS and documented it? Evolution?					
	b) External and internal issues has been considered?					
4.4	Quality Management System/ IMS					
	a) Does organization establish a QMS/IMS process to implement, maintain and continually improved QMS/IMS processes? Documented?					
5	LEADERSHIP (Clause 5.1, 5.2 and 5.3)					
5.1	Leadership and Commitment					
5.1.1	General					
	a) Top management demonstrate commitment and accountability to the effectiveness of QMS/IMS?					
	b) Does top management ensures that policy and objectives are establish and compatible?					
	c) Can the integration of quality management system be demonstrated by top management into organization business process?					
	d) Is risk based thinking promoted and demonstrated by top management/leaders?					
	e) Are resources needed to implement QMS/IMS is available?					
	f) Does top management communicates to the different levels of the organization to impart the importance of effective QMS/IMS and its requirements?					
5.1.2	Customer Focus					
	a) Top management to demonstrate that customer requirement are determined and consistent?					
5.2	Policy					
5.2.1	Establishing the Quality Policy					
	a) Does the quality policy statement appropriate to scope and context of the organization? Framework for objectives? Time? Commitment to applicable market and legal requirements and continuous improvement?					

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BCEC/IMS/002/F-003/REV.0/ 03.02.2019

**Attachment No. 3-C (9 pages) Page 9 of 9 – Sample Template**



AUDIT REPORT & CHECKLIST						
<input type="checkbox"/> Pre Audit Report			<input type="checkbox"/> Final Audit Report			
Type of Audit	<input type="checkbox"/> Internal (Department/Project)		<input type="checkbox"/> External/ 2nd Party (Vendor/ Sub-Contractor/TPIA)			
Audit No.			Report Date:			
Auditee			Audit Date			
	Let of opportunity for improvement identified for correction, improvement and preventing for possible reduction.					
10.2	Nonconformity and corrective action					
a	Process/procedures established as guideline to capture complaint, conduct investigation of root causes of nonconformities and to define appropriate corrective action to prevent re-occurrence?					
b	Does the organization/department maintain a list of complaints (internal/external)? Is there evidence that these complaints are examined to identify root causes and opportunity to implement corrective actions?					
c	Process/form to document the decision making process to pursue investigation and root cause corrective action?					
d	Document of risks and opportunities been updated based on non-conformities found?					
10.3	Continual Improvement					
	Does the organization consider results of IPI and evaluate them to determine necessity of improvement?					

**Evidence:**

Photo 1

Photo 2

Photo 3

Photo 4

Auditor:

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Auditee:

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Note: Pre-Audit Report and checklist is given to Auditee for Audit Notification and Program Reference and actual audit preparation. Pre-audit report is filled-up only during audit process as draft to safeguard audit findings as captured by Auditor during audit. Pre-audit report shall be signed and agreed by Auditor and Auditee after closing audit. The checklist is subject to change for quality improvement and further improve as per Client/Customer requirements upon Top Management/Lead Auditor approval. Distribution/Replication is subject to management approval.

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BCEC/IMS/002/F-003/REV.0/ 03.02.2019

Procedure No.: BCEC/IMS/002  
 Effective: 27.02.2019  
 Issue Date: 20.02.2019  
 Revision No.: 9

**Attachment No. 4**

CLOSE-OUT AUDIT REPORT								
Type of Audit		<input type="checkbox"/> Internal (Department/Project) <input type="checkbox"/> External/ 2nd Party (Vendor/ Sub-Contractor/Third Party)						
Audit No.					Report Date:			
Auditee					Audit Date			
Overall Summary of Audit Report:	Non-Conformance Report (NCR):							
	Observations (O):							
	Opportunities for Improvement/Recommendation (OFI/R):							
Standard Reference/Requirement	Description	NCR		OBSERVATION	Action By	Comments on the Corrective Action taken/ Observation	Completion Date	Status
QMS/EMS/OHS Clause	Audit Findings: NCR/Observation	Root Cause Analysis	Corrective Action (Compliance from Auditee)	Reply				
Note:								
Prepared By:		Reviewed By:			Approved By			
Signature: _____		Signature: _____			Signature: _____			
Name: _____		Name: _____			Name: _____			
Designation: _____		Desig: _____			Designation: _____			
Date: _____		Date: _____			Date: _____			
Page 1 of 1				BCEC/IMS/002/F-004/REV.0/ 03.02.2019				

INTERNAL AUDIT  
 Prepared by HSEQ Department  
 Approved by Chief Executive Officer

*UNCONTROLLED IF PRINTED. This copy was valid at the time it was printed.*

**Attachment No. 5**

 <p>القسط الأسود للهندسة والإنشاءات د.م.م          ENGINEERING &amp; CONSTRUCTION W.L.L.          Member of OIPCO HOLDING</p>		<p>No. of NCR</p> <p>Date Issued</p> <p>Department</p>
<p><b>AUDIT NON-CONFORMITY REPORT</b></p>		<p>NCR NO.: BCEC/AUD/NCR/ / / / /</p> <p>DATE: / /</p>
<p><b>TO BE FILLED UP BY AUDITOR/OBSERVER</b></p>		
<p>Process:</p>		<p>Process Owner/Department:</p>
<p>NCR IDENTIFICATION: <input type="checkbox"/> Process <input type="checkbox"/> Services <input type="checkbox"/> Customer Complaint  <input type="checkbox"/> Product <input type="checkbox"/> Requirement</p>		
<p>NON-CONFORMITY DESCRIPTION:</p>		
<p>REQUIREMENT DESCRIPTION:</p>		
<p>ISSUED BY: SIGN</p>		<p>DATE:</p>
<p>POSITION:</p>		
<p><b>TO BE FILLED UP BY AUDITEE:</b></p>		
<p>ROOT CAUSE ANALYSIS:</p>		
<p>PROPOSED CORRECTION:</p>		
<p>PROPOSED CORRECTIVE ACTION:</p>		
<p>NAME AND SIGNATURE:</p>		<p>TARGET DATE:</p>
<p>POSITION:</p>		
<p><b>FOLLOW UP AND CLOSE-OUT (AUDITOR):</b></p>		
<p>PROPOSED CORRECTIVE ACTION COMMENTS:</p>		
<p>NAME AND SIGNATURE:</p>		<p>DATE:</p>
<p>POSITION:</p>		
<p>CORRECTIVE ACTION VERIFICATION:</p>		
<p>NAME AND SIGNATURE:</p>		<p>DATE:</p>
<p>POSITION:</p>		
<p>CLOSE OUT (COMMENTS):</p>		
<p>Auditor:</p> <p>Name:</p> <p>Signature:</p> <p>Date:</p>	<p>Manager:</p> <p>Name:</p> <p>Signature:</p> <p>Date:</p>	<p>HSEQ Manager Approval:</p> <p>Name:</p> <p>Signature:</p> <p>Date:</p>

BCEC/IMS/002/F-005/REV.0/03.02.2019



**Attachment No. 7**

**AUDIT ATTENDANCE REGISTER**

<b>Department/ Project/ Company</b>		<b>Audit standard</b>	<b>ISO 9001:2015; ISO 14001:2015; OHSAS 18001:2007</b>		
<b>Date Opening</b>		<b>Time Opening</b>	<b>Audit type (Tick "√" as applicable)</b>	<b>Internal (Department)</b>	
<b>Date Closing</b>		<b>Time Closing</b>		<b>Internal (Project)</b>	
				<b>Sub-Contractor</b>	
				<b>Vendor/ Third Party</b>	

No.	Name	Designation	Signature	
			Opening Meeting	Closing Meeting
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				

AUDIT TEAM				
No.	Name	Designation	Signature	
			Opening Meeting	Closing Meeting
1.				
2.				
3.				

BCEC/IMS/002/F-008/REV.0/13.08.2018



# CHAPTER 3

## HUMAN RESOURCES

# EMPLOYEE AND BUSINESS CODE OF CONDUCT



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## EMPLOYEE AND BUSINESS CODE OF CONDUCT

Responsible conduct by employees is essential for the proper performance of Company business. The Company expects certain behaviors from its employees regarding job attitude and performance. Policies and procedures are designed for the employee to follow acceptable norms of conduct and avoid undesirable actions and behavior so that the Company can achieve its goals and objectives smoothly.

The Company wishes to implement sound employee relations policies and procedures that are in line with the principal objective of maintaining essential discipline and of correcting and improve employees' work performance, behavior and conduct, and for the efficiency of the Company's operations.

BCEC's image and reputation is part of the Company's operation and performance. As such, Company's prestige and standing in the local communities must be maintained at the highest standards.

The Company will conduct its business with honesty, integrity and respect for the interests of its clients, employees, sponsors and partners.

The Heads of Departments are responsible for ensuring that their employees are following the Company's code of conduct requirements, and report to the Human Resources Manager any event of repetitive non-adherence to it.

### Key Processes

The following are the key processes identified in this chapter:

1. Article 1 – Employee Code of Conduct
2. Article 2 – Business Code of Conduct
3. Article 3 – Employee and Business Code of Conduct Guidelines Declaration

### Article 1

#### 1.0 EMPLOYEE CODE OF CONDUCT

#### POLICY

#### 1.1 PROPER CONDUCT RELATIVE TO THE COMPANY'S REPUTATION

##### 1.1.1 CONFLICTS OF INTERESTS

1.1.1.1 The Company expects its employees to avoid any personal activities and financial interest which may conflict with their commitment to effectively perform their jobs. Employees may not undertake any business or employment with out the prior written permission of BCEC. Exception may generally be made for non-profit work and honorary positions related to charities, etc. Employees must not conduct business operations that compete with those of BCEC or engage in other business operations whose scope is such that it infringes the performance of the employee's ordinary duties.

1.1.1.2 Employees should not participate in any activity which creates or appears to create a conflict between his personal interest and the Company's business interest, such as working for the competitors or the customers/clients, contractors, sub-contractors or suppliers of the company or dealing with the company for their own behalf and for personal gain.

- 1.1.1.3 Employees should not use the Company's property, assets or information system for any purpose other than that of the Company's business.
- 1.1.1.4 Employees are expected to be loyal to BCEC at all times while in the employment. They will therefore not engage in any outside employment without prior consent of their Department Manager and pre-approval of the Executive General Manager.
- 1.1.1.5 Where an activity or assignment may be in conflict with BCEC's interests, the employee will refrain from such activities.
- 1.1.1.6 Where employees are unclear about possible conflicts, they should approach their Department or Project Managers for clarification.
- 1.1.1.7 All employees are expected to be courteous and civil when dealing with clients and the public at large.
- 1.1.2 TREATMENT OF THE COMPANY'S INFORMATION / CONFIDENTIALITY**
- 1.1.2.1 Any communication received from a client or member of the public must be dealt with expeditiously and courteously by the designated employee.
- 1.1.2.2 Employees should hold any secret information of the Company, customer information and personal information as strictly confidential and should not divulge such information to any third party, nor should they use the same for any purpose other than that of the business of the Company.
- 1.1.2.3 Employees must not disclose any information concerning BCEC or its employees, or release any official documents to unauthorized persons, unless he is required to do so in the course of duty and such disclosure must be authorized by the Executive General Manager.
- 1.1.2.4 Employees should treat any secret information divulged by a third party as in the same manner as they treat the secret information of the Company.
- 1.1.2.5 Employees should not illegally acquire or use any secret business information of a third party.
- 1.1.2.6 Employees shall maintain the utmost confidentiality with regard to BCEC, its clients, contracts, subcontracts and tendering information. This principle continues to be applied post termination. On termination of their employment with BCEC employees must return all files, telephones, laptops, documents, other papers and property of every description within their possession or control belonging to BCEC.
- 1.1.3 GIFTS, FAVORS AND OTHER BENEFITS**
- 1.1.3.1 BCEC strongly discourages employees and their immediate families from accepting or soliciting gifts, payments, commissions, loans, services, entertainment (apart from normal occasional social business meals/drinks) from representatives of and/or organizations or from any other parties related to their duties and seeking to conduct business with BCEC.
- 1.1.3.2 Employees in general should not solicit gifts nor accept cash from suppliers and recruitment agents who supply or provide or may wish to provide goods or services to BCEC in the normal course of business.



- 1.1.3.3 The acceptance of gifts in kind must be restricted to those that are offered by Companies as part of their normal marketing activities, but only on the condition that there is no possibility of that acceptance being misconstrued and should not exceed the value of QAR 400 per occurrence. Hospitality in the form of lunches, dinners and social events is permitted provided that it falls within the usual and reasonable amounts.
- 1.1.3.4 Token gifts and promotional material, which fall outside this policy may be accepted provided that these do not place the employee under any commercial or moral obligation; No misconstructions, however ill founded, could be put upon the acceptance.
- 1.1.3.5 Where a gift cannot be refused to avoid causing an offense, the item must be declared to the Company.
- 1.1.3.6 In all cases, the employee must notify his Direct Supervisor that a gift or hospitality has been made and/or when deemed necessary, the item(s) shall be passed to the Head of Department to take further action.
- 1.1.3.7 Any person/s accepting a gift contrary to these rules will be liable to disciplinary action, which may result in summary dismissal. If there is any element of doubt about any offer regarding the acceptance of gifts, gratuities or hospitality, guidance should be sought in advance from the Human Resources Manager or Head of Department concerned.
- 1.1.4 ANITI-CORRUPTION – BRIBERY**
- 1.1.4.1 Employees are prohibited from soliciting and/or accepting or offering bribes to gain business or financial advantages.
- 1.1.4.2 Employees should not render public officials or persons in a similar position any economic favor such as money, gift or other favor in return for performance of their duties.
- 1.1.4.3 Employees should not pay any agent, advisor or consultant any commission which they have reason to know will be used for influencing public officials or persons in a similar position in an unlawful manner.
- 1.1.4.4 Employees should not render employees or officers of customers/clients of the Company any economic favor such as money, gift or other favor, the value of which is greater than a generally accepted commercial level at the relevant locale nor should they receive such economic favor from officers of customers/clients of the Company.
- 1.1.4.5 Employees who are subjected to demands of this nature must report it immediately to Management.
- 1.1.5 DONATIONS AND OTHER CONTRIBUTIONS**
- 1.1.5.1 Employees should comply with applicable laws and regulations in the event that they make donations and other contributions to various entities.
- 1.1.6 SOCIAL CONTRIBUTION**
- 1.1.6.1 As good corporate citizens, employees should make every effort to establish relationships of trust with the all stakeholders of the Company with whom they have dealings for the continued improvement of corporate value, while carrying out their duties for the Company and further should try, where possible, to make a positive contribution to the communities in which they perform such duties to work toward building a sustainable society.

1.1.7.2 Employees responsibilities should extend beyond economic contributions, and employees need to be generally active on a consolidated base in different fields, with emphasis on education (cultivation of human resources) and the environment.

### **1.1.7 PROTECTION OF ENVIRONMENT**

1.1.7.1 Employees should comply with all the laws and regulations concerning the protection of the environment and actively engage in educational activities related to environmental protection and the efficient use of resources and energy.

1.1.7.2 Employees should expand the procedures for evaluating the environmental impact of any new business and strike a balance between business activities and environmental protection.

1.1.7.3 Employees shall contribute to the development and spread of environmentally friendly technology or business improvements and always take into consideration issues of safety.

### **1.1.8 COMPLIANCE WITH THE GOVERNMENT LAW AND RESPECT FOR HUMAN RIGHTS**

1.1.8.1 Employees should comply with all applicable laws and regulations of the State of Qatar and should conduct themselves in an ethical and responsible manner in the communities in which they perform their duties for the Company

1.1.8.2 Employees should also avoid any action that may be seen to be undesirable, or bring BCEC or its name into disrepute.

## **1.2 PROPER CONDUCT RELATIVE TO COMPANY OFFICERS/EMPLOYEES**

### **1.2.1 RESPECT / DISRESPECT FOR OFFICERS/CO-EMPLOYEES/HUMAN RIGHTS**

1.2.1.1 All employees shall give proper respect to and follow and comply with the instructions of their superiors and officers of the Company.

1.2.1.2 All employees shall be polite and courteous to their co-employees and shall assist and cooperate with one another in the performance of their duties or in the implementation of the aims, purposes or objectives of the Company.

1.2.1.3 Employees should respect the cultures, customs and history of the country (State of Qatar) to which they are brought into contact to work and while performing their duties for the Company.

1.2.1.4 Employees should respect human rights and should not discriminate between persons based on reasons of race, creed, sex, social status, religion, nationality, age or disability.

1.2.1.5 Every employee is expected to use his prudence in giving explanation/clarification in case co-employee makes a complaint or a point of comment; any problem in dispute relating to disrespectful behavior should be referred to the Company's grievance policy and procedure for attention and appropriate action.

1.2.1.6 No employee has the right to deceptively spread rumors about other employee. The Company does not tolerate any ill-mannered misbehavior or personal attacks to anybody at whatever seniority level. At the same time the Company also does not tolerate any employee gossiping and scandalously chitchatting about others. This is severely disrespectful and very unprofessional.

### **1.3 PROPER CONDUCT RELATIVE TO COMPANY'S PROPERTIES AND RESOURCES**

- 1.3.1 Personal business on Company time is forbidden.
- 1.3.2 Thrift should be observed in the use of stationery and other office supplies of the Company; each employee is expected to be cost-conscious and to be aware of his responsibilities to help the Company cut unnecessary expenditures.
- 1.3.3 Employees are expected to protect the interests of BCEC at all times and should not cause damage to the property or reputation of BCEC.
- 1.3.4 The employee shall maintain the resources under his authority such as raw material, means of production or products and other items and make necessary arrangements to safeguard them.
- 1.3.5 Personal use of Company property is not permitted without specific permission.
- 1.3.6 Employees should not use equipment, machinery and tools provided by the employer outside the place of work, without prior authorization from the Company. Such equipment, machinery and tools will be stored safely by the employees.
- 1.3.7 Where damage is caused by carelessness, negligence, or malicious acts, the employee will be held liable and will meet the costs of the damage made.
- 1.3.8 Employees should return material, equipment, tools, unused material to the Company upon termination or end of the employment contract.

### **1.3.9 COMPANY FUND AND FINANCIAL REPORTING**

- 1.3.9.1 Employees should properly manage the assets and funds of the Company and use them only for appropriate business related purposes. Employees shall not establish or maintain undisclosed or unrecorded assets or funds.
- 1.3.9.2 Employees should make timely and appropriate accounting reports, ensuring the accuracy of the reports, and should not make any false or misleading entries in the Company's books and records.

### **1.4 GENERAL ADMINISTRATIVE PROCEDURES**

- 1.4.1 If an employee finds evidence of violations of these policies, he should inform the HR Department or Employee Review Committee (ERC) or Human Resources Manager or any other of his superiors, following the grievance policy and procedure of the Company (please refer to Chapter 10-Employee Grievances).
- 1.4.2 Employees should cooperate in any investigation of such alleged violation. If, as a result of the investigation, it becomes clear that there was a clear violation of these policies, sanctions and/or proper disciplinary actions will be imposed on the violator or his superiors (applying the principle of command responsibility) in accordance with the regulations of the Company.
- 1.4.3 The Company ensures that no disciplinary action will be taken against an employee for reporting or informing of such violation or cooperating in such investigation and makes every effort to prevent such informant and any employees cooperating in such investigation from suffering any disadvantage at his office.

### **ON ACCEPTANCE OF GIFT**

- 1.4.4 As mentioned in the policy of this Chapter, where a gift cannot be refused, any employee accepting or receiving any gifts from any other parties must be declared to the company and must comply with the following procedures:

#### Employee:

- 1.4.5 Employee who received a gift(s) or an item(s) from other party shall declare immediately or notify and hand over same to his Direct Supervisor and/or Department Head for further actions.

#### Direct Supervisor/Head of the Department

- 1.4.6 Monitors gifts received by his staff (subordinates) from other party.
- 1.4.7 Upon receipt of notification and item(s) from the concerned employee, will record in their internal monitoring list of item(s)/gift(s) received from other party and its estimated value and handed over directly to the Human Resources Manager.

- 1.4.8 To accomplish and fill out the “Declaration Form” (On Acceptance of Gifts). To declare details of items received as well indicate his comments and suggestions.

#### Human Resource Manager (HRM)

- 1.4.9 Receives the item(s) and Declaration Form submitted by the Direct Supervisor and/or Department Head.
- 1.4.10 Reviews the report, as his sole discretion and judgment, he has the right to decide on what should be done with the item(s) received, if it need to be acknowledged/accepted or to be returned.

### **YEAR-END DECLARATION OF ACCEPTANCE AND NON-ACCEPTANCE OF GIFT**

- 1.4.11 The HR Department will send out to all employees towards the year-end (by third week of December) a copy of Declaration Letter for Acceptance and Non-Acceptance of Gift within year. All employees will be asked to disclose and certify any items received by indicating list of gifts/other benefits accepted and/or non-acceptance of any gifts/other benefits and will then be asked to sign (employee’s signature) the said declaration letter to signify in agreement with the declaration, upon completion to return or submit same to HR Department on or before the designated due date.

## **Article 2**

### **2.0 BUSINESS CODE OF CONDUCT (for Business Entertainment, Gifts and Invitations)**

#### **POLICY**

- 2.1 Employees may not offer any pecuniary or other advantage from any Company’s business associates or from any other parties related to their duties and seeking to conduct business with the Company, either directly or by means of an agent or any third party in order to obtain an “Improper Business Advantage”. Even if there is no actual intent to gain an Improper Business Advantage, in situations where there is a possibility that the particular conduct may be misunderstood as attempting to gain such an Improper Business Advantage, Employees should not, even as social courtesies, offer business entertainment of, or gifts or invitations.

**Note:** “Improper Business Advantage” means any benefit advantage gained through action that is against the business and public order and morals or fair and equitable principles.

- 2.2 “Company’s Business Code of Conduct” sets forth the regulations and high ideals of behavior that all employees are expected to observe in the conduct of business, and these policies and procedures are intended to establish a code of conduct based on the high business and employee ideals that the Company seeks to maintain especially relating to business entertainment of, gifts and invitations to clients/customers, public officials, suppliers or from any other parties.
- 2.3 These policies and procedures apply to the all officers and employees (including, but not limited to, secondees, temporary employees, transferred temporary employees, contract workers and dispatched workers).
- 2.4 Approved Business Entertainments and Gifts
- 2.4.1 When offering business entertainment or a gift to a business associate or public official such entertainment or gift must satisfy each of the categories listed below. Also, before carrying out the actual entertainments or gifts, it is necessary to obtain the advance approval as described in Procedure No. 2.15 below of this Chapter, disclosing the substance of such entertainments or gifts (including the amount of money the Company will spend) and the purpose of such entertainment or gift,.
- Such entertainment or gift is within the range of normal business and social courtesies
  - There are no circumstances that could give rise to misunderstandings about the purpose of the entertainment or gift being intended to gain an Improper Business Advantage
  - Such entertainment or gift is not in violation of the laws or regulations of the official's jurisdiction
  - The amount of money for such entertainment or gift is properly accounted for in accordance with applicable accounting rules on the Company’s books of account
- 2.5 Prohibited Items
- 2.5.1 The following types of entertainments and gifts are uniformly prohibited.
- Gifts of money (including bills/notes, checks, every kind of cash voucher, stock certificates and securities)
  - Entertainments at hostess, strip or similar adult entertainment clubs (when travelling abroad)
  - Any entertainment or gift that is not properly accounted for on the Company’s books of account
- 2.6 When senior management staff (Level 2’s only) need to discuss a particular business project or maintain a form of business relationship, he needs to seek authorization in advance for a business entertainment expense from the Executive General Manager or Human Resource Manager based on the approved budget. In such case, completing the Entertainment Request Form with the date, time, type of hospitality, name of hosts(s), and name of guests is to be pre-approved by the Executive General Manager and then submitted to the Finance & Accounts Department.
- 2.7 The scale of expenditures should reflect the importance of the company guests and the relationships. In addition, the identity, company name of guests and justifications are to be listed in the claim form. Where possible justifications should reflect the business gains or expected gains for BCEC from incurring the entertainment expense.
- 2.8 Entertainment of employees is disallowed.



- 2.9 Where staff members share meals when entertaining business associates, the senior staff present should pay the bill and make sure that the name(s) and occasion are listed, for proper liquidation and/or reimbursement from the Company.
- 2.10 Original receipts are required to claim entertainment expenses. The receipts for the entertainment expenses are claimed by attaching them to the Expenditure Form. Where expenses are shared with QIPCO, a duplicate copy of the receipts will suffice with either a copy of the Expense Claim form submitted to QIPCO or a common expense Claim form showing the specific expenses charged to BCEC.
- 2.11 The limit of the gift offers and within the range of up to QR 2,500 per occurrence and total budget should not exceed to QR 50,000 per year. While the limit of the entertainment expenses and within the province of up to QR 2,000 per occurrence will need the prior approval of the Executive General Manager. However, it should not exceed QR 5,000 per month. Entertainment expenses exceeding QR 5,000 require prior approval of the Executive General Manager and the BCEC Director.
- 2.12 Where senior staff wishes to host business associates or business relationships for a limited number of persons in their home, prior approval of the Executive General Manager is required.
- 2.13 Permitted Expenses for Invitations
- 2.13.1 When offering a travel invitation to a business associate (including travel and lodging expenses), such invitation must satisfy each of the categories listed below. Also, before carrying out such actual invitations, it is necessary to obtain the advance approval as described in Procedure No. 2.15 below of this Chapter, disclosing the substance (including the amount of money the Company will spend) and the purpose of such invitation.
- Such invitation has a valid purpose and no circumstances could give rise to misunderstandings about the purpose of such invitation being intended to gain an improper business advantage.
  - The amount of money to be paid by the Company is limited to a reasonable amount and to the actual expenditure.
  - The money to be paid by the Company is not a way to provide a personal benefit to the business associate.
  - Such invitation is not in violation of the laws or regulations of the client official's jurisdiction.
  - The money paid by the Company is properly accounted for in accordance with applicable accounting rules on the Company's books of account.
- 2.14 Prohibited Expenses for Invitations
- 2.14.1 The following types of expenses for invitations are uniformly prohibited.
- Delivery to a Business Associate or other party personally of money (including bills/notes, checks, every kind of cash voucher, and securities).
  - Payment of travel or lodging expenses for a person who is not directly connected to a proper purpose for the invitation, like the spouse of a business associate (provided, however, for persons who personally bear the cost of the trip, there are situations where offering business entertainment or a gift to such person would be allowed within the range of normal social courtesies).
  - Expenses that are not properly accounted for on the Company's (or such Associated Company's) books of account.



## PROCEDURE

### 2.15 Advance Approval

When offering business entertainments, gifts or invitations to a Business Associate or any other party such as Public Official, if, after reading and reviewing these policies and procedures, the requesting employee (officer or senior staff) determine that the situation conforms to these policies, such persons should accomplish the Entertainment Request Form and submit the proposed conduct to the Human Resource Manager for the advance approval.

#### Requesting Employee (Officer/Senior Staff)

2.15.1 Employee will offer or propose business entertainment, gift or invitation with Company's Business Associate(s).

2.15.2 To fill out and complete the Entertainment Request Form (includes request for Gifts and Invitations), indicating therein details of the request (with the date, time, venue, type of hospitality, name of hosts(s), and name of guests, etc.)

2.15.3 Upon completion of request form, to submit same and seek advance approval from the General Manager.

#### Executive General Manager (EGM)

2.15.4 Approves or disapproves the request. If disapproves, gives it back to the requesting employee, the copy of the disapproved request form with EGM's remarks or comments. If approves, the EGM signs on it and gives it back to the requesting employee and forward same to the Finance & Accounts Department for processing of request.

#### Finance Department

2.15.5 To process the request and release the approved budget for the entertainment expenses.

### 2.16 Liquidation or Reimbursement of Expenses

#### Requesting Employee

2.16.1 Collate all the original receipts incurred for this purpose. The requesting employee need to submit the Original Receipts (O.R.) to claim entertainment expenses.

2.16.2 To accomplish the Expenditure Form and/or Expense Claim Form, attaching therein all the original receipts incurred for the entertainment expenses and submit same to the Finance & Accounts Department for settlement. Where expenses are shared with QIPCO, a duplicate copy of the receipts will suffice with either a copy of the Expense Claim form submitted to QIPCO or a common expense Claim form showing the specific expenses charged to BCEC.

### 2.17 Advance Consultation Window

In the event of situations where you are unable to judge solely from these policies and procedures whether certain business entertainment, gifts or invitations for business associates or other parties would be allowed, including the appropriate level of amount thereof, please consult beforehand with the relevant Department Head or Compliance Officer in-charge of your department's business transactions to provide proper guidance and judgment.

## 2.18 Channels for Consultation and Reporting of Violations

If it should happen that an Employee discovers conduct that was in violation of these policies and procedures, such Employee should use the channels in reference with Company's Grievance Policy and Procedure for reporting and consulting regarding the compliance, and/or inform Human Resource Manager of such occurrence.

### Article 3

#### 3.0 **EMPLOYEE AND BUSINESS CODE OF CONDUCT GUIDELINES DECLARATION POLICY**

3.1 The Company will ensure that all employees (either newly recruited or old employees) have read and understood the policies and procedures pertaining to Employee and Business Code of Conduct of the Company. Each employee will be required to sign in the Declaration Letter to signify his acknowledgement and declaration that he will abide and comply with the said guidelines during his employment with the Company.

3.2 In case of any revision or amendment made in this policy and procedure, all employees shall still be asked and required to sign in the Declaration Letter.

3.3 The Declaration Letter shall be issued and distributed by the **HR Department** to employee on his joining date and from time to time, as it may deem necessary and applicable. The signed document letter shall be kept and filed by within the HR Department.

- End of this Chapter-



# PROCEDURE

## INTEGRATED MANAGEMENT SYSTEM (IMS)

## MANAGEMENT REVIEW



### REVISION HISTORY

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
9	07.09.2009	Audit reports added:	14.09.2009
10	24.10.2009	Changes to comply with OHSAS 18001:2007 version	27.10.2009
11	05.05.2010	QHSE Procedure Manual revised as per ISO9001 : 2008	12.05.2010
12	03.03.2014	Re-validated with minor changes to comply with ISO 14001:2004 standard.	10.03.2014
13	22.05.2016	Re-issue with minor changes on the contents. Update on Signatories; Replaced/re-named Executive General Manager (EGM) to Chief Executive Officer (CEO) wherever mentioned in the whole procedure document; Revised Section/Clause nos. 3.1 & 7.0.	29.05.2016
14	16.08.2018	Revised to comply with new version of ISO 9001:2015 Standard; ISO 14001:2015 & ISO 45001:2018	16.08.2018

Action	Responsible	Signature	Date
Initiated & Prepared by:	D. Guinto		16.08.2018
Checked & Reviewed by:	C.P. Gibson		16.08.2018
Approved by:	P. Borchetta		16.08.2018

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**1.0 INTERNAL CONTROLS**

**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this Procedure.

The **Health, Safety, Environment & Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

**1.2 APPROVAL**

This procedure and any amendments made thereto; require the following approvals:

**Authority**

**Date**



HSEQ Manager and  
Management Representative (MR) QHSE

16/08/2018



Chief Executive Officer

16/08/2018

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed 

Date 16/08/2018

## 2.0 OBJECTIVE

2.1 To confirm that Black Cat Engineering and Construction W.L.L. Quality Management System, Health, Safety and Environmental (HSE) systems are suitable and effective in fulfilling the requirements of the ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 and the commitments made in the Company's QHSE Policy and Procedure Manual.

## 3.0 SCOPE

3.1 This procedure covers all areas of the Company's operations that affect the Quality and HSE of its services and activities.

## 4.0 RESPONSIBILITY

4.1 The **Management Representative (QHSE)** is responsible for periodic review of the Company's QHSE System to ensure suitability and compliance at all levels. He reports on a regular basis to the Chief Executive Officer on the performance of the QHSE System and proposed improvements, if any.

4.2 The **Chief Executive Officer** is responsible for chairing the Management Review Meetings and ensure the performance of the QMS, OHSMS and EMS for the period since last Management Review Meeting had been reviewed in detail and all issues raised are resolved with necessary corrective and preventive actions taken.

## 5.0 PROCEDURE

5.1 Management Review Meeting (MRM) shall be conducted once every month, the **Chief Executive Officer, MR(QHSE)** and other Department Heads should hold a Management Review Meeting (MRM) and this period may increase/decrease based on the performance of the company to assess the following, in addition to the Management Review Meetings Agenda.

- a) Current and future requirements of the Company
- b) Current Department performance based on agreed objectives
- c) Assessment of the Internal and External Audits of the Company.
- d) Training requirements
- e) Customer Satisfaction/Complaint and Feedback from relevant Interested parties
- f) Resources.

5.2 In the Management Review Meeting, the Company's QHSE System is reviewed to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction of the organization and in satisfying the Company's requirements such as the QHSE Policy and Objectives, and the ISO 9001:2015, ISO14001:2015 & ISO 45001:2018 requirements. Also the items on the agenda shown in Appendix A of this procedure are discussed in the Management Review Meetings.

5.3 MRM shall also cover and discuss action plan for any of the agenda that requires review and/or action to be taken, to specify the time line/completion date, and assist respective persons /name of responsible person, the status of actions through Action Tracking Register (ATR). Senior Management/Members of MRM shall make a follow up to ensure that the action was effectively implemented and to discuss same to next MRM.

5.3 All corrective and preventive action forms that have resulted from a customer complaint, non-conforming service or internal audits are discussed in the Management Review Meeting. Corrective and Preventive actions taken to eliminate the potential causes of non-conformity are assessed for the effectiveness of the corrective / preventive actions taken and for outstanding forms, if any, a close-out schedule is finalised.

5.4 Minutes of these meetings are taken and reviewed in the following Management Review Meeting to ensure that timely actions are taken on the issues agreed.

## 6.0 RELATED PROCEDURES

6.1 All procedures.

## 7.0 DOCUMENTATION

7.1 Minutes of the Management Review Meetings

7.2 Non-Conformance Report (NCR) Register (Department/Project) for IMS Internal Audits

7.3 BCEC/QS-11/Rev.XX-Non Conformity Report (Projects)

7.4 BCEC/QS-11A/Rev.XX-Audit Non Conformity Report (IMS Internal Audit)

7.4 BCEC/QS-12/Rev.XX-Suggestion Form

(Note: Rev. XX indicates current Revision number at the point of use)

## 8.0 RECORDS

8.1 Minutes of the Management Review Meeting are recorded and retained by the **Management Representative** for QHSE for at least three years.

**9.0 APPENDIX A**

**MANAGEMENT REVIEW MEETING (MRM) AGENDA**

1.	Apologies for absence
2.	Minutes of the last meeting and follow up actions from previous management reviews
3.	HSEQ matters – Review of accidents and incidents and other related topics
3.1	Concerns
3.2	Corrective and Preventive Actions
4.	Supplier / Subcontractor concerns
4.1	Concerns
4.2	Corrective and Preventive Actions
5.	Changes in relevant Internal and External Issues
6.	Customer Satisfaction/Customer Complaints/Feedback from relevant interested parties
7.	Internal and External Audits
7.1	Internal Audit
7.2	Sub-contractor Audit
7.2.1	Concerns on Audit outcome
7.2.2	Corrective & Preventive Actions
7.3	External Audit
7.3.1	Concerns on audit out come
7.3.2	Corrective & Preventive Actions
8.	Certification Body Reports
9.	Changes in organization's activities
10.	Changes in Legislation and Standards
11.	Competence and Evaluation of Training
12.	Process performance and product conformity
13.	Improvement of effectiveness of the Quality Management System and Health, Safety and Environmental System
14.	Review of QHSE performance statistics and commitment for continual Improvement
15.	Review of QHSE Policy, Objectives and Programs

16.	Any resource needs or requirements
17.	Current and Future Requirements of the Company
18.	Recommendations for Improvement – Action, Responsibility, Time scale
19.	Review of the effectiveness of the corrective / preventive actions taken
20.	Results of evaluation of compliance with legal and other requirements
21.	Review of external communications
22.	Any other business related issues



# CHAPTER 10

## HUMAN RESOURCES

### EMPLOYEE GRIEVANCES



## EMPLOYEE GRIEVANCES

Any difference in opinion, controversy or dispute between the Company and any employee concerning any co-employees and/or Management Staff, or any term or condition of employment involving employees shall be considered a Grievance. All grievances shall be submitted and considered in accordance with these policy and procedure.

The purpose of this policy is to ensure that all employee grievances are handled fairly and professionally in order to maintain a satisfying and healthy working environment and to provide aggrieved employees the proper procedure through which their grievances are to be addressed to ensure a conducive working environment where employees realize their full potential and their performance is not hampered due to unresolved differences.

The Company strives to continuously improve the quality of work life for our employees by quick identification and resolution of staff grievances.

### Key Processes

The following are the key processes identified in this chapter:

- Article 1 – Policy
- Article 2 – Responsibilities
- Article 3 – Procedure
- Article 4 – Employee Review Committee (ERC)

### Article 1

#### 1.0 POLICY

- 1.1 This policy has been written so that both the employee needs and the needs of the business are taken into consideration. This policy attempts to:
- Resolve grievances promptly in a fair and equitable manner;
  - Prevent grievances from escalating;
  - Provide the employee with advice and support;
  - Maintain a healthy and stable work environment
- 1.2 This policy has been written for all employees and the HR department staff who will find it useful when:
- Considering the concerns or complaints of employees
  - Deciding upon the best course of action to advise or support the employee
- 1.3 Employees who have a complaint will find that complaints fall under the BCEC's Grievance Principles:
- All employees are encouraged to speak directly to the "other party" before accessing the Grievance Procedure in order to resolve the point of dissatisfaction.
  - The Company understands however that in some cases this may not be possible and so the Grievance Procedure should be followed.
  - All employees have a right to access the Grievance Procedure.
  - All employees can access information on the Grievance Procedure.
  - All employees know and can contact the Grievance Officer.
  - The Grievance Officer is specifically trained for the role and provides advice and support based on a structured approach to promptly and equitably investigate a grievance.
  - All investigative notes, documents, findings, recommendations and reports concerning employee grievances must be treated as confidential and maintained in a secure area at all times.



- 1.4 In implementing this policy and procedure, the general reference and the supporting documents that could be referred to are as follows:
- Company's Employee and Business Code of Conduct
  - Grievance Procedure

## Article 2

### 2.0 RESPONSIBILITIES

The HR Department shall be responsible for mediation in an attempt to arrive at a satisfactory solution and confirm any decision or proposed action to the employee. The responsibilities for all actions in this regard are as follows:

Employee	Responsible for utilizing the Grievance Procedure in order to avoid escalation.
Direct Supervisor or Department Head	Responsible for supporting the employee, for following the Grievance Procedure and for striving for a prompt and equitable resolution.
Human Resource Manager	Responsible for ensuring that Grievance Policy and Procedure is communicated to all employees and utilized when necessary to avoid escalation
Grievance Officer	Responsible for keeping up to date with and utilizing the Grievance Procedures when supporting and advising employees. Responsible for maintaining records in a secure place. Grievance Officer is a designated HR Officer duly approved to carry out this responsibility.
Employee Review Committee	Responsible for handling any appeal of the HR Department findings and disciplinary recommendations. Ensures that all employee grievances are handled promptly and equitably. Also responsible for ensuring follow up by working with HR Department in amending policy, systems or procedures to prevent any recurrence and ensure continuous improvement of employee working environment.
Human Resource Manager	Responsible for ensuring Grievance Policy and systems are in place in the company.

## Article 3

### 3.0 PROCEDURE

In the event that an employee has a serious concern, issue, complaint or grievance concerning company policy, performance appraisal or treatment by another employee or manager; every employee is entitled to have his/her grievances investigated and is encouraged to utilize the following Grievance Procedure

#### 3.1 Level 1

- 3.1.1 The employee is encouraged to speak directly to the 'other party' involved concerning the grievance.
- 3.1.2 If consultation is not possible for whatever reason or has not been successful, the employee should consult their one up supervisor and/or manager. If this too is not possible for whatever reason or has not been successful the employee should move to Level 2 of Grievance Procedure.

### 3.2 Level 2

- 3.2.1 The employee arranges an interview with the Grievance Officer (GO).
- 3.2.2 The GO documents the interview and assures the employee of a prompt and equitable investigation.
- 3.2.3 Documents are filed confidentially in a secure HR area.
- 3.2.4 The GO initiates an investigation into the complaint which must be prompt and equitable in its fact finding and determinations. GO follows up grievance complaint with the “other party” involved and any other witness as required.
- 3.2.5 GO will prepare a written report and make findings and recommendations. GO will consult with Human Resource Manager on proposed recommendations.
- 3.2.6 The GO must provide feedback as soon as possible to the employee concerning any outcomes of actions at this stage and maintain records.
- 3.2.7 If there is no satisfactory resolution at this stage then move to Level 3.

### 3.3 Level 3

- 3.3.1 GO consults with Human Resource Manager who assumes control of the grievance resolution process.
- 3.3.2 Human Resource Manager will review GO findings and recommendations and if after speaking with the concerned party conduct (*if necessary*) their own investigation and only amend or revise the findings if deficiencies are found.
- 3.3.3 Human Resource Manager must provide personal feedback as soon as possible to the employee concerning any outcomes of actions at this stage and ensure records of action and outcomes are maintained.
- 3.3.4 If no satisfactory resolution is achieved at this stage, the employee may file a written appeal to the Human Resource Manager, proceed to Level 4 – Appeal Process.

### 3.4 Level 4 – Appeal Process

- 3.4.1 Human Resource Manager (HRM) will convene an Employee Review Committee (ERC) to address employee’s appeal. ERC will review HRM and GO findings and recommendations in light of employee’s appeal. Each ERC member must confirm or disagree with the findings and/or recommendations setting the basis for their decision.
- 3.4.2 Based upon the findings of the investigations and review by the Employee Review Committee (ERC), the Chief Executive Officer and the Human Resource Manager will arrive at a fair and equitable resolution.
- 3.4.3 Depending on the nature of the grievance the next steps would most likely take the form of:
- Amendment or development of Company procedures to prevent recurrence
  - Strong disciplinary action
  - Staff transfers
  - Legal solutions
  - Compensation Penalty (salary deductions)
  - Termination



3.4.4 In all cases the Human Resource Manager will inform the employee of the final decision regarding their appeal. When disciplinary recommendations are confirmed the Human Resource Manager will initiate disciplinary action procedures outlined in Chapter 11 – Employee Discipline.

### 3.5 Investigation Procedure

3.5.1 Investigation of any alleged violation(s) shall be prompt and equitable.

3.5.2 A prompt investigation means it must be completed within seven days of the grievance being raised. An equitable investigation requires that as soon as practicable all concerned parties must be interviewed about the grievance. As a minimum, the alleged perpetrator (*if any*) of the incident and witnesses (*if any*) must be interviewed to determine their version of the facts.

3.5.3 The investigator must make a determination of events and write up detailed findings and recommendations. The report must set out the basis for the investigator's recommendations which shall be attached to Corrective Action Disciplinary Form. The investigator will provide a report and forward it to the Human Resource Manager for review and final disposition. All notes regarding the investigation shall be treated as confidential and maintained by the HR Department in a secure area at all times.

## Article 4

### 4.0 BCEC EMPLOYEE REVIEW COMMITTEE

4.1 An Employee Review Committee (ERC) is the proper venue to hear an appeal of an employee's grievance. Refer to Article 2 of Chapter 11 – Employee Discipline.

4.2 The Employee Review Committee Members may be made up of no less than three of the following (but not to include concerned employee's Department Manager):

- Chief Executive Officer (Chair)
- Manager – Operational Service, Business Improvement & IT
- Manager – Commercial, Human Resource & Administration
- Manager – Projects
- Manager – HSEQ
- Manager – Technical
- Manager – Proposals
- Designated HR Officer and/or Grievance/Compliance Officer

*-End of this Chapter-*



# LABOUR

Black cat labor practices are in accordance with its policies and activities, including Sub-contracted work.

Responsible labor practices should encompass:

- Employment and contractual relationship
- Health and safety at work
- Human development and training in the workplace
- Industrial Hygiene
- Allow grievance mechanism
- Social dialogue and tripartite consultation



# LABOUR initiatives

## includes, but not limited to:

- Black Cat restrict Child employment (below 18 years of age)
- Black Cat strictly follow Qatar Labor Law related to Force labor and minimum wages act.
- HR Policy and Procedure has been prepared to state clearly about employees right, responsibilities, compensation and benefits.
- Black Cat provides equal opportunity to all and does not discriminate in employment, promotion, wages, benefits, religion, color, national origin, marital status, sex, sexual orientation, disability or age (except under 18 years of age).
- Health and Safety Risk Assessments are being carried out to identify and control to protect employees
- Health and Life Insurance are provided to all Black Cat employees.
- Recreation and Gym facilities are provided to ensure well being of all employees.
- Black Cat established Corporate Performance Standard Committee to monitor the progress and the commitment on aligning its daily operations within a sustainable manner.



# Initiatives towards community/employees:

- Black Cat sponsorship of employees sporting events to strengthen organizational cohesion .



# **“ORGANIZATIONAL HEALTH INDICATOR (OHI)”**

**How Leadership & Social Responsibility Can Drive Organizational Health Improvements**



# THE NINE (9) DIMENSIONS OF THE ORGANIZATIONAL HEALTH INDICATOR (OHI)



Dimensions of Organizational Health which influences outcomes of, or are influenced by the SR strategy implementation



# 39 MANAGEMENT PRACTICES ASSOCIATED WITH THE 9 DIMENSIONS - 1

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## Direction (3)

- Shared Vision
- Strategic Clarity
- **Employees Engagement**

## Accountability (4)

- Role Clarity
- **Performance Contract**
- Consequence Management
- **Personal Ownership**

## Coordination & Control (5)

- People Performance Appraisal
- Operational Management
- Financial Management
- Professional Standards
- Risk Management

## Leadership (4)

- Authoritative
- Consultative
- Supportive
- Challenging

## Innovation & Learning (3)

- Top-Down Innovation
- **Bottom-Up Innovation**
- **Knowledge Sharing**

**Social Responsibility program outcome related practices**

## 39 MANAGEMENT PRACTICES ASSOCIATED WITH THE 9 DIMENSIONS - 2

### External Orientation (6)

- Monitoring External Business Environment
- Capturing External Ideas
- Customers Focus
- Competitive Insights
- Business Partnerships
- **Government & Communities Relationships**

### Capabilities (4)

- **Talents Acquisition**
- **Talents Development**
- Process-Based Capabilities
- Outsourced Expertise

### Motivation (5)

- **Meaningful Values**
- Inspirational Leaders
- **Career Opportunities**
- **Financial Incentives**
- **Reward & Recognition**

### Culture & Climate (5)

- **Open & Trusting**
- Internally Competitive
- Operationally Disciplined
- **Creative**
- **Entrepreneurial**

**Social Responsibility program outcome related practices**

# DEFINING THE BLACK CAT “HEALTH RECIPE” - WORKSHOP

R . C O M

## DIMENSIONS

- Direction
- Accountability
- Coordination & Control
- Leadership
- Innovation & Learning
- External Orientation
- Capabilities
- Motivation
- Culture & Climate

Shared Vision	Strategic Clarity	Employees Engagement			
Role Clarity	Performance Contract	Consequence Management	Personal Ownership		
Performance Appraisal	Operational Management	Financial Management	Professional Standards	Risk Management	
Autoritative	Consultative	Supportive	Challenging		
Top-Down Innovation	Bottom-Up Innovation	Knowledge Sharing			
Monitor Ext. Buss. Environment	Capturing Ext. Ideas	Customer Focus	Competitive Insights	Business Partnerships	Gov.t & Communities Relationships
Talents Acquisition	Talent Development	Process Based Capabilities	Outsources Expertise		
Meaningfull Values	Inspirational Leaders	Career Opportunities	Financial Incentives	Reward & Recognition	
Open & trusting	Internall Competitive	Operationally Disciplined	Creative	Entrepreneurial	





كبو ال إم لتأمينات الحياة والتأمين الصحي  
QLM Life & Medical Insurance Company

# Black Cat Engineering & Construction W.L.L.

DOHA, STATE OF QATAR

**GROUP LIFE & PERSONAL ACCIDENT INSURANCE**  
**POLICY NUMBER: P2109300329**

Issued by



كبو ال إم لتأمينات الحياة والتأمين الصحي  
QLM Life & Medical Insurance Company

*(Regulated by the Qatar Central Bank vide license no 116849)*

P.O. Box: 12713, Doha, State of Qatar

Please check the policy document carefully and ensure that it is drawn in accordance with your requirements in all respects and should any amendments be required, please inform us immediately

## Group Life & Personal Accident Insurance Policy

<b>Insured:</b>	<b>New Policy No:</b>
<b>Black Cat Engineering &amp; Construction W.L.L.</b> Doha, State of Qatar	P2109300329
	<b>Renewal &amp; Replacement of Policy No:</b>
	P2009000283
	<b>Renewal Premium</b>
<b>As Agreed,</b>	
<b><u>Policy Inception Date:</u></b>	<b><u>Expiry Date:</u></b>
01 <sup>st</sup> Aug 2021	31 <sup>st</sup> Jul 2022

In consideration of the Insured having paid or agreed to pay the renewal premium mentioned herein the within policy is renewed for 12 months as mentioned in the Schedule attached.

Life Assured/Individual Sum Insured: As per list attached.

All other terms, exceptions, limitation, and conditions of the policy remain unaltered as mentioned in the expired policy P2009000283.

For and on behalf of

**QLM Life & Medical Insurance Company QPSC**  
(The Insurer)

Name: G. Narayan Rao  
Designation: Chief Operating Officer  
Date: 04<sup>th</sup> Aug 2021

Seal of Insurer



For and on behalf of

**Black Cat Engineering &  
Construction W.L.L.**  
(The Master Policyholder)

Name:  
Designation:  
Date:

Seal of Master Policyholder

# CHAPTER 5

## HUMAN RESOURCES

# EMPLOYEE COMPENSATION AND BENEFITS



## EMPLOYEE COMPENSATION AND BENEFITS

### Key Processes

The following are the key processes identified in this chapter:

- 1) Article 1 – Salary Structure
- 2) Article 2 – Salary Review
- 3) Article 3 – Allowances and Benefits
- 4) Article 4 – Payroll Processing
- 5) Article 5 – Official Business Travel

### Article 1

#### 1.0 SALARY STRUCTURE

- 1.1 It is the policy of the Company to design and implement an integrated salary structure which maintains relationships among Job Grades, maintains internal equity to recruit, motivate and retain effective staff. The policy aims to be fair and consistent in the application of the salary and compensation system and provides for updating the system to keep abreast with market and changing trends.
- 1.2 The Head of Human Resource is the custodian of the Salary Scale of BCEC and the benefit and allowance structure, which is a confidential document. Together with the Chief Executive Officer, they will determine the list of individuals who will have access to this information.
- 1.3 Information indicated in the Company's Salary Structure per Job Grade Level/Job Classification are as follows:
  - a.) Compensation Rate
  - b.) Minimum, Mid Point and Maximum Rate
  - c.) Allowance Entitlement and corresponding Amount
- 1.4 An employee's salary structure is divided into the following:
  - a.) BASE PAY – The rate of payment for the work done by the employee in a period of 48 hours.
  - b.) OTHER ALLOWANCE – Is payment made applicable for (overtime or living allowance or hardship allowance).
  - c.) HRA – House Rent Allowance. *Please refer to Article 3.4 of this chapter.*
  - d.) TRANSPORTATION ALLOWANCE – *Please refer to Article 3.8 of this chapter.*
  - e.) TECHNICAL ALLOWANCE
- 1.5 New employees shall normally start at the minimum salary of their designated salary grade.
- 1.6 In special cases of merit due to the employee's skills, experience and other relevant competitive factors, the concerned Department Head may, in consultation with the Head of Human Resource, review and approve the starting salary.
- 1.7 For a new (non-existing) job, a job evaluation shall have to be conducted by the HR Department in consultation with the concerned Department Head to determine its job and salary grade which shall be assigned to the recruit.

## Article 2

### 2.0 SALARY REVIEW

- 2.1 The Company shall from time to time review the salaries of staff during a consultation meeting with the Chief Executive Officer (CEO) and/or Staff Management Committee, in line with individual performance and other market related developments.
- 2.2 The designated HR Staff will conduct and/or participate on a salary survey and collect data that can be used by the Company as a basis for Salary Re-Structuring, general reference for comparison of current Company's Salary Structure and to check the current market trend/value so that the Company will remain competitive in terms of hiring and retaining high performance employees.
- 2.3 The following are the standard information and data to be collected in conducting salary review:
- Average range of annual pay Increments
  - Timing of administering/distributing annual pay increments
  - Right for decision of salaries
  - Bonus/incentive scheme
  - Allowances provided
  - Salary per job designation
  - Salary per job grade level
- 2.4 The Board of Directors will approve all salary reviews and bonuses upon recommendations of the Chief Executive Officer, in consultation with the Staff Management Committee.

## Article 3

### 3.0 ALLOWANCES AND BENEFITS

#### 3.1 POLICY

- 3.1.1 In addition to the employee's monthly basic salary, BCEC may provide allowances and benefits to meet differing needs of its employees to compensate them for specified activities associated with their work and to recognize any specified requirements of their job. The allowance which may possibly be paid will be consistent with the standards appropriate to the employee's position. It will take into consideration the occupation as being worked under pressure and requiring added allowances and benefits to the basic salary as incentive. The Chief Executive Officer and/or Staff Management Committee will review the occupations to warrant the additional allowances, taking into consideration the issues substantially affecting the ability to recruit and retain competent people.
- 3.1.2 If the circumstances of an individual employee should change, which thereby making him/her ineligible for certain allowances either permanently or for certain period, the Company shall have the right to alter or withdraw these allowances.
- 3.1.3 All allowances and/or benefits of an employee shall be paid according to the guidelines set forth by the HR Department unless otherwise specified in the individual Employment Contracts.
- 3.1.4 The Department Managers shall ensure that the Head of Human Resource is kept fully informed of any changes in employees' status or activities which may affect their eligibility for allowance.

3.1.5 The Head of Human Resource shall recommend the eligibility of each employee to receive allowances and shall calculate and process payment to the employee. The Head of Human Resource will seek approval of the CEO and/or Staff Management Committee to approve the payment of the allowances in all cases.

3.1.6 The employees have the obligation to notify their Managers of any changes in their circumstances which may affect their eligibility for allowances.

### **3.2 Range and Value of Allowance/Benefits**

3.2.1 The definitions, range and amounts/value of allowances and benefits and how they are administered are detailed below and summarized in Annex II.

### **3.3 Family Status**

3.3.1 Levels L4 and above, subject to the approval of the CEO and/or Staff Management Committee, may be eligible to the entitlements of a family status at company expense with a condition that they have their eligible dependants reside with them in the State of Qatar in no less than eight months of each calendar year.

3.3.2 The spouse and not more than three (3) children under the age of eighteen (18) years for levels (L1 & L2), who, by the terms and conditions of the Employment Agreement, are authorized to reside with the staff in the State of Qatar at Company's expense.

3.3.3 Eligible family benefits are those Company paid benefits that accrue to such dependants as a result of the Employment Agreement with the staff member and the Company, as outlined in Annex I. Entitlement to, and use of those benefits by eligible dependants may not be exercised until the staff members have fulfilled the criteria for his entitlement to similar benefits in his own right, which is the successful completion of the probationary period and the issuance of the family member's Qatari Resident Permit.

3.3.4 The Company will not sponsor the family visas of staff who have not been granted family status.

3.3.5 Whenever a staff of Level L4 and above is hired on single status, it must be made clear to them that the Company will not sponsor the visas of their dependents to join them unless an approval is obtained by the CEO. They cannot apply for HRA or Family Status until after they have at least completed two (2) years of service with the company and has a minimum performance rate of EE (Exceeding Expectations).

3.3.6 Employees who, as per grade and contract are entitled to HRA or Family Status, but due to the absence of family, wish to instead avail two tickets per year will be granted of such perk six months after the date the employee's HRA was last issued.

Eligible employees who joined BCEC on Single Status and are initially getting two tickets per year, but brought their families to Qatar for Permanent Residency, will automatically get to avail only one annual ticket, one year after the arrival of the employee's family or the date the HRA is first issued.

### **3.4 Housing Allowance (HRA)**

3.4.1 Staff may seek and arrange for their own housing accommodation either on a single or family accommodation, provided that they are not receiving Company accommodation, subject to the approval of the Head of Human Resource. In such cases, the staff member will be given an HRA in an amount to cover actual costs of rent and utilities at the established maximum ceiling rate or salary band within the staff job grade level.



The values are for the HR Department's use only and are not compulsory and on a case by case basis. These are subject to change from time to time depending on the current market value. HRA is not a source of income and is purely on actual costs basis within the ceiling rate.

Table 3.4

Salary Grade	Position Level	Married (QR)	Single (QR)	
L1	Executive	FOR HRD USE ONLY		
L2	Senior Managers			
L3	Managers			
L4	Lead Staff			
L5	Senior Staff			
L6	Staff			
L7	A			Superintendent
	B			Supervisors
	C			Foreman
L8	Junior Staff			

- 3.4.2 For category L3 who are entitled to a staff utility allowance as per CEO and/or Staff Management Committee approval and, payment of house utilities such as water and electricity bills shall be the actual amount up to established limit of QR **250** per monthly consumption, any amount that will exceed this limit shall be deducted from their salaries.
- 3.4.3 Staff who brought their families to Qatar but have been granted single status and Company accommodation as per their contract agreement will not be granted HRA or transportation allowance, unless approved by the CEO on an exceptional basis. They cannot apply for HRA until after they have at least completed two (2) years of continuous service with the Company and has a minimum performance rate of EE (Exceeding Expectations). In any case, housing allowance will still be payable to staff sponsored by the company, wherever the Company provides no accommodation.
- 3.4.4 When staff are promoted to a higher grade, their HRA will not automatically be increased to the level of the new grade. Any increase will be considered together with a review of salary or other benefits using normal company review procedures.
- 3.4.5 Taking into consideration the employee's Leave Settlement, the value of HRA will be computed as per the number of days of leave entitlement only and not as per number of days of approved leave in case the employee had exceeded the period of his leave beyond prescribed annual leave entitlement.
- 3.4.6 If the employee is being provided a separate accommodation, under Company's name or receiving a monthly housing allowance (HRA), and the employee applied/extended his leave beyond the prescribed annual leave entitlement and/or had taken an unpaid /emergency leave, the employee shall take full responsibility of paying the rent and/or shall not receive a housing allowance (HRA) for the period exceeding the annual leave entitlement and/or for the period covered by the unpaid leave(s).
- 3.4.7 Where employee has been granted unpaid leave based upon a genuine business necessity, the housing allowance (HRA) of employee will continue.
- 3.4.7 Consequently, employees staying in the Company-provided accommodation, shall be charged an amount equivalent to the cost of rent for the accommodation through salary deduction for the period covered by the unpaid leave(s) **unless, the employee vacate the room and surrender the accommodation keys to allow the Company to allocate the room to another employee.**

In all cases of sick leave with or without pay, the employees will continue to receive their housing allowance (HRA) for the period covered by their sick leave.

### 3.5 Furniture Allowance

- 3.5.1 BCEC will provide a one time furniture allowance to L1 and L2 categories. Furniture allowance will be provided as per table 3.5 below, in the condition that staff entitled to it are not residing in a furnished accommodation.
- 3.5.2 The furniture allowance for L1 and L2 categories will be amortized over five years. In the event that an employee leaves the company before the end of five years within which the value of the furniture allowance is to be fully amortized, he/she will pay the remaining balance to the company or the company will deduct the balance from the employee's end of service package.
- 3.5.3 For categories L3-L6 the entitlement to furniture allowance is subject to CEO and/or Staff Management Committee approval and the BOD (Board of Directors) The furniture allowance entitlement will be amortized and granted as an allowance on a monthly basis over a period of five years (60 months).

Table 3.5

Salary Grade	Position Level	Married QR	Single QR
L1	Executive	-	-
L2	Senior Managers	-	-
L3	Manager	*30,000	*20,000
L4	Lead Staff	*25,000	*15,000
L5	Senior Staff	*20,000	*10,000
L6	Staff	*15,000	*7,500
L7	A Superintendent	N/A	
	B Supervisors	N/A	
	C Foreman	N/A	
L8	Junior Staff	N/A	

**Note:** \* The granting of furniture allowance on grades L3-L6 require special approval (Please refer to Item 3.5.3)

### 3.6 Home (Vacation) Ticket

- 3.6.1 All expatriate staff who completed one (1) year of continuous service will be entitled to a 2-way fully paid sector-proved destination ticket during their annual leave over the cheapest air fare available at the time of leave, unless otherwise stipulated in their employment contract. Preference is still given to the least time-consuming and most direct route, if such routes are available at the cheapest rate. This is in fulfilment of BCEC's obligation to the staff under the terms and conditions of the Agreement as per entitlements and classes of ticket as set forth in Table 3.6 below.
- 3.6.2 All expatriate workers who completed a two (2) year of continuous service will be entitled to a 2-Way fully paid sector-proved destination ticket every other year during their annual leave over the cheapest air fare available at the time of leave, unless otherwise stipulated in their employment contract. Preference is still given to the least time-consuming and most direct route, if such routes are available at the cheapest rate. In case when a Worker get promoted to Staff during his first year of employment, said employee gets to avail of once a year ticket effective from his last date of arrival. In case of promotion right after completion of one year employment, then he gets to avail once a year ticket effective from the date of promotion.

- 3.6.3 Upon completion of 12 months of employment, L1 and L2 levels are eligible to receive annual leave allowance payments per employment contract terms in lieu of their entitlements to their annual air-tickets..
- 3.6.4 These annual leave allowance payments for L1 and L2 levels will be paid in March salary each year. Vacation timings and frequency of leaves shall be based and dependent on BCEC's operational requirements.
- 3.6.5 In the event that L1 and L2 levels do not complete the said year for whatever reason, or a conclusion of contract by any of the concurring parties transpires, the pro-rated amount of this payment shall be calculated against their net service and will be deducted from their final settlement, given the fact that the cash payment was for a full year's entitlement.
- 3.6.6 In no event will cash in lieu be paid for other Levels of staff who choose to remain in Qatar. If the staff chooses to travel via another less expensive means of transportation either by air, land or sea, then an amount of money equivalent to 75% of the least cost round trip ticket will be paid to the staff
- 3.6.7. Employees may not request to back charge against their salaries/leave settlements any preferred bookings, ticket purchases, and family-related bookings beyond their entitlements. HR will still assist employees to find bookings related to the above and get fare quotations from Company's accredited travel agency. Purchases made will have to be paid by the employee in cash to travel agency. This does not affect the employee's self ticket entitlement, as well as Senior Staff who are eligible for Family Status.
- 3.6.8. No employee may be allowed to leave office during the working hours for the purpose of arranging the personal tickets from outside travel agencies, as stipulated in the employee's signed undertaking, in lieu of Family Visa application.
- 3.6.9. Employees who, as per grade and contract are entitled to HRA or Family Status, but due to the absence of family, wish to instead avail two tickets per year will be granted of such perk six months after the date the employee's HRA was last issued.

Eligible employees who joined BCEC on Single Status and are initially getting two tickets per year, but brought their families to Qatar for Permanent Residency, will automatically get to avail only one annual ticket, one year after the arrival of the employee's family or the date the HRA is first issued.



Table 3.6

Salary Grade	Position	No. of family members	Travel Class
L1	Executive	5*	Business class for self, spouse and children
L2	Sr. Managers	5*	Business class for self, spouse and economy for children
L3	Managers	4**	Economy class
L4	Lead Staff	2***	Economy class
L5	Senior Staff	1****	
L6	Staff		
L7	A Superintendent	1****	Economy class
	B Supervisors		
	C Foreman		
L8	Junior Staff	1****	Economy class

- \* Self, Spouse and max of 3 children (under 18)  
 \*\* Self, Spouse and max of 2 children (under 18)  
 \*\*\* Self and Spouse  
 \*\*\*\* Self

### 3.7 Company Cars and Transport

- 3.7.1 Company will provide fully maintained company cars to the Executive and Senior Managers at L1 and L2 levels. The Executive will be provided with a four-wheel car, which value would be up to QR 150,000 while the Senior Managers will be provided with four-wheel cars, which value would be up to QR 110,000.
- 3.7.2 Company may also provide key project staff with company cars if the nature of their work at Company requires the full use of a car for business purposes. Staff on Levels 3-8 need to be aware that the provision of a Company car is a privilege and not an entitlement. If it is perceived that the staff no longer needs the car for Company business purposes, then it will be withdrawn after consultation between the Chief Executive Officer, the relevant Sr. Manager and the Head of Human Resource has been made. In all cases, one month's notice will be given to allow time for the concerned staff to make alternative transportation arrangements.
- 3.7.3 The value and type of cars provided to a staff will be determined by the Head of Human Resource in coordination with the Chief Executive Officer. The Company will incur the cost of gasoline, repair and maintenance, insurance and car registration. However, the individual staff will be responsible for any traffic fines levied as a result of commission or omission of traffic rules.

### 3.8 Transport Allowance

- 3.8.1 In the event that the Company is not in a position to provide a company car and/or transport employees in grades L3 to L8, it will provide a monthly transport allowance based on the employee's grade as follows: (The values are for the HR Department's use only and are not compulsory and on a case by case basis. These are subject to change from time to time depending on the current market value.)

Table 3.8

Salary Grade		Position Level	Travel Class
L1		Executive	FOR HRD USE ONLY
L2		Senior Managers	
L3		Managers	
L4		Lead Staff	
L5		Senior Staff	
L6		Staff	
L7	A	Superintendent	
	B	Supervisors	
	C	Foreman	
L8		Junior Staff	

- 3.8.2. In addition to the transport allowance per grade, an amount of QR 500 per 26 out-of-office visits is being given to the individual whose own vehicle is used from the head office to other site locations.
- 3.8.3. Employees based at the Head Office are required to fill out the Site Visitation Tracker form (HR-F41), which keeps track of the number of times the employee used his own vehicle to travel on work-related activities outside of the Head Office.
- 3.8.4. By the end of each month, the employees will submit this form together with their timesheet to their Department Head, who will validate the site travels and sign. The form is then forwarded to Payroll.
- 3.8.5. Payroll Officer then applies prorated amount of the QR 500 for every 26 out-of-office visits in one month.

**Note:** Transport Allowance is not a source of income and is purely on actual costs basis within the ceiling rate.

### 3.9 Schooling/Education Benefit

- 3.9.1 BCEC will pay up to a maximum 80% of the cost of schooling (based on actual invoices) per child to L1 employees every school year as schooling/education benefit. This will cover all schooling expense including registration, tuition and books for up to a maximum of 3 children between the ages of 5 and 18 years, studying locally or overseas. The money will be paid directly to the school against the invoice or to the employee against official receipts raised by the school.
- 3.9.2 For L2 category, BCEC will pay QR 25,000 of the cost of schooling per child every school year as schooling/education benefit. This will cover all schooling expense including registration, tuition and books for up to a maximum of 2 children between the ages of 5 and 18 years, studying locally. The money will be paid directly to the school against the invoice or to the employee against official receipts raised by the school.

3.9.3. Category L3, upon the Chief Executive Officer approval may also be granted schooling/education benefit, applying the same provisions required in item 3.9.1 but not to exceed QR 20,000 per child, per annum, for up to maximum 2 children between the ages of 5 and 18, studying locally.

### 3.10 Meals

3.10.1 Meals which are free of charge to employees residing at BCEC site accommodations are considered a privilege mainly to alleviate the hardships of staff at these remote areas and are not an entitled right to staff travelling and working at Doha or other site Offices.

3.10.2 Staff who are residing in Doha temporarily or permanently are not given this privilege.

3.10.3 Staff who reside at site are not eligible for compensation of their meal privilege in monetary terms when they travel or are temporarily or permanently assigned to Doha offices, unless otherwise approved by the Chief Executive Officer.

### 3.11 Mobile Telephones

3.11.1 Mobile telephones are recognized as a useful tool which improves the productivity of employees and their capacity to communicate important matters without delay. They are also very costly means of communication when used for non-essential purposes and can be abused easily if controls are not implemented and respected.

3.11.2 The Company policy on mobile telephones and mobile allowance is therefore to be strictly applied, and failure to observe the policy will be viewed as a breach of discipline.

3.11.3 The full accountability of the appropriateness and reasonableness in the amount of the mobile allowances covered in this policy are amongst the Heads of the Departments.

#### 3.11.4 Policy and Eligibility

3.11.4.1 Company mobile telephones and allowances will be issued only to staff with the direct recommendation of appropriate Head of Department and as endorsed by the Head of Human Resource.

3.11.4.2 Only staff with management responsibilities or those whose jobs require them to go to remote site areas and must frequently communicate during the working day to the office, client or management, should be considered eligible for mobile telephones or mobile allowance. More specifically, the following criteria are applied for staff to be eligible for mobile phones or allowance:

- a.) **Category (a)** - Staff with senior management responsibilities (L1 – L3 levels).
- b.) **Category (b)** - Staff who are required to perform specific security or health and safety functions at site.
- c.) **Category (c)** - Staff whose jobs require them to go to sites and field and/or undertake frequent out-of-offices duties, where there is no access to a landline.
- d.) **Category (d)** – Staff who are required to be on call.

3.11.4.3 Overseas dialling on mobile and roaming facilities are restricted to first-line executives only (L1 & L2 levels).

3.11.4.4 Eligible staff as per categories (a-d) above, will be allocated a mobile allowance as per limits referred to item 3.12.2 on next page of this procedure, through payroll system as “Additional Mobile Allowance” reason code, and excess calls per month will be charged to the user.

- 3.11.4.5 Exception to the above are the Chief Executive Officer and First Line Managers (L1 and L2 levels) who, will be eligible to Company post paid sim cards (Company Telecom Provider billings). Transport officers in certain cases also be eligible for post paid sim cards, in view of the nature of their jobs.
- 3.11.4.6 The Head of Human Resource will pre-approve any requests made by the Department Managers for sim cards (covered by a Company Telecom Provider billings) or mobile allowance (not covered by Company Telecom Provider billings), which will then be issued through the Head of Human Resource. Mobile Allowance/Sim Card Request Form (HR-F22) will be issued.
- 3.11.4.7 The request should specify the number of post paid sim cards or mobile allowances required and itemize the names and positions of the employees.
- 3.11.4.8 Once the post paid sim card is received, the phone number, Company Telecom Provider account number, PIN and PUK numbers must be recorded by the Head of Human Resource.
- 3.11.4.9 Pre-paid sim cards and allocation of Hala cards will no longer be used.

### 3.12 Mobile Allowance

- 3.12.1 Employees must return a work-related phone call(s) within 45 minutes at all times, otherwise, he shall lose his entitlement for a mobile phone allowance or it will be forfeited for that particular month of occurrence.
- 3.12.2 Allowances for approval and for budgeting purposes will be as per grade level and indicated as follows:
- |           |  |
|-----------|--|
| a.) L1    | Post paid (Company Telecom Provider billing) |
| b.) L2    | Post paid (Company Telecom Provider billing) |
| c.) L3    | QR 250 per month                             |
| d.) L4    | QR 150 per month                             |
| e.) L5-L6 | QR 100 per month                             |
| f.) L7-L8 | QR 50 per month                              |

### 3.12.3 Procedure

- 3.12.3.1 Prior to any request for mobile allowances or sim cards, Heads of the Departments are to ensure that there is a genuine business need for mobile allowance for their staff. In all cases, the annual budget plan from each Department for use of mobile allowance must be completed by the Heads of the Departments and approved by the Chief Executive Officer. The budget must specify the position and work location of the person requiring the mobile phone or allowance, the duration of the need for the mobile phone or allowance, the amount of mobile phones, sim cards, allowance required, and their respective justifications.
- 3.12.3.2 Once the budget is approved, the submission of the Mobile Allowance/Sim Card Request Form (HR-F22), which is attached on a case by case basis for payroll and accounting purposes, are for system approval only. The form shall include staff whose mobile allowances have been approved under the pre-approved budget and is required to have the signatures of the Head of the Department, the Head of Human Resource, and the CEO.



### **3.13 Site Offices**

- 3.13.1 BCEC Site Offices will have a stock of mobile devices and sim cards as per budget plan and allocation for on-call rotations, etc., to be charged to projects. Receipt of Mobile equipment (HR-F26) needs to be pre-filled by the recipient. These mobiles are to be used by engineers, technicians, and other site staff who are working at site on temporary projects and who do not have access to landlines while working on the project. The Head of Human Resource will designate a staff at site to be fully responsible for tracking these devices.
- 3.13.2 All users of site company mobiles are personally responsible for the care and security of the unit. This responsibility ceases only upon issuance of a return receipt signed by the Head of the Department and the Head of Human Resource.
- 3.13.3 Users who are reassigned to positions where mobiles are not required must return the equipment in good order to the Head of Human Resource or the respective designated officer and obtain a return receipt (Receipt for return of Mobile phone/sim card HR-F26).
- 3.13.4 No user is authorized to hand over his issued mobile to another staff. The correct procedures are to return the mobile and allow the concerned manager to reissue it as necessary. Proper return receipt documentation must be completed.
- 3.13.5 The mobile phone must be returned to the user's manager and its receipt noted on the departure clearance document before going on leave or vacation.
- 3.13.6 In the event that the staff is leaving the company's employment, final settlement will be made only upon return of the equipment in good order and after reconciliation of the final billings, if applicable.
- 3.13.7 The telephone should never be left visible in a vehicle or unattended in an office.
- 3.13.8 Replacement of a unit will be at the discretion of the CEO, subject to the unit having fully depreciated or inoperable or irreparable.
- 3.13.9 Theft or loss of the unit has to be reported immediately. Loss of or damage on the unit will be charged to the user if it resulted from carelessness.

### **3.14 Medical Care & Health Card / Medical Insurance Benefits**

#### **3.14.1 Health Card Benefits**

The Company provides all its employees with medical and hospitalization benefits coverage (both out-patient and in-patient medical consultations) through the Government issued Health Card which is essential when seeking medical services in local Health Centers and Hospital of Hamad Medical Center.

#### **3.14.2 Medical Insurance Benefits**

Senior Managers (categories L1 & L2) are covered with a comprehensive Medical Insurance benefits, accident and life insurance.

## Article 4

### 4.0 PAYROLL PROCESSING

#### 4.1 POLICY

- 4.1.1 All staff will be paid their monthly salary during end of month of the Gregorian calendar. The salaries and other entitlements (allowances) due to the employees are paid in Qatari Riyals. Each pay slip will include earnings for all work performance through the end of the previous payroll period.
- 4.1.2 The HR Department is primarily responsible for maintaining the employee master data for all management and employees, which contains at a minimum, the following details for each employee and the payroll module in which the designated Payroll Staff can have a copy of the master data but no access to modify it.
- 4.1.3 Any updates to the employee master database regarding the following personnel information will be done only by the designated HR Department staff:
- Personal information (employee name, employee number, address, gender date of birth, qualifications and experience.)
  - Compensation information – grade, basic salary, details of allowances, and entitlements including if on single or family status and tickets
  - Organizational information – department and reporting responsibility.
- 4.1.4 If the salary has to be calculated for less than a month, the following formula shall be used (computed on a pro-rata basis):
- $$\text{Part monthly salary} = \frac{\text{Monthly salary} \times (\text{No. of calendar days worked})}{\text{Total No. of working days in the month}}$$
- 4.1.5 All information related to salary calculation, i.e. deductions or additions and all payroll time sheets and any variations including change in employee status such as marriage, etc. which impact payroll entitlements should be sent to the HR & Payroll Unit before the 20<sup>th</sup> of the month.
- 4.1.6 The system generated Payroll Report including details on salary payments, additions and deductions for the month are generated and checked by the designated HR & Payroll staff, reviewed and approved by General Manager of Finance by last week of every month.
- 4.1.7 Payments should be initiated by the Finance Department to the employee's designated local bank account by the end of the month.
- 4.1.8 The pay slips containing summary information related to salary calculation are distributed by the designated Payroll staff.
- 4.1.9 BCEC will take all reasonable steps to ensure that employees receive the correct amount of pay in each payroll period and that employees are paid promptly on the scheduled payroll.
- 4.1.10 In the unlikely event that there was an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of the Head of Human Resource for resolving the matter.
- 4.1.11 The Payroll master data file will be signed by the General Manager of Finance on a monthly basis. Immediately prior to the due date of the payroll, any changes to the Payroll master data file, such as addition of a new employee, will require the file to be signed by the CEO.

## 4.2 Full and Final Settlement

- 4.2.1 The HR Department and the designated payroll staff are responsible for recording the accrual of all employee related liabilities such as payroll and leave and end of service benefits.
- 4.2.2 A final settlement showing all the amounts due to and from the employee is prepared by the HR Department fourteen days prior to the last day of departure.

## Article 5

### 5.0 OFFICIAL BUSINESS TRAVEL

The cost of business travel is a major operating expense of the Company. Business travel should be limited to those situations where no other means can attain the basic objective of the proposed travel.

#### 5.1 General

- 5.1.1 It is BCEC's policy to ensure that all employees are afforded a satisfactory class of travel consistent with carrying out their business objectives and to take reasonable steps to ensure their safety at all times.
- 5.1.2 The use of vacation credits in conjunction with business travel often causes the need and purpose of the business travel to become suspect. It is therefore the company's policy not to encourage the use of vacation credits in connection with business travel.
- 5.1.3 All business travel (i.e. employees traveling on BCEC's official business outside Qatar) and training travel (i.e. employees traveling on a training mission or for attending a course outside Qatar) must be approved by the respective Department Head at least seven (7) days in advance by completing the "Business Travel Request Form" (HR-F11), so that any questions regarding the travel may be resolved in a timely manner.
- 5.1.4 Any requesting personnel or department shall complete and provide clearly the required information and details in the "Business Travel Request Form" (HR-F11) – Aside from employee's data, enter the destinations and dates preferred/scheduled. Airline and flight preferences are subject to amendment to achieve best fares and most direct routing. Class of travel will be in accordance with company policy and employee entitlement. When an exception is requested a detailed justification is to be attached to this form. (Other provisions on Class of Travel is mentioned in the next Section 5.2 of this Article).
- 5.1.5 The completed "Business Travel Request Form" (HR-F11) shall be signed and approved by the concerned Department Manager before submission to HR Department.
- 5.1.6 The HR Department is responsible for the management of all approved travel requests and control of the associated trip expenses including ticketing and arrangement or coordination for hotel bookings/reservations which are approved by the Department Head or appropriate reporting authority.
- 5.1.7 The Head of Human Resource checks and verifies the entries in the request form as well as the attachments (if any). If no other comments or remarks shall approve and signed off the request form and forward same to Cost Control Department for costing and to enter the assigned cost code in both air fare and hotel reservation in the request form. This process is being implemented to facilitate the easy tracking of all transactions.



- 5.1.8 Once the costing details have been completed, the Cost Control Manager shall approve and sign the request form before sending it to CEO for approval/signature. The CEO also sign off all international assignments/travels.
- 5.1.9 No more than two Department Heads are to travel on the same flights unless authorized by the Chief Executive Officer (CEO).
- 5.1.10 All travel expenses advance are collected from Finance Department upon completion of the "Business Travel Request Form" (HR-F11) and approval signatures of the concerned Department Head, as well as required authorities and endorsement of the CEO. Note that the CEO will sign off all international assignments/travels.
- 5.1.11 BCEC shall pay an unaccountable Daily Allowance (per Diem) in advance based on the employee's grade and travel destination to cover food, local transportation, and local telephone calls. Other expenses such as lodging (Hotel), long distance business calls, fax and travel between cities are authorized expenses and itemized receipts must be produced. Hotel grades shall not exceed those specified in Table 3.1 which is considered the maximum ceiling limit for each Level. The employee will be reimbursed at the actual costs incurred and if an advance was taken then the employees must refund the advance by the appropriate amount as per receipts.
- 5.1.12 HR Department is responsible for the management of all approved travel arrangements (e.g. Employee's free passages, business/training travels, hotel accommodations, etc).
- 5.1.13 HR Department is responsible for ensuring that all employees traveling on business are provided with appropriate travel and medical insurance coverage during their overseas stay.
- 5.1.14 Exit permit shall also be obtained from the Immigration section of Administration Department by the travelling employees prior to departure date.
- 5.2 Class of Travel**
- 5.2.1 The class of travel for business related official travel shall be Business Class for Managers (Grade L1 and L2), and Economy Class for all other staff unless stated otherwise in individual Employment Contracts.
- 5.2.2 In the absence of Business Class travels, L1 and L2 levels may be granted upgrade to 1<sup>st</sup> class travels to GCC countries only. However, travels to non-GCC countries, where there is no Business Class available, L1 and L2 levels shall travel via Economy.
- 5.2.3 Employees may elect to travel for business purposes at an airfare classification, and/or by a route other than the ones authorized by BCEC. However, BCEC shall limit the airfare payment to the authorized rate and classification to which the employee is eligible. If an employee requests a lower travel classification than is authorized by this policy, there will be no payment or credit to the requesting employee for the cost difference. The intention is that employees shall neither gain nor lose through having to travel for the Company.
- 5.3 Daily Allowance (Per Diem) and hotel (lodging)**
- 5.3.1 Employees or eligible personnel on BCEC business outside Qatar for one or more nights shall be entitled to receive a Daily Allowance (Per Diem) based on their grade/management level and country/destination of travel.



5.3.2 The applicable Daily Allowance rates and the maximum ceiling limit of standard hotel room per grade are as follows:

Table 5.3

GRADE	HOTEL STANDARD ROOM ONLY*	EUROPE PER DIEM QR*	FAR EAST PER DIEM QR	GCC PER DIEM QR	USA PER DIEM QR	S. AMERICA PER DIEM QR	OTHER COUNTRIES PER DIEM QR
L1	5 Star	700	500	600	500	500	500
L2		600	400	500	400	400	400
L3	4 Star	275	275	275	275	275	275
L4							
L5	3-4Star	250	250	250	250	250	250
L6	3 Star	200	200	200	200	200	200
L7	2 Star	150	150	150	150	150	150
L8							

5.3.3 The Daily Allowances cover all expenses incurred by an employee including, meals, local transportation at place of assignment, laundry, local telephone expenses.

5.3.4 The number of days for which Daily Allowances shall be paid will be based on travel by the most direct route to enable the employee to arrive at the location of business in a timely manner. BCEC shall not pay Daily Allowances for additional days which result from the employee electing to travel by other than the most direct route or by the employees, for personal reasons, delaying their journey.

5.3.5 Travel time will begin one hour prior to the employee's scheduled departure from Qatar and end one hour after their scheduled arrival.

5.3.6 An advance payment of Daily Allowances is made based upon the estimated duration of a business travel or training need. Any adjustments/recoveries shall be made upon the employee's return to work.

- End of this Chapter-

## RECRUITMENT, SELECTION AND EMPLOYMENT

Black Cat Engineering & Construction, W.L.L. (BCEC) aims to use a variety of efficient, cost-effective, fair and consistent employee recruitment and selection methods, which maximize the chances of selections being made and attract qualified applicants to fill vacant positions in accordance with the approved manpower plan and organization structure and in turn attract and select the most suitable candidates that match specific job requirements.

### Key Processes

The following are the key processes identified in this Chapter:

- 1) Article 1 – Initiating Recruitment
- 2) Article 2 – Advertising Vacancies
- 3) Article 3 – Screening, Interviewing and Selection
- 4) Article 4 – Internal Application and Hiring
- 5) Article 5 – Appointment
- 6) Article 6 – Employment Contract
- 7) Article 7 – Orientation/Induction
- 8) Article 8 – Probationary Period
- 9) Article 9 – Confirmation of Employment
- 10) Article 10 – Hiring of OJT Trainees

### Article 1

#### 1.0 INITIATING RECRUITMENT

#### 1.1 POLICY

- 1.1.1 BCEC is committed to hiring and retaining qualified and competent staff who have the potential for effective and efficient performance of their duties and responsibilities, in accordance with Company's strategic direction.
- 1.1.2 BCEC shall not employ persons below 18 years of age.
- 1.1.3 BCEC aims at finding the right person for the right job, at the right time through effective recruitment.
- 1.1.4 BCEC provides equal opportunity to all and does not discriminate in employment, promotion, wages, benefits and trainings on the basis of race, religion, color, national origin, marital status, sex, sexual orientation, disability or age (except under 18 years of age). The only basis of decision is the ability to contribute to the Company.
- 1.1.5 Recruiting and hiring are to be conducted only as authorized by duly approved Manpower Requisition Form (HR-F1). An approved Manpower Requisition is required to fill position vacancies created by resignation, termination, transfer and increase in manpower requirement.
- 1.1.6 The concerned Department Head should submit a "Manpower Requisition" (HR-F1) Form to the HR Department at least six months prior to the actual required date or when a vacancy becomes available.
- 1.1.7 Manpower requests are communicated to Human Resources – Recruitment Department. Those requests that are initiated by the Project Sites or Work Shops shall be communicated to Human Resources – Recruitment Department through Central Planning, however those requests that are initiated by the **Head-Office's (HO) Department Heads** shall be communicated directly to the Human Resources Department – Recruitment.

 <b>HEALTH RISK ASSESSMENT</b> (HRA) <b>QSGTL Contract, Qatar</b>	CONTRACTOR JOB NO: 200020		CONTRACTOR CONTRACT NO: CW394727	
	DATE:	16-Feb-21		
	REF: Health Risk Assessment -01 P-810201 - CO ANALYZER			

HRA CONDUCTED BY: HSEQ Department, BCEC      Project Name: Multi-disciplinary Construction Call-off Contract, Shell Project Number:- 90592372

**Assessment Process:** This assessment has been completed with reference to the following documents published by International Associations of Oil & Gas Producers, International Petroleum Industry Environmental Conservation Association:

- "A Guide to Health Impact Assessments in the Oil & Gas Industry"
- "A Roadmap to Health Risk Assessment in the Oil & Gas industry"
- "Managing Health for Field Operations in Oil & Gas Activities"

Health information relation to Qatar was obtained from the following documents published by the Supreme Council of Health, State of Qatar

- Qatar Health Report 2009, Published July 2011
- Supreme Council of Health Annual Report 2012

Health information from Black Cat Engineering & Construction experience was also referred to when considering risk assessment.

The health risks for this project have been assessed using the matrix below where axes representing consequence based on increasing severity from 1 to 5 (Change to 0 to 5, refer to the QSGTL RAM matrix) and probability of occurrence based on previous experience from similar projects. It has been shown that applying there are difficulties in applying this matrix for all health issues.

Where possible the effects of exposure outside work activities has also been considered for example for psychosocial hazards that apply to expat workforce being in camps and away from families.

**Mitigation Options:** These take into account established procedures and inspection programs and statutory requirements.

Adverse exposure to health hazards is in accordance with the hierarchy of control: Elimination, Substitution, Modification, Containment, Isolation, Procedures, Education & Training, Personal protective equipment - the controls other than elimination of the hazard may include more than one mitigation approach.

**Health Hazard Identification** has taken into account the following:

- Effect that time period of exposure, Level of exposure, Mode of exposure, Individual susceptibility and Characteristics of the causal agent has on the realization of harm either acute, delayed or chronic
- Geographical location
- Physical, Chemical, Biological, Psychosocial Agents
- Workplace, Activities, Equipment & materials, Environment
- Accommodation, Food

*Note: Occupational health hazards associated with the tasks for the project have also been assessed during preparation of Hazard Identification & Risk assessment, Job Safety Analysis and Work Method Statements*

SEVERITY	CONSEQUENCES				INCREASING LIKELIHOOD				
	Public	Affect	Community	Environment	A	B	C	D	E
					Never heard of in the industry	Has happened in the industry	Has happened in the Organisation or more than once per year in the Organisation	Has happened at the Location or more than once per year at the Location	Has happened more than once per year at the Location
0	No injury or health effect	No damage	No effect	No effect					
1	Slight injury or health effect	Slight damage	Slight effect	Slight effect					
2	Minor injury or health effect	Minor damage	Minor effect	Minor effect					
3	Major injury or health effect	Moderate damage	Moderate effect	Moderate effect					
4	STD or up to 3 fatalities	Major damage	Major effect	Major effect					
5	More than 3 fatalities	Massive damage	Massive effect	Massive effect					

Sr. No.	HAZARDS	"AT RISK"	SEV.	PROB.	RISK	MITIGATION / CONTROL MEASURES	PROB.	SEV.	RES RISK	Comments
<b>Camp Accommodation</b>										
1	Food Safety and contamination of food	Personal health Camp population health	3	C	Medium	Hygiene requirements in kitchens are enforced Storage requirements for food are enforced Food supplied by reputable contractors Inspection of kitchens are conducted Samples of food are kept for later analysis should contamination be suspected. Local authorities investigate outbreaks of food poisoning Medical reassessment of personnel recovered from contagious disease prior to return to work. Hand washing facilities provided at entry to mess hall Personal hygiene programs	2	B	Low	Food poisoning outbreaks due to spoiled food have been known to occur. Local authorities implement measures to reinforce requirements.
2	Contagious diseases: - Chicken Pox - Tuberculosis	Personal health Camp population health	3	C	Medium	Pre-employment screening for TB in accordance with Qatar medical Availability of medical facilities Early identification of symptoms and isolation of affected person(s) with medical treatment Assessment of people that affected person may have been in contact with. International outbreaks of contagious diseases are monitored by government departments and communicated to companies / medical professionals in Qatar.	2	B	Low	TB and chicken pox have both required isolation measures to be implemented in camps. Instances have occurred when infected workers have returned from leave. In each instance prompt response has prevented others being infected.

Sr. No.	HAZARDS	"AT RISK"	SEV.	PROB.	RISK	MITIGATION / CONTROL MEASURES	PROB.	SEV.	RES RISK	Comments
3	Acute intestinal infections including hepatitis A	Personal health Camp population health	3	B	Low	Personal hygiene program Treatment and monitoring of drinking water Camp cleaning program for ablution facilities and accommodation. Inspection program to ensure cleanliness of dining and ablution facilities. Availability of medical facilities for prompt identification and treatment.	2	B	Low	<i>Prompt attention and focus on personal hygiene has prevented spread.</i>
4	Fungal diseases	Personal health Camp population health	3	C	Medium	Personal hygiene program Camp cleaning program for ablution facilities and accommodation Availability of medical facilities for prompt identification and treatment. Laundering of clothing, bedding and towels	2	B	Low	<i>Fungal infections usually on feet - medical treatment before these infections become infected.</i>
5	Acute respiratory infections	Personal health Camp population health	3	C	Medium	Awareness of seasonal outbreaks Consider implementing immunization program in accordance with medical assessment and advice Roll out awareness precautions to be taken during dusty weather conditions. Personal hygiene program Fresh air into accommodation	2	B	Low	<i>Seasonal outbreaks of URTI occur and treated via medication. Prevention of spread is difficult but person hygiene programs have had some effect.</i>
6	Air emissions - smokers Exposure to non-smokers	Personal health Camp population health	3	B	Low	Smoking policy Specific smoking shelters in open air and away from accommodation	2	B	Low	<i>Smoking cessation encouraged but despite government and company programs to highlight the adverse health effects smoking continues for a percentage of the workforce.</i>
7	Psychosocial effects that may occur due to: - Expat workers away from families - Differences between cultures - Harassment - Lack of leisure and recreation opportunities	Personal health	3	C	Medium	Provision / availability of family contact through internet Provision of recreational activities in the camp with organized events Availability of facilities to cater for cultural beliefs for different nationalities in the camp including food choices Violence and harassment reporting / action program Compliance with annual leave requirements and consideration for emergency leave Compliance with safe hours of work procedures Bus provided for workers going to shopping malls on Fridays. Employee should be aware on the Mental Health awareness drive	2	B	Low	<i>Awareness of the effects that being away from family is realized and there is support from various nationalities to assist new employees to adjust. Provision of internet access helps. Prompt response to address harassment and to ensure each employee is aware of support structure also helps.</i>
8	Allergies or Insect Infestation effects	Personal health	3	C	Medium	Knowledge of people suffering from food related allergies Regular pest control in camp facilities. Laundry cleaning of bedding Prompt treatment of any infestation in an appropriate manner.	2	B	Low	<i>No instances of food allergies. Some cases of allergies to insect bites / stings have occurred and following treatment these individuals are identified as potential for anaphylaxis</i>
<b>Transportation</b>										

Sr. No.	HAZARDS	"AT RISK"	SEV.	PROB.	RISK	MITIGATION / CONTROL MEASURES	PROB.	SEV.	RES RISK	Comments
9	Traffic Accidents - Road traffic accidents are a common occurrence on public roads	Work team Management Team Visitors	3	B	Medium	Work team is accommodated in camps in RLIC and buses to and from the work site. Drivers are trained in defensive driving techniques IVMS fitted to vehicles and data is analyzed to feedback to drivers Road Transport Management Plan in place - Vehicle inspection program - Route selection - Planned road trips - Driving hours to address fatigue - QSGTL Guidelines when driving in fog. - Compliance with QSGTL Life Saving Rules such as no ever speeding, no use of mobile while driving, no drinking of alcohol, wearing of seatbelt and follow Journey Management Plan Focus by government agencies to improve road safety - increase in enforcement, development of road infrastructure and improved public transport. Hospital facilities and emergency response is good.	2	B	Low	<i>Injuries have occurred in the company due to road traffic accidents - most accidents occur at low speed and result in only property damage. Road safety and driving programs has resulted in significant reduction in accidents.</i>
10	Injury during Transport	Work team Management Team Visitors	3	B	Medium	Defensive driver program Seat belts worn by all vehicle occupants No materials / tools / equipment carried in passenger compartments Safety Awareness Follow speed limit and do not use mobile phone while driving. Follow approved Journey management Plan Pedestrian / vehicle interface during pick-up and drop off controlled Focus by government agencies to raise awareness of pedestrian safety. First aid kits provided in vehicles Emergency response available.	2	B	Low	<i>Injuries have occurred in the company due to road traffic accidents - most accidents occur at low speed and result in only property damage. Road safety and driving programs has resulted in significant reduction in accidents.</i>
11	Vehicle Breakdown - ambient temperature extremes	Work team Management Team Visitors	3	C	Medium	Transport Management Plan - expected arrival time known and contact made if this is overdue and no update is made by driver. Mobile phone coverage in Qatar is good and allows driver to contact office to arrange recovery. Response to break down is less than an hour. Water in vehicle to ensure hydration is maintained. Regular vehicle maintenance and thorough vehicle inspection on a daily basis.	2	B	Low	<i>Vehicle inspection programs and wide mobile phone coverage in Qatar limits the time a person will be stranded.</i>
<b>Project Activities</b>										
12	Noise levels exceed 85dB(A) Hearing Loss	Work Team	3	B	Medium	Noise levels are known and appropriate signage is in place to designate areas with noise > 85dB(A) Site requirement to have hearing protection when working in areas designated as high noise Equipment & tools maintained in good condition and noise abatement measures in place Procedure for pneumatic tools requires use of hearing protection Compliance monitoring through workplace inspections Hearing conservation program Employee health monitoring program	2	B	Low	<i>Hearing loss for those involved in noisy tasks is recognized. Hearing protection programs in place - difficult to reinforce behaviors with not only those using noisy tools but also those in the adjacent areas. Audiometry testing in place.</i>

Sr. No.	HAZARDS	"AT RISK"	SEV.	PROB.	RISK	MITIGATION / CONTROL MEASURES	PROB.	SEV.	RES RISK	Comments
13	Welding - Exposure to Fumes (Reparatory, CNS effects) - Exposure to UV light (Eyes)	Welders Others accessing area	3	C	Medium	Welding activities shielded Extraction ensure sufficient ventilation are in place to remove fumes Welders wearing appropriate PPE for task Monitor and schedule the rest-work cycle to avoid long exposure to fumes. Personal hygiene - washing hands before eating / drinking to reduce possible ingestion of harmful substances Medical checks - spirometry Follow-up of medical clinic visits	2	B	Low	<i>Effects are know to those involved in the tasks. Further awareness and monitoring required.</i>
14	Use of pneumatic hand tools - Vibration white finger - Noise - Pressure	Work team	3	B	Low	Pneumatic tools in good condition - hand grips, noise attenuation. Whiplash arrestors installed on hose connections. Work team aware of effects from use of vibrating tools and trained to operate. Work / rest program when using equipment. 15 minutes duration for the use of jackhammer. PPE- use of impact gloves to reduce likely onset of vibration related effects. PPE- Hearing protection	2	B	Low	<i>Effects are know to those involved in the tasks. Further awareness and monitoring required. Total duration of using jackhammer per shift of every operator shall not exceed 2 hours</i>
15	Ablution facilities - Health effects from poor personal hygiene	Personal health	3	C	Medium	Well maintained facilities Signage indicating need for hand washing / drying No spitting	2	B	Low	
16	Exposure to hazardous chemicals - Paint / solvents and Exposure to hot surface at site .	Work team Management Team Visitors	3	C	Medium	Materials stored in appropriate ventilated area MSDS available for all materials All containers clearly labelled. Health hazards from use of materials and controls to reduce / eliminate exposure known to work team Spill response & Waste disposal procedures in place and complied with. Use of the proper PPE when handling chemicals. Identify the hot line's / surface at the work location . Provide temporary barrication and sign to warn the employees	2	B	Low	<i>Education required on health effects, storage and disposal. Avoiding contact - respiratory, skin</i>
17	Ergonomic effects - Display Screens - Manual handling	Work team Management Team Visitors	3	B	Low	Minimize awkward positions by adjusting the chair to support the body. Avoid continuous sitting by taking regular breaks stand/walk occasionally. Minimize repetitive motions by varying the task and location, Manual handling requirements addressed during inductions Use of mechanical means to move materials where possible Reporting system to enable early intervention of observed health effects	2	B	Low	

Sr. No.	HAZARDS	"AT RISK"	SEV.	PROB.	RISK	MITIGATION / CONTROL MEASURES	PROB.	SEV.	RES RISK	Comments
18	Personal health issues that may result in accident affecting themselves or others	Work team Management Team Visitors	3	B	Low	Health surveillance testing - fitness for work program - specific health checks for critical activities: drivers, crane operators, persons working at height. Pre-employment medical Transmittable diseases check during application for resident permit by government agency. All Employee should be involved and aware on the Mental Health drive.	2	B	Low	
19	Exposure to Extreme weather conditions ( cold/winter weather )	Work team Management Team Visitors	3	D	Medium	Wet weather / could weather prevention program (monitor ahead upcoming weather through approved weather bureu) Providing thermal inners for all the employee Considering to avoid working on extreme weather condition , Rain , sand storm heavy wind or fog. Emergency response procedures	2	B	Low	<i>Effects are know to those involved in the tasks. Further awareness and monitoring required.</i>
20	Snakes, Scorpions, Spiders, Rodents, Insects	Work team Management Team Visitors	3	B	Medium	Inspect assigned area prior to start work. Keep away from bushes unless confirmed clear of these animals. Do not attempt to kill these animals but let them move away. Use rod or stick for inspection. Materials in the area have been removed allowing any animals that were there to leave the area. Wear prescribed PPE	2	B	Low	
21	Exposure to ionizing radiation during NDT	Work team	3	C	Medium	1. Source container must be approved by SCENER. 2. Client's representative shall be notified and permission shall be granted prior to bringing of radiation source in and around plant premises. 3. The vehicle carrying radiation source/personnel shall have SCENER approval and certified by Q shell representative. 4. Calibrated Radiation survey instrument shall be used to measure the radiation level prior to fix the barricade. 5. Barricade the area with RADIOGRAPHY IN PROGRESS sign in the entrance and exit ways of radiation limit and the same shall be blocked during radiography. 6. Warning light shall be provided. 7. If possible do radiography in the off timing. 8. Evacuate personnel from radiation affected zone and deploy NDT team only on permitted zone. 9. Technicians shall be provided with TLD badge, pocket dosimeter and calibrated survey meter.	2	B	Low	

Sr. No.	HAZARDS	"AT RISK"	SEV.	PROB.	RISK	MITIGATION / CONTROL MEASURES	PROB.	SEV.	RES RISK	Comments
22	COVID-19	Work team Management Team Visitors	4	D	High	Social distancing keep personal hygiene . Wash your hand for 20 sec. Use face mask at all the time Cover your nose and mouth while cough or sneeze. Avoid close contact and hand shake. Avoid traveling to wildly spread country's . follow the instruction by MOI & Shell Thermal scan to monitor body temperature. Communicate the resent update(MOI) with all . Report any kind health issues to site admin ASAP and seek medical assistance Maintain social distancing at rest shelters	2	B	Low	<i>Prompt attention and focus on personal hygiene has prevented spread of virus.</i>
23	Heat stress	Work team and others exposing to summer weather conditions	3	C	Medium	1.Rest shelters provided work location. 2.Forced cool air ventilation into the pits / work area if required to enable air flow during work activity 3.Shade over work locations where possible/ Air-conditioned work shelters. 4.Strict application of the work / rest regime. 5.Ensure Buddy System. 6.Follow Heat stress managment plan. 7.prevention and Awarness on Heat stress and prevention of heat related illness. 8.Measuring, Recording, Communicating, and posting of Heat Index at location 9.No work will be undertaken during "Black Flag (QSGTL) conditions unless it is a critical activity, has been subjected to risk assessment and mitigations are implemented to avoid any heat related illness or accident due to heat stress conditions and all activity will stop if HI reach more than or equal 60	2	B	Low	

# ENVIRONMENT

Black Cat will ensure through its decisions and activities to have the proper approach the environment by:

- Using resources in sustainable manner.
- Mitigating and adapting to climate change.
- Contributing to the carbon footprint reduction.
- Preventing pollution.
- Encouraging the development and diffusion of environmentally friendly technologies.



# ENVIRONMENT initiatives

## includes, but not limited to:

- Black Cat is an ISO 14001-2015 certified company dedicated for the compliance of Environmental Management System.
- Black Cat provides awareness trainings on Energy and resource conservations among all employees through trainings, routine topics, etc.
- Black Cat mark international days and encourage employees to participate (Earth Hour, World Water Day, International Plastic Bag Free Day and etc.)
- Environment aspect and impact register developed to identify environmental aspect which are associated with the activities and to take adequate precautionary measures
- Waste segregation programs implemented at all projects to make sure the waste are segregated at the source and disposed off properly
- Black Cat conduct monthly environment drive at all projects, a mass house keeping program involving project senior management team



# ENVIRONMENT initiatives

## includes, but not limited to:

- Several actions being implemented in offices to conserve energy and resources such as;
  - Installing lights and water taps with auto-off sensors
  - Reduction of paper consumption is being implemented through 2 sided printing using ID system
- Black Cat Register one of our projects (Dukhan Production Facilities Upgrade) into United Nations Water HUB (<https://wateractionhub.org/organizations/1234/d/black-cat-engineering-construction-wll/>)
- Black Cat Environment services is a partnership with OIL SPILL EATER INTERNATIONAL II (OSEI) to provide a solution for treatment of oils spills, crude oil sludge and remediate any contaminated land and water from hydrocarbon contamination.
- Black Cat participated in 1 Million Tree Planting Campaign from Ministry of Interior Qatar (MOI)
- Emergency Procedures are implemented to address accident/incidents affecting the environment and human health, Emergency Mock Drills on Spill preventions are being



BCEC  
LIFE  
SAVING  
RULES



"Always be mindful of the life saving rules"

Positive Indicators	Numbers
Number of Good days (Since last TRI)	273 DAYS
Workplace Inspections	2,176
ZHO Card	6,949
Man-hours Worked	3,165,478
Risk Assessments/ PTW	9,607

**THOUGHT FOR THE DAY**

Sometimes we are tested not to show our weaknesses, but to discover our strengths.

**INCIDENTS REPORTED THIS WEEK**

None to report 😊

**RECOGNITION**

Well done to all for your continued excellent safety performance

**TOPIC – AWARENESS OF FOOD LOSS & WASTE**

29<sup>th</sup> September is marked as **International Day of Awareness of Food Loss and Waste** which focus on achieving one of the Sustainable Development Goals (SDGs), **Goal 2 – ZERO HUNGER**

Reducing food losses and waste is essential in a world where the number of people effected by hunger. When food is loss or wasted, all the resources that we used to produce this food- including water, land, energy, labour and capital go to waste. Also, disposal of food waste in landfills leads to Greenhouse gas emissions, contributing to climate change.

- There is no room for food loss and waste in this time of crisis. COVID-19 is a wake-up call to rethink the way in which we produce, handle and waste our food.
- Reducing food losses and waste provides a powerful means to strengthen our food system.
- We should all be food savers.



Take action, start something. Stop food loss and waste.  
For the people. For the planet. "We are all responsible"

BCEC  
LIFE  
SAVING  
RULES



"Always be mindful of the life saving rules"

POSITIVE INDICATORS	NUMBERS
<b>Number of Good days</b> <small>(Since last TRI)</small>	172 DAYS
<b>Number of perfect days</b> <small>(Year to Date)</small>	107 DAYS
<b>Workplace Inspections</b>	1,738
<b>ZHO Card</b>	1,436
<b>Man-hours Worked</b>	1,054,403

**THOUGHT FOR THE DAY**

"It's not whether you get knocked down, It's whether you get up"

**INCIDENTS REPORTED THIS WEEK**

None to report 😊

**RECOGNITION**

Well done to all for your continued excellent safety performance

**TOPIC – EARTH DAY**

**22<sup>nd</sup> APRIL – INTERNATIONAL MOTHER EARTH DAY**



This day is celebrated to spread the awareness among people for Earth's wellbeing and to encourage people to support environmental protection.

The **theme** of 2021 International Mother Earth Day is **Restore Our Earth**

Our mother earth needs to be saved, as our survival depends completely on this planet. Therefore, we all shall play our part and make ample efforts to protect our Earth by avoiding all harmful activities.

*Stay home if you are sick!*

*"We are all responsible"*

BCEC  
LIFE  
SAVING  
RULES



"Always be mindful of the life saving rules"

Positive Indicators	Numbers
Number of Good days (No LTA, TRA, HPI)	41 DAYS
Workplace Inspections	5,032
Hazard Report Card raised	9,372
Man-hours Worked	1,577,645
Risk Assessments/ PTW	1263

**THOUGHT FOR THE DAY**

A POSITIVE THOUGHT IS THE SEED OF A POSITIVE RESULT  
 एक पॉज़िटिव थॉटहॉट एक पॉज़िटिव रिजल्ट का बीज है

**INCIDENTS REPORTED THIS WEEK**

Non to Report ☺

**RECOGNITION**

Recognition awards distributed at QPH projects for successful completion of project 'Cooling water hot tapping and service water shutdown at GTL-1 & 2 For BFW QMI'

**TOPIC / NOTICES –**

**JULY 3<sup>rd</sup> - INTERNATIONAL PLASTIC BAG FREE DAY**

It is about making society aware of the over-consumption of plastic bags as well as disposable products, working towards developing more responsible and more environmentally friendly habits. It promotes environmental conservation as it encourages people to reject plastic bags.



Plastic bags are one of the leading causes of pollution in the world. Each year an estimated 500 billion to 1 trillion plastic bags are consumed worldwide. It takes hundreds of years for single use plastic bags to degrade, and it kills marine life.

Single-use plastic bags threaten our environment and are very expensive to manage, once disposed of. Not only can plastic bags directly harm living organisms through entrapment and suffocation but also indirectly through bioaccumulation.

There are a lot of good ways to celebrate, and the easiest requires a simple resolution on your part. Even if just for one day, choose paper over plastic, or even better bring your own bags to the retailers to pick up your goods. Some stores even offer discounts or other perks for the customers that bring their own!

Plastic Free July is a global movement that helps people be part of the solution to plastic pollution – so we can have cleaner streets, oceans, and beautiful communities.



BCEC  
LIFE  
SAVING  
RULES



"Always be mindful of the life saving rules"

POSITIVE INDICATORS	NUMBERS
<b>Number of Good days</b> <small>(Since last TRI)</small>	137 DAYS
<b>Number of perfect days</b> <small>(Year to Date) **</small>	74 DAYS
<b>Workplace Inspections</b>	1,238
<b>ZHO Card</b>	1,113
<b>Man-hours Worked</b>	681,909

**THOUGHT FOR THE DAY**

"You always pass failure on the way to success"

**INCIDENTS REPORTED THIS WEEK**

None to report 😊

**RECOGNITION**

Well done to all for your continued excellent safety performance

**TOPIC – MENTAL HEALTH DURING COVID-19**

COVID 19 has made significant changes to our daily lives. As the whole world being in uncertainty about the COVID 19 pandemic situation, most of us are mentally stressed and worried. Even though the precautionary measures like social distancing, lock downs and quarantine are practiced to limit the spread of disease, it make us feel that we are detached or isolated from everyone and surroundings.

This stress and anxiety may lead to mental disorders. If you feel stressed, the best thing to do is to talk someone and seek help.

**Things you can do to support yourself:**

- 
Hearing about the pandemic repeatedly can be upsetting: take breaks from watching, reading, or listening to news stories and social media.
- 
Make time to unwind. Try to do some other activities you enjoy.
- 
Connect with others. Talk with people you trust about your concerns and how you are feeling.
- 
Take care of your body. Take deep breaths, stretch, or meditate. Try to eat healthy, well-balanced meals, exercise regularly and get plenty of sleep.



**Stay home if you are sick!**

**"We are all responsible"**

**BCEC LIFE SAVING RULES**

*"Always be mindful of the life saving rules"*

Positive Indicators	Numbers
Number of Good days (Since last TRI)	18 DAYS
Workplace Inspections	2,958
ZHO Card	8,554
Man-hours Worked	3,955,033
Risk Assessments/ PTW	11,109

**THOUGHT FOR THE DAY**

There is no substitute for hard work

**INCIDENTS REPORTED THIS WEEK**

None to report ☺

**RECOGNITION**

Well done to all for your continued excellent safety performance

**TOPIC – REDUCE PAPER USE**



Every office requires the use of paper and it is entirely impossible to work without using paper. Therefore, we must try to use less paper as far as it is possible for us. Not only our environment can benefit from the reduction of paper use, but we can also gain advantages, such as saving money.

**How to reduce paper consumption**

- Recheck your document once or twice to avoid any kind of mistakes, which will reduce the need to print the same documents two to three times.
- Always send an email rather than sending letters
- Use USB to transfer documents from one place to another
- Print on both sides of paper when possible
- Only print the page which need to get signed, rather than printing the whole document
- Backup documents electronically
- Conduct all internal communications online
- Reuse unwanted paper

**Reduce. Reuse. Recycle.**

Every 3000 sheets of paper costs us a **TREE**

So, Consider the impact of using paper on the Environment.

*"We are all responsible"*

BCEC  
LIFE  
SAVING  
RULES



"Always be mindful of the life saving rules"

POSITIVE INDICATORS	NUMBERS
<b>Number of Good days</b> <small>(Since last TRI)</small>	235 DAYS
<b>Number of perfect days</b> <small>(Year to Date)</small>	170 DAYS
<b>Workplace Inspections</b>	2,913
<b>ZHO Card</b>	1,991
<b>Man-hours Worked</b>	1,572,260

**THOUGHT FOR THE DAY**

"Success comes from having dreams that are bigger than your fears."

**INCIDENTS REPORTED THIS WEEK**

None to report 😊

**RECOGNITION**

Well done to all for your continued excellent safety performance

**TOPIC – ENVIRONMENT / WASTE MANAGEMENT**

# Reconsider your refuse

Help make landfill a *last resort*:

- Reduce paper use by printing double-sided and minimising the number of handouts taken to meetings ✔
- Reduce disposable cup usage by using mugs or Keep Cups ✔
- Reuse envelopes for internal mail ✔
- Recycle your waste correctly – a recent study found that **43%** of waste put in general waste bins could have been recycled ✔
- Recycle all Vegware compostable packaging, cups and cutlery in the food waste bins provided ✔

## What can you do.....?

- Be aware of the environmental impact of your daily activities at work.
- Make a conscious effort to minimize and segregate waste recycle where facilities are available .
- Reduce paper use by photocopying on both sides and reading and or archiving documents electronically.
- Make a special effort to save energy and resources. E.g. switch off equipment's when not in use ( in particular lights, computers, chargers and projectors)
- Consider reducing the environmental impact of commuting to work by car sharing or using public transport.

"We are all responsible"

	BCEC/HSE TOPIC-022/2021	Date: 24/06/2021
	<b>WEEKLY HSE TOPIC</b>	

**WEATHER FORECAST**

DAY	HIGH/LOW	DESCRIPTION	PRECIP	WIND
Fri 25	<b>41°/30°</b>	 Sunny	0%	SE 13 km/h
Sat 26	<b>42°/31°</b>	 Sunny	2%	ESE 14 km/h
Sun 27	<b>41°/31°</b>	 Sunny	2%	ESE 18 km/h
Mon 28	<b>40°/31°</b>	 Sunny	2%	ESE 17 km/h
Tue 29	<b>41°/31°</b>	 Sunny	2%	ESE 18 km/h
Wed 30	<b>42°/32°</b>	 Sunny	1%	ESE 14 km/h
Thu 01	<b>43°/32°</b>	 Sunny	1%	NE 16 km/h

[Weather.com](https://www.weather.com)

**OTHER NOTICES –**

- Maintain at least 1.5-meter distance between yourself and anyone around you.
- Avoid physical contact such as shaking hands when greeting others.
- Wear face masks always when leaving outside of the home.
- Always show your Ehteraz app status whenever requested.
- If you are sick, do not report to work.

**BUREAU VERITAS**  
Certification



## **BLACK CAT ENGINEERING & CONSTRUCTION W.L.L**

Head Office: 3<sup>rd</sup> Floor, Tornado Tower,  
West Bay,

P. O. Box: 12714, Doha

### **STATE OF QATAR**

This is a multi-site certificate, additional site(s) are listed on the next page(s)

*Bureau Veritas Certification Holding SAS – UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below*

## **ISO 9001:2015**

*Scope of certification*

**ENGINEERING, PROCUREMENT, CONSTRUCTION, ASSEMBLY, INSTALLATION, PRE-COMMISSIONING AND COMMISSIONING OF PLANTS & PIPELINES FOR THE OIL, GAS AND PETROCHEMICAL RELATED PROCESS INDUSTRY. CONSULTANCY SERVICES FOR PROJECT FEASIBILITY STUDIES, FRONT END ENGINEERING DESIGN [FEED], DETAILED ENGINEERING AND DESIGN RELATED TO PROCESS, OIL & GAS AND PETROCHEMICAL INDUSTRIES. FABRICATION OF PIPES AND STEEL STRUCTURES.**

Original cycle start date:	<b>05<sup>th</sup> July 2013</b>
Expiry date of previous cycle:	<b>04<sup>th</sup> July 2019</b>
Re-Certification audit date:	<b>22<sup>nd</sup> May 2019</b>
Re-Certification cycle start date:	<b>04<sup>th</sup> July 2019</b>

Subject to the continued satisfactory operation of the organisation's Management System, this certificate expires on: **04<sup>th</sup> July 2022**.

**Certificate No. IND 19.7508 U/QHSE-1**

Version 2, Revision date: 22<sup>nd</sup> August 2020

**Vinoth. K. P - Certification Manager**

Certification body address: **5<sup>th</sup> Floor, 66 Prescott Street, London E1 8HG, United Kingdom**

Local office: **G1-G3, Ground Floor, KG Building**

**(Bldg. No. 194, Street No. 230), C Ring Road,**

**Opposite Gulf Times, P. O. Box: 22157,**

**(Doha) Qatar**



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Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by consulting the organisation.  
To check this certificate validity please call: **+974 40329729**



**BUREAU VERITAS**  
Certification



## **BLACK CAT ENGINEERING & CONSTRUCTION W.L.L**

Head Office: 3<sup>rd</sup> Floor, Tornado Tower,  
West Bay,

P. O. Box: 12714, Doha

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## **ISO 14001:2015**

*Scope of certification*

**ENGINEERING, PROCUREMENT, CONSTRUCTION, ASSEMBLY, INSTALLATION, PRE-COMMISSIONING AND COMMISSIONING OF PLANTS & PIPELINES FOR THE OIL, GAS AND PETROCHEMICAL RELATED PROCESS INDUSTRY. CONSULTANCY SERVICES FOR PROJECT FEASIBILITY STUDIES, FRONT END ENGINEERING DESIGN [FEED], DETAILED ENGINEERING AND DESIGN RELATED TO PROCESS, OIL & GAS AND PETROCHEMICAL INDUSTRIES. FABRICATION OF PIPES AND STEEL STRUCTURES.**

Original cycle start date:	05 <sup>th</sup> July 2013
Expiry date of previous cycle:	04 <sup>th</sup> July 2019
Re-Certification audit date:	22 <sup>nd</sup> May 2019
Re-Certification cycle start date:	04 <sup>th</sup> July 2019

Subject to the continued satisfactory operation of the organisation's Management System, this certificate expires on: **04<sup>th</sup> July 2022**.

**Certificate No. IND 19.7508 U/QHSE-2**

Version 2, Revision date: 22<sup>nd</sup> August 2020

  
**Vinoth. K. P - Certification Manager**

Certification body address: 5<sup>th</sup> Floor, 66 Prescott Street, London E1 8HG, United Kingdom

Local office: G1-G3, Ground Floor, KG Building

(Bldg. No. 194, Street No. 230), C Ring Road,

Opposite Gulf Times, P. O. Box: 22157,

(Doha) Qatar



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Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by consulting the organisation. To check this certificate validity please call: **+974 40329729**



**BUREAU VERITAS**  
Certification



## **BLACK CAT ENGINEERING & CONSTRUCTION W.L.L**

Head Office: 3<sup>rd</sup> Floor, Tornado Tower,  
West Bay,  
P. O. Box: 12714, Doha

### **STATE OF QATAR**

This is a multi-site certificate, additional site(s) are listed on the next page(s)

*Bureau Veritas Certification Holding SAS – UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below*

## **ISO 45001:2018**

*Scope of certification*

**ENGINEERING, PROCUREMENT, CONSTRUCTION, ASSEMBLY, INSTALLATION, PRE-COMMISSIONING AND COMMISSIONING OF PLANTS & PIPELINES FOR THE OIL, GAS AND PETROCHEMICAL RELATED PROCESS INDUSTRY. CONSULTANCY SERVICES FOR PROJECT FEASIBILITY STUDIES, FRONT END ENGINEERING DESIGN [FEED], DETAILED ENGINEERING AND DESIGN RELATED TO PROCESS, OIL & GAS AND PETROCHEMICAL INDUSTRIES. FABRICATION OF PIPES AND STEEL STRUCTURES.**

Original cycle start date:	<b>22<sup>nd</sup> August 2020</b>
Expiry date of previous cycle:	<b>NA</b>
Certification audit date:	<b>22<sup>nd</sup> May 2019</b>
Certification cycle start date:	<b>22<sup>nd</sup> August 2020</b>

Subject to the continued satisfactory operation of the organisation's Management System, this certificate expires on: **04<sup>th</sup> July 2022.**

**Certificate No. IND 19.7508 U/QHSE-3**

Version 2, Revision date: 22<sup>nd</sup> August 2020

  
**Vinoth. K. P - Certification Manager**

Certification body address: **5<sup>th</sup> Floor, 66 Prescott Street, London E1 8HG, United Kingdom**

Local office: **G1-G3, Ground Floor, KG Building**

**(Bldg. No. 194, Street No. 230), C Ring Road,**

**Opposite Gulf Times, P. O. Box: 22157,**

**(Doha) Qatar**



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Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by consulting the organisation.  
To check this certificate validity please call: **+974 40329729**



Procedure No.: BCEC/HSE/CP/019  
Effective: 18.04.2018  
Issue Date: 11.04.2018  
Revision No.: 1

# PROCEDURE

HEALTH, SAFETY & ENVIRONMENT AND QUALITY (HSEQ)

## SAFE HANDLING OF HAZARDOUS SUBSTANCES

Page 1 of 11

SAFE HANDLING OF HAZARDOUS SUBSTANCES  
Prepared by Health, Safety & Environment and Quality (HSEQ) Department  
Approved by Chief Executive Officer

*UNCONTROLLED IF PRINTED. This copy was valid at the time it was printed.*



*Consider the Environment. Please do not print this document unless you really need to, if you need take duplex. At BCEC we support conservation.*

**REVISION HISTORY**

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
0	11.06.2011	First issue and for implementation of control procedure on Safe Handling of Hazardous Substances.	18.06.2011
1	11.04.2018	Re-issue for revalidation with the following changes: Update on Signatories; Replaced/re-named General Manager (GM) to Chief Executive Officer (CEO) and Safety to HSE or to HSEQ wherever mentioned in the whole procedure document; Revised/updated contents of the procedure to reflect changes and current process within the Company.	18.04.2018

Action	Responsible	Signature	Date
Initiated by:	J. Francis		11/04/18.
Prepared by:	D. Guinto		11/04/2018
Checked & Reviewed by:	C.E. Mercer		11/4/18
Approved by:	R. Dietz		15 APR 2018

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<b>Appendix A: Typical Safety Data Sheet (SDS) (Sample Only)</b>		



**1.0 INTERNAL CONTROLS**

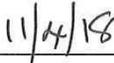
**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this HSE Procedure.

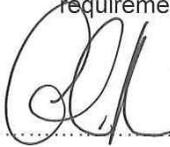
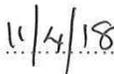
The **Health, Safety & Environment and Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

**1.2 APPROVAL**

This Procedure and any amendments made there to; require the following approvals:

Authority	Date
 HSEQ and Training Manager	 11/4/18
 Chief Executive Officer	 15 APR 2018

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed  Date 

## 2.0 SCOPE

This procedure covers all operations of **Black Cat Engineering & Construction, W.L.L. (BCEC)** where the use of chemical is involved. It applies to all employees and hired workers of BCEC who work with chemical or other hazardous substances from time to time.

## 3.0 PURPOSE

The purpose of this procedure is:

- a) To ensure that chemicals used in BCEC's operations are handled by the workforce safely and in a manner that hazards associated with chemical handling are properly controlled and managed.
- b) To make clear the entire workforce about the necessary precautions that must be taken while handling chemicals.
- d) To make workers familiar with the first aid measures that shall be taken if there is a direct contact with chemicals
- e) To ensure that all hazardous wastes are disposed in accordance with client and legal requirement

## 4.0 DEFINITIONS

- A. **Chemical:**  
Any substances in liquid, solid, or gaseous form that has the potential to cause injury upon contact with it
- B. **Hazardous Substance:**  
Any chemical found in the workplace that is capable of causing harm
- C. **Exposure:**  
The period or duration of working with or being in proximity to chemical
- D. **PPE:**  
Personal Protective Equipment is protective gears that are specifically designed to provide minimum safety to the wearers against risks associated with handling/working with chemicals.
- E. **SDS:**  
Safety Data Sheet (SDS, previously referred to as Material Safety Data Sheets (MSDS) or Chemical Safety Data Sheet (CSDS) is a document that is supplied by the manufacturer of a chemical detailing the composition of the chemical, the address of the manufacturer and guidance on how to safely transport, store handle (use) and dispose of the product.
- F. **Means of Contact:**  
This refers to the various ways through which a chemical (or any other hazardous substance) can enter and affect human body.

**G. Chemical Inventory:**

A chemical inventory is used to account for all chemical products used or stored in areas of the Plant or Installation. Chemical products are listed in alphabetical order.

The inventory identifies items for which a Safety Data Sheet (SDS) is required and is available.

The Chemical inventory is kept for each process unit, maintenance shop, product storage location/warehouse and the laboratory.

**H. Label:**

Any written, printed, or graphic information displayed on or affixed to containers or pipelines.

**5.0 RESPONSIBILITIES**

**5.1 SITE MANAGER**

- Ensure all employees have received required trainings and aware of their responsibilities
- Ensure the proper identification, assessment and control of hazardous chemical at the work place.
- Ensure that this procedure is completely implemented.
- Provide required PPE's for safe handling of hazardous substances.
- Ensure that all the hazardous substances are transported safely as recommended in SDS.
- Provide spill containment and clean up kits where hazardous substances are stored.
- Ensure that the hazardous substances are stored in accordance with the client and legal requirements or as stated in SDS.

**5.2 HSEQ DEPARTMENT**

The Health, Safety & Environment and Quality Department should:

- Maintain a copy of record of type of hazardous products (Chemical Inventory) stored in both BCEC Head Office and Site Offices.
- Train employees on appropriate work practices in the safe handling of chemicals.
- Select the appropriate PPE for employees working with chemicals.
- Ensure SDS of the chemicals are available at site.
- Establish an Emergency preparedness plan and made known to all employees.
- Carry out periodic inspections at chemical storage area and ensure all chemicals are stored safely.
- Ensure all chemical containers are disposed off as per the MoE regulations or as per client procedures.
- Ensure that all the hazardous substances are transported safely as recommended in SDS.
- Provide spill containment and clean up kits where hazardous substances are stored.
- Ensure that the hazardous substances are stored in accordance with the client and legal requirements or as stated in SDS.

### 5.3 WAREHOUSE / STORES

The Warehouse and/or Stores department should:

- Check all chemical products received have appropriate hazard labels. Notify HSEQ Department of unlabeled containers and hold containers until label is affixed.
- Check all chemical products being shipped or delivered have SDS included.
- Maintain a register for all chemicals available at store.
- Always attach a copy of SDS with the chemicals which are send to project site.
- Ensure that all the hazardous substances are transported safely as recommended in SDS.
- Provide spill containment and clean up kits where hazardous substances are stored.
- Ensure that the hazardous substances are stored in accordance with the client and legal requirements or as stated in SDS.
- Operate a “first in first out” (FIFO) policy with respect to material held in storage this reduces the chance for material to exceed the “use by” date.
- Stores shall ensure that material is stored as per SDS and should consider return of any product not required to the supplier.

### 5.4 EMPLOYEES

- All employees shall comply with the requirements of this procedure.
- Take all necessary precautions to protect themselves when working with hazardous chemicals.
- Should know the location of nearest eyewash station.
- Must know how and when to use PPE that are provided by the employer and the PPE that is specified in the SDS to safely handle the chemical.
- Must know how chemicals enter and affect the body. i.e., mouth, nose, skin and eye contact.
- Should know that only the trained personnel are the ones who shall deal with the chemicals.

### 5.5 SUPERVISORS

- Ensure all employees have received appropriate training before engaging them to work with hazardous substances.
- Provide appropriate PPE’s as mentioned in SDS.
- Provide the provision for first aid at each location.
- Explain the risks related to the chemicals being handled and the control measures that shall be implemented.
- Explain emergency evacuation procedure during TBT’s.
- Ensure that all the hazardous substances are transported safely as recommended in SDS.
- Provide spill containment and clean up kits where hazardous substances are stored.

### 5.6 DEPARTMENTS

All Departments should:

- Ensure that all chemical products present in process units, maintenance buildings, or office areas are listed on the Chemical inventory for each location.

- Ensure that all chemical product containers are labeled correctly.
- Conduct Hazard Communication Inspections in conjunction with monthly HSEQ Inspections to review the Chemical inventory and to recheck labeling.
- Provide the HSEQ Department with a list of all chemical products brought onto the Installation or Plant along with a copy of the corresponding SDS.
- Receive and record hazardous substances information from HSEQ Department.
- Train all employees in the safe use and identification of the hazards of chemical materials.
- Provide and instruct on the use of Personal Protective Equipment.
- Return all unwanted chemicals to the warehouse on completion of the job.
- Procurement and persons ordering the material shall only purchase the quantity required for the task.

## 6.0 PROCEDURE

### BCEC's Procedure on Using Chemicals and Other Hazardous Substances

- 6.1 The emphasis at BCEC is to use less hazardous substances wherever and whenever hazardous substances must be used. However, there are common chemicals that are used in the day-to-day running of our business and as such adequate trainings are provided for the employees working with these substances. Some of them can be identified as:
- a) Paints used in the painting of pipes and other related materials
  - b) Oils (diesel, engine oil) used for the running of our vehicles and other equipment's
  - c) Additives
  - d) Solvents
  - e) Resins
- 6.2 **BCEC** has arrangements with various government agencies on the proper disposal of these hazardous wastes to comply with Qatar's regulations on procedure/guidelines to dispose them.
- 6.3 Personal Protective Equipment's (PPEs) are provided as detailed in the SDS is available and issued to those employees working with or handling chemicals and hazardous substances.  
**Note:** PPE that is worn and comes into contact with the hazardous substance shall be disposed of in accordance with the disposal procedure for the hazardous substance.
- 6.3 The Safety Data Sheet (SDS) of each and every chemical is communicated to the users of any particular chemical and is made available within the work station where the chemical or the hazardous substance is being used
- 6.4 Emergency Eye Wash station is located at strategic locations where most of the hazardous substances are being used. As such, any accidental contact with the eye or skin can be quickly dealt with.
- 6.5 **All employees** of BCEC are encouraged to **report** any spillage of hazardous substances or any contact with any of these chemicals in order to receive prompt treatment.

## 7.0 PLANNING / PREPARATIONS

### 7.1 RISK ASSESSMENT

The risks to health, safety and environment associated with using, handling, generating or storing of hazardous chemicals at the workplace must be appropriately managed. Risk assessment is the most effective way to determine the measures required for managing risks and the most effective control measure is to eliminate the risk (by eliminating the need of using hazardous chemicals)

If it is not reasonably practicable, the risk must be minimized by using one or more of the following options as per the hierarchy of controls for managing risk.

- Substitution
- Isolation
- Implementing engineering controls.

Consult with the workers those involved in carrying out the work in the hazard identification and risk assessment process.

### 7.2 CHEMICAL INVENTORY

A register of hazardous chemicals shall be developed and kept up to date which shall include the list of all chemicals used at the projects/offices. SDS of each chemical shall be included with the chemical register and these register shall be easily accessible to all workers those involved in using, handling and storing hazardous substances.

### 7.3 LABELLING

All hazardous substances storage containers shall be clearly labeled. The label on the container in which the hazardous substance is supplied must remain complete, readable and unaltered. If found any containers without proper labeling, immediate action shall be taken to label it correctly or to remove the container from site.

**Note:** Hazardous substances shall not be transferred to or stored in food or beverage containers. The selected container shall be approved for storage of the product.

### 7.4 EMERGENCY PREPAREDNESS

An emergency preparedness plan shall be developed and communicated to all employees those are involved in handling hazardous substances. An emergency preparedness plan shall include:

- An effective response to hazardous chemical emergency
- Emergency contact persons details
- Evacuation procedure
- Communication methods
- First aid assistance

Spill kits shall be available at every location where there is a chance of spill of hazardous substances may occur.

## 7.5 TRAINING AND COMPETENCY

Workers who may be potentially exposed to hazardous chemicals at work shall be provided with appropriate training. The training shall cover:

- All the associated risks identified in the risk assessment
- The safe use of equipment used in handling hazardous chemicals
- The correct use, care and storage of personal protective equipment (PPE) and also cover hygiene (in relation to working with hazardous chemicals)
- Emergency and evacuation procedures.

## 7.6 STORAGE

All hazardous substance storage areas shall be in accordance with the SDS, regulatory requirements and client procedures.

- Area shall be properly labeled with appropriate signages.  
In a weather proof container the following must be held for reference by the emergency services in event of a call out:
  - a) Copy of the SDS for each chemical held in the storage area
  - b) A sheet showing the current inventory in the storage area
- Adequate firefighting equipment's shall be made available
- SDS of chemical shall be available at storage areas
- All chemical drums shall be placed in drip trays
- Spill containment system shall be in place
- Adequate warning signs shall be posted at the chemical storage areas, including emergency contact numbers.
- Access to chemical storage areas shall be restricted.
- As mentioned in SDS, provide proper ventilation or store in a temperature controlled environment

## 8.0 GENERAL RULES ON SAFE HANDLING OF CHEMICALS AND OTHER HAZARDOUS SUBSTANCES

In order to guarantee the safety of the users of chemicals and others who may be affected by their activities, the following steps and precautions must be taken be followed:

- Never use a substance/chemical that does not have a label to reference
- Always consult a chemical's Safety Data Sheet which provides information on safety and health issue and follow the preventive measures established in the Hazard Identification and Risk Assessment.
- Do not mix chemicals without specific authorization from the manufacturer or other qualified and competent person. Mixing incompatible chemicals can produce toxic materials that present unsafe exposure conditions. Refer to the SDS always.
- Always use Personal Protective Equipment (PPE) like gloves, goggles or whatever is appropriate and as prescribed in the SDS.
- Never pour chemicals into an empty, unlabeled material.
- Do not store flammable chemicals near a source of heat.
- Mixing chemicals: where required chemicals shall be mixed strictly in accordance with the manufacturer's instructions. In the event that mixing an acid with water the acid should be added slowly to the water with stirring to reduce heat buildup and possible splashing.

- Ventilate, as recommended by the SDS, when engaging in applications using strong chemicals.
- It is important to wash hands thoroughly before eating, drinking, or smoking to reduce the chance of chemical contamination.
- Store food and beverages in an area where there is no chemical storage.
- Do not eat in an area where there could be chemical contamination.
- Disposal of drums and hazardous substances must be done according to Qatar Environmental Law and disposal Facility requirements.
- Never attempt to hot cut containers, cans or drums which contained hydrocarbons.

## 9.0 REFERENCES

Law of Environment Protection - Law no. 30 of the year 2002



Procedure No.: BCEC/HSE/CP/019  
Effective: 18.04.2018  
Issue Date: 11.04.2018  
Revision No.: 1

## APPENDIX “A”

Typical Safety Data Sheet (SDS) *(Sample Only)*

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SAFE HANDLING OF HAZARDOUS SUBSTANCES  
Prepared by Health, Safety & Environment and Quality (HSEQ) Department  
Approved by Chief Executive Officer

*UNCONTROLLED IF PRINTED. This copy was valid at the time it was printed.*



*Consider the Environment. Please do not print this document unless you really need to, if you need take duplex. At BCEC we support conservation*

## 1. PRODUCT AND COMPANY IDENTIFICATION

**Product Name:** Klean Strip Paint Thinner  
**Company Name:** W. M. Barr  
2105 Channel Avenue  
Memphis, TN 38113  
**Phone Number:** (901)775-0100

**Web site address:** www.wmbarr.com

**Emergency Contact:** 3E 24 Hour Emergency Contact (800)451-8346  
**Information:** W.M. Barr Customer Service (800)398-3892

**Intended Use:** Paint, stain, and varnish thinning.

**Product Code:** CKPT94402, GKPT94002B, DKPT94403CA, EKPT94401, GKPT94002, GKPT94002P, GKPT94002T, GKPT94400, PA12779, QKPT94003, QKPT94203, GKPT94002HDWS, GKPT94002PT, PKPT94004

## 2. HAZARDS IDENTIFICATION

Flammable Liquids, Category 3  
Acute Toxicity: Inhalation, Category 4  
Skin Corrosion/Irritation, Category 2  
Serious Eye Damage/Eye Irritation, Category 2B  
Germ Cell Mutagenicity, Category 1B  
Toxic To Reproduction, Category 2  
Specific Target Organ Toxicity (single exposure), Category 3  
Specific Target Organ Toxicity (repeated exposure), Category 2  
Aspiration Toxicity, Category 1



**GHS Signal Word:**

**Danger**

**GHS Hazard Phrases:**

H226: Flammable liquid and vapor.  
H304: May be fatal if swallowed and enters airways.  
H315: Causes skin irritation.  
H320: Causes eye irritation.  
H332: Harmful if inhaled.  
H336: May cause drowsiness or dizziness.  
H340: May cause genetic defects.  
H361: Suspected of damaging fertility or the unborn child.  
H373: May cause damage to Central Nervous System (CNS) through prolonged or repeated exposure.

**GHS Precaution Phrases:**

P201: Obtain special instructions before use.  
P202: Do not handle until all safety precautions have been read and understood.  
P210: Keep away from heat/sparks/open flames/hot surfaces. - No smoking.  
P233: Keep container tightly closed.  
P240: Ground/bond container and receiving equipment.  
P241: Use explosion-proof electrical/ventilating/lighting equipment.  
P242: Use only non-sparking tools.  
P243: Take precautionary measures against static discharge.  
P260: Do not breathe gas/mist/vapors/spray.  
P264: Wash hands thoroughly after handling.  
P271: Use only outdoors or in a well-ventilated area.  
P280: Wear protective gloves/protective clothing/eye protection/face protection.  
P281: Use personal protective equipment as required.

# SAFETY DATA SHEET

## Klean Strip Paint Thinner

Revision: 05/24/2017  
Supersedes Revision: 11/16/2015

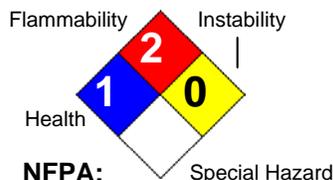
P235: Keep cool.

**GHS Response Phrases:**

P301+310: IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician.  
P302+352: IF ON SKIN: Wash with plenty of soap and water.  
P303+361+353: IF ON SKIN (or hair): Remove/take off immediately all contaminated clothing. Rinse skin with water/shower.  
P304+340: IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.  
P305+351+338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.  
P308+313: IF exposed or concerned: Get medical attention/advice.  
P312: Call a POISON CENTER or doctor/physician if you feel unwell.  
P314: Get medical attention/advice if you feel unwell.  
P321: Specific treatment see label.  
P331: Do NOT induce vomiting.  
P332+313: If skin irritation occurs, get medical advice/attention.  
P337+313: If eye irritation persists, get medical advice/attention.  
P362: Take off contaminated clothing and wash before re-use.  
P370+378: In case of fire, use dry chemical powder to extinguish.  
P403+233: Store container tightly closed in well-ventilated place.  
P405: Store locked up.  
P501: Dispose of contents/container according to local, state and federal regulations.

**GHS Storage and Disposal Phrases:****Hazard Rating System:**

HEALTH	*	1
FLAMMABILITY		2
PHYSICAL		0
PPE		

**HMIS:****OSHA Regulatory Status:**

This material is classified as hazardous under OSHA regulations.

**Potential Health Effects (Acute and Chronic):****Inhalation Acute Exposure Effects:**

May cause dizziness; headache; watering of eyes; eye irritation; weakness; nausea; muscle twitches, and depression of central nervous system. Severe overexposure may cause convulsions; unconsciousness; and death. Intentional misuse of this product by deliberately concentrating and inhaling can be harmful or fatal.

**Skin Contact Acute Exposure Effects:**

May cause irritation; numbness in the fingers and arms; drying of skin; and dermatitis. May cause increased severity of symptoms listed under inhalation.

**Eye Contact Acute Exposure Effects:**

This material is an eye irritant. May cause irritation; burns; conjunctivitis of eyes; and corneal ulcerations of the eye. Vapors may irritate eyes.

**Ingestion Acute Exposure Effects:**

Harmful or fatal if swallowed. May cause nausea; weakness; muscle twitches; gastrointestinal irritation; and diarrhea. Severe overexposure may cause convulsions; unconsciousness; and death.

**Chronic Exposure Effects:**

Reports have associated repeated and prolonged overexposure to solvents with neurological and other physiological damage. Prolonged or repeated contact may cause dermatitis. May cause jaundice; bone marrow damage; liver damage; anemia; and skin irritation.

**Medical Conditions Generally** Diseases of the skin, eyes, liver, kidneys, central nervous system and respiratory

# SAFETY DATA SHEET

## Klean Strip Paint Thinner

Page: 3

Revision: 05/24/2017  
Supersedes Revision: 11/16/2015

**Aggravated By Exposure:** system.

### 3. COMPOSITION/INFORMATION ON INGREDIENTS

CAS #	Hazardous Components (Chemical Name)	Concentration
8052-41-3	Stoddard solvent {Mineral spirits; Aliphatic Petroleum Distillates; White spirits}	<=95.0 %
25551-13-7	Benzene, Trimethyl-	<=5.0 %

**Additional Chemical Information** Ingredients vary due to multiple blends and/or raw material suppliers

### 4. FIRST AID MEASURES

#### Emergency and First Aid Procedures:

**Inhalation:**  
If user experiences breathing difficulty, move to air free of vapors, Administer oxygen or artificial medical assistance can be rendered.

**Skin Contact:**  
Wash with soap and large quantities of water and seek medical attention if irritation from contact persists.

**Eye Contact:**  
Flush with large quantities of water for at least 15 minutes and seek immediate medical attention.

**Ingestion:**  
Do not induce vomiting. Call your local poison control center, hospital emergency room or physician immediately for instructions to induce vomiting.

If spontaneous vomiting is about to occur, place victim's head below knees. If victim is drowsy or unconscious, place on the left side with head down. Never give anything by mouth to a person who is not fully conscious. Do not leave victim unattended. Seek medical attention immediately.

#### Signs and Symptoms Of Exposure:

Inhalation, ingestion, and dermal are possible routes of exposure.

#### Note to Physician:

Call your local poison control center for further information.

**Inhalation:** Inhalation overexposure can produce toxic effects. Monitor for respiratory distress. If cough or difficulty in breathing develops, evaluate for upper respiratory tract inflammation, bronchitis, and pneumonitis. Administer supplemental oxygen with assisted ventilation as required.

**Ingestion:** If ingested, this material presents a significant aspiration and chemical pneumonitis hazard. Induction of emesis is not recommended. Consider activated charcoal and/or gastric lavage. If patient is obtunded, protect the airway by cuffed endotracheal intubation or by placement of the body in a Trendelenburg and left lateral decubitus position.

## 5. FIRE FIGHTING MEASURES

<b>Flammability Classification:</b>	NFPA Class II
<b>Flash Pt:</b>	> 100.00 F
<b>Explosive Limits:</b>	LEL: 0.5                      UEL: 6
<b>Autoignition Pt:</b>	No data.
<b>Suitable Extinguishing Media:</b>	Use carbon dioxide, dry chemical powder, or foam.
<b>Fire Fighting Instructions:</b>	Self-contained respiratory protection should be provided for fire fighters fighting fires in buildings or confined areas. Storage containers exposed to fire should be kept cool with water spray to prevent pressure build-up. Stay away from heads of containers that have been exposed to intense heat or flame.
<b>Flammable Properties and Hazards:</b>	Combustible Liquid.

## 6. ACCIDENTAL RELEASE MEASURES

<b>Steps To Be Taken In Case Material Is Released Or Spilled:</b>	Clean up:  Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind, out of low areas, and ventilate closed spaces before entering. Shut off ignition sources; keep flares, smoking or flames out of hazard area.  Small spills:  Take up with sand, earth or other noncombustible absorbent material and place in a plastic container where applicable.  Large spills:  Dike far ahead of spill for later disposal.  Waste Disposal:  Dispose in accordance with applicable local, state and federal regulations.
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## 7. HANDLING AND STORAGE

<b>Precautions To Be Taken in Handling:</b>	Read carefully all cautions and directions on product label before use. Since empty container retains residue, follow all label warnings even after container is empty. Dispose of empty container according to all regulations. Do not reuse this container.  A static electrical charge can accumulate when this material is flowing through pipes, nozzles or filters, and when it is agitated. A static spark discharge can ignite accumulated vapors particularly during dry weather conditions. Always use proper bonding and grounding procedures.
<b>Precautions To Be Taken in Storing:</b>	Keep container tightly closed when not in use. Store in a cool, dry place. Do not store near flames or at elevated temperatures.

## 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

# SAFETY DATA SHEET

## Klean Strip Paint Thinner

Page: 5

Revision: 05/24/2017  
Supersedes Revision: 11/16/2015

CAS #	Partial Chemical Name	OSHA TWA	ACGIH TWA	Other Limits
8052-41-3	Stoddard solvent {Mineral spirits; Aliphatic Petroleum Distillates; White spirits}	PEL: 500 ppm	TLV: 100 ppm	No data.
25551-13-7	Benzene, Trimethyl-	No data.	TLV: 25 ppm	No data.

<b>Respiratory Equipment (Specify Type):</b>	For OSHA controlled work place and other regular users. Use only with adequate ventilation under engineered air control systems designed to prevent exceeding appropriate TLV. For occasional use, where engineered air control is not feasible, use properly maintained and properly fitted NIOSH approved respirator for organic solvent vapors. A dust mask does not provide protection against vapors.
<b>Eye Protection:</b>	Safety glasses, goggles or face shields are recommended to safeguard against potential eye contact, irritation, or injury. Contact lenses should not be worn while working with chemicals.
<b>Protective Gloves:</b>	Wear impermeable gloves. Gloves contaminated with product should be discarded. Promptly remove clothing that becomes soiled with product.
<b>Other Protective Clothing:</b>	Various application methods can dictate use of additional protective safety equipment, such as impermeable aprons, etc., to minimize exposure. Before reuse, thoroughly clean any clothing or protective equipment that has been contaminated by prior use. Discard any clothing or other protective equipment that cannot be decontaminated, such as gloves or shoes.
<b>Engineering Controls (Ventilation etc.):</b>	Use only with adequate ventilation to prevent build-up of vapors. Open all windows and doors. Use only with a cross ventilation of moving fresh air across the work area. If strong odor is noticed or you experience slight dizziness, headache, nausea, or eye-watering - Stop - ventilation is inadequate. Leave area immediately.
<b>Work/Hygienic/Maintenance Practices:</b>	A source of clean water should be available in the work area for flushing eyes and skin. Do not eat, drink, or smoke in the work area. Wash hands thoroughly after use.

## 9. PHYSICAL AND CHEMICAL PROPERTIES

<b>Physical States:</b>	[ ] Gas [ X ] Liquid [ ] Solid
<b>Appearance and Odor:</b>	Water White / Free and Clear
<b>Melting Point:</b>	No data.
<b>Boiling Point:</b>	318.00 F - 385.00 F
<b>Autoignition Pt:</b>	No data.
<b>Flash Pt:</b>	> 100.00 F
<b>Explosive Limits:</b>	LEL: 0.5 UEL: 6
<b>Specific Gravity (Water = 1):</b>	0.78
<b>Vapor Pressure (vs. Air or mm Hg):</b>	0.3 MM HG at 68.0 F
<b>Vapor Density (vs. Air = 1):</b>	5 Air = 1
<b>Evaporation Rate:</b>	No data.
<b>Solubility in Water:</b>	No data.
<b>Solubility Notes:</b>	Very slightly soluble in cold water.
<b>Percent Volatile:</b>	100.0 % by weight.
<b>VOC / Volume:</b>	778.0000 G/L

## 10. STABILITY AND REACTIVITY

**Stability:** Unstable [ ] Stable [ X ]

**Conditions To Avoid - Instability:** No data available.

**Incompatibility - Materials To Avoid:** Incompatible with strong acids, alkalies, and oxidizers such as liquid chlorine and oxygen.

**Hazardous Decomposition or Byproducts:** Decomposition may produce carbon monoxide and carbon dioxide.

**Possibility of Hazardous Reactions:** Will occur [ ] Will not occur [ X ]

**Conditions To Avoid - Hazardous Reactions:** No data available.

## 11. TOXICOLOGICAL INFORMATION

**Toxicological Information:** Refer to section 2 for acute and chronic effects.

CAS# 25551-13-7:  
 Standard Draize Test, Skin, Species: Rabbit, 500.0 MG, 24 H, Moderate.  
 Result:  
 Kidney, Ureter, Bladder: Changes in liver weight.  
 Endocrine: Changes in thymus weight.  
 Immunological Including Allergic: Decreased immune response.  
 - "Sbornik Vysledku Toxilogickeho Vysetreni Latek A Pripravku," , Institut Pro Vychovu Vedoucicn P, Marhold, J.V., Institut Pro Vychovu Vedoucicn, Pracovniku Chemickeho, Prumyclu Praha Czechoslovakia, Vol/p/yr: -,24, 1972

Standard Draize Test, Eyes, Species: Rabbit, 500.0 MG, 24 H, Mild.  
 Result:  
 Kidney, Ureter, Bladder: Changes in liver weight.  
 Kidney, Ureter, Bladder: Changes in bladder weight.  
 Nutritional and Gross Metabolic: Weight loss or decreased weight gain.  
 - "Sbornik Vysledku Toxilogickeho Vysetreni Latek A Pripravku," , Institut Pro Vychovu Vedoucicn P, Marhold, J.V., Institut Pro Vychovu Vedoucicn, Pracovniku Chemickeho, Prumyclu Praha Czechoslovakia, Vol/p/yr: -,24, 1972

CAS #	Hazardous Components (Chemical Name)	NTP	IARC	ACGIH	OSHA
8052-41-3	Stoddard solvent {Mineral spirits; Aliphatic Petroleum Distillates; White spirits}	n.a.	n.a.	n.a.	n.a.
25551-13-7	Benzene, Trimethyl-	n.a.	n.a.	n.a.	n.a.

## 12. ECOLOGICAL INFORMATION

No data available.

## 13. DISPOSAL CONSIDERATIONS

**Waste Disposal Method:** Dispose in accordance with federal, state, and local regulations.

## 14. TRANSPORT INFORMATION

**LAND TRANSPORT (US DOT):**

**DOT Proper Shipping Name:** Paint Related Material, Exempt Combustible Liquid per 49 CFR 173.150(f)  
**DOT Hazard Class:**  
**UN/NA Number:**

**Additional Transport Information:**

The supplier may apply one of the following exceptions: Combustible Liquid, Consumer Commodity, Limited Quantity, Viscous Liquid, Does Not Sustain Combustion, or others, as allowed under 49CFR Hazmat Regulations. Please consult 49CFR Subchapter C to ensure that subsequent shipments comply with these exceptions.

## 15. REGULATORY INFORMATION

**EPA SARA (Superfund Amendments and Reauthorization Act of 1986) Lists**

CAS #	Hazardous Components (Chemical Name)	S. 302 (EHS)	S. 304 RQ	S. 313 (TRI)
8052-41-3	Stoddard solvent {Mineral spirits; Aliphatic Petroleum Distillates; White spirits}	No	No	No
25551-13-7	Benzene, Trimethyl-	No	No	No

**This material meets the EPA 'Hazard Categories' defined for SARA Title III Sections 311/312 as indicated:**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Acute (immediate) Health Hazard
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Chronic (delayed) Health Hazard
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Fire Hazard
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Sudden Release of Pressure Hazard
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Reactive Hazard

CAS #	Hazardous Components (Chemical Name)	Other US EPA or State Lists
8052-41-3	Stoddard solvent {Mineral spirits; Aliphatic Petroleum Distillates; White spirits}	CAA HAP,ODC: No; CWA NPDES: No; TSCA: Yes - Inventory; CA PROP.65: No
25551-13-7	Benzene, Trimethyl-	CAA HAP,ODC: No; CWA NPDES: No; TSCA: Yes - Inventory; CA PROP.65: No

**Regulatory Information:**

This product is regulated by the United States Consumer Product Safety Commission and is subject to certain labeling requirements under the Federal Hazardous Substances Act. These requirements differ from the classification criteria and hazard information required for safety data sheets (SDS). The product label also includes other important information, including directions for use, and should always be read in its entirety prior to using the product.

## 16. OTHER INFORMATION

**Revision Date:** 05/24/2017  
**Preparer Name:** W.M. Barr and Company, Inc. (901)775-0100  
**Additional Information About This Product:** No data available.

**Company Policy or Disclaimer:** The information contained herein is presented in good faith and believed to be accurate as of the effective date shown above. This information is furnished without warranty of any kind. Employers should use this information only as a supplement to other information gathered by them and must make independent determination of suitability and completeness of information from all sources to assure proper use of these materials and the safety and health of employees. Any use of this data and information must be determined by the user to be in accordance with applicable federal, state and local laws and regulations.

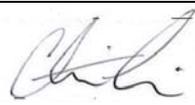
# PROCEDURE

HEALTH, SAFETY, ENVIRONMENT & QUALITY

## ENVIRONMENTAL ASPECTS AND IMPACTS

**REVISION HISTORY**

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
0	20.05.2013	First Issue and for implementation of control procedure on Environment Aspects and Impacts.	27.05.2013
1	14.11.2016	Re-issue for re-validation with minor changes on the contents. Update on Signatories; Replaced/re-named Executive General Manager (EGM) to Chief Executive Officer (CEO wherever mentioned in the whole procedure document.	14.11.2016
2	16.08.2018	Revised to comply with ISO 14001:2015 Standard.	16.08.2018

Action	Responsible	Signature	Date
Initiated & Prepared by:	D. Guinto		16.08.2018
Checked & Reviewed by:	C.P. Gibson		16.08.2018
Approved by:	P. Borchetta		16.08.2018

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### REVISION HISTORY

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*Attachment No. 1* - Environmental Aspect & Impact Register with Life Cycle Perspective on BCEC & BCCES Activities and Services-BCEC/HSE/QS-062/REV.XX

*Attachment No. 2* - Environmental Aspect & Impact Assessment-BCEC/HSE/QS-037/ REV.XX

**1.0 INTERNAL CONTROLS**

**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this Procedure.

The **Health, Safety, Environment & Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

**1.2 APPROVAL**

This procedure and any amendments made thereto; require the following approvals:

**Authority**

**Date**

  
HSEQ Manager

16.08.2018

  
Chief Executive Officer

16.08.2018

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed  Date 16.08.2018

## 2.0 PURPOSE

Black Cat has established this procedure to identify environmental aspects that are associated with the activities, operations, products or services and determine those aspects that have or can have a significant impact to the environment, considering a life cycle perspective.

## 3.0 SCOPE

- 3.1 Environmental reviews are used, within the constraints of the business operating parameters, to identify the elements that can be controlled and that can have significant adverse or beneficial impacts on the environment.
- 3.2 The environmental aspects that are associated with the activities, operations, products or services that are defined within the scope of the Environmental Management System (EMS) ISO 14001:2015 are identified and documented.
- 3.3 The relationship between environmental aspects and environmental impacts is one of cause and effect where:
- An environmental aspect refers to an element of the company's activities, operations products or services, which can have a beneficial or adverse impact on the environment.
  - An environmental impact refers to the change, which takes place in the environment as a result of the aspect.
- 3.4 Reviews of environmental aspects are conducted where:
- Initial reviews are carried out regularly during scheduled Monthly HSE Meetings to determine what the environmental aspects are, taking into consideration the inputs and outputs associated with the current and relevant past activities, products or services.
  - Intermediate reviews by the *HSEQ team* take into consideration normal and abnormal operations and potential emergency conditions.
  - Continual reviews of environmental aspects shall be conducted by the top management during Management Review Meeting (MRM) as part of the agenda in management review in order to maintain continual improvement, suitability and effectiveness of the EMS.

## 4.0 DEFINITION OF TERMS

The following definitions in the beginning here will help understand the procedure:

- A. Environment – Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interactions.
- B. Environmental Aspects - Elements of an organization's activities, products or services, that can interact with the environment.

*Aspects can be divided into direct and indirect.*

Direct environmental aspects are associated with activities, products, and services of the organization itself, over which it has direct management control (e.g., how to manage waste on site).

Indirect environmental aspects are associated with activities for non-industrial organizations (e.g., how subcontractor manages waste on site, chain controlled aspects, customer controlled aspects).

- C. Environmental Impact – Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization’s environmental aspects

A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.

- D. HSEQ Team – Health, Safety, Environment & Quality team consist of all personnel or designated personnel by HSEQ Department.
- E. Life Cycle – Consecutive and interlinked stages of a product or service system, from raw material acquisition or generation from natural resources to final disposal. Life cycle stages include acquisition of raw materials, design, production, transportation/delivery, use, end-of-life treatment and final disposal.

Life Cycle perspective – According to ISO 14001:2015, is a systematic approach to environmental management that can provide top management with information to build success over the long term and create options to the organization for contributing to sustainable development by controlling or influencing the way the organization's products and services are designed, manufactured, distributed, consumed and disposed by using a life cycle perspective that can prevent environmental impacts from being unintentionally shifted elsewhere within the life cycle.

## 5.0 RESPONSIBILITIES

To demonstrate leadership and commitment, there are specific responsibilities related to the environmental management system in which top management should be personally involved or which top management should direct.

Top management has delegated responsibility for these actions to “Management Representative (MR)” as part of Black Cat QHSE Leadership Team, but it retains accountability for ensuring the actions are performed.

### 5.1 *Management Representative (MR) QHSE*

- Responsible for the approval, implementation and maintenance of this procedure covering environmental aspects.
- Reporting of the environmental performance to top management.

### 5.2 *HSEQ team*

- Responsible for performing the Environmental Aspects Evaluation and for compiling and maintaining a file of the identified Environmental Aspects.
- Participates in regularly scheduled Monthly HSE Meetings to perform initial reviews and direct the implementation phases of EMS processes.
- Responsible to identify the personnel responsible for specific environmental assessment. These personnel are responsible to perform the required environmental assessments and report the findings by completing the Environmental Aspect & Impact Assessment (EA/IA), Form no. BCEC/HSEQ/QS-037.
- To communicate the significant environmental aspects among the various levels and functions of the organization, as appropriate.

## 6.0 PROCEDURE

### Environmental Aspects

Within the defined scope of the environmental management system, the Company shall determine the environmental aspects of its activities, products and services that it can control and those that it can influence, and their associated environmental impacts, considering a life cycle perspective.

The Company has considered the life cycle perspective for environmental aspects that have been identified, abnormal conditions, reasonably foreseeable emergency situations and change, including planned or new developments, and new or modified activities, products and services.

### 6.1 Identification of Environmental Aspects and Impacts

#### 6.1.1 Select an Activity, a Product or Service:

The selected activity, operation, product or service should be large enough for meaningful examination, and small enough to be sufficiently understood.

#### 6.1.2 Identify Environmental Aspects of the Activity, Product or Service:

Identify as many environmental aspects or causes as possible associated with the selected activity, operation, product or service.

The identification of environmental aspects and the evaluation of the environmental impacts associated with the activities, operations, products or services considers where applicable are: "emissions to the air, releases to the water, waste management, contamination to the land, use of raw materials or chemicals and its disposal, natural resources and other local environmental and community issues".

#### 6.1.3 Identify Environmental Impacts:

From the results of the initial assessment, identify as many actual and potential, positive or negative, environmental impacts as possible.

#### 6.1.4 Evaluate Significant Impacts:

- Evaluation of environmental concerns takes into consideration, the scale of the impact, the severity of the impact, the probability of occurrence, and duration of the impact.
- Evaluation of business concerns include the cost of changing the impact, the difficulty of changing the impact, the effect of change of other activities and processes, the concerns of interested parties, and the effect on the public image of the Company.
- The evaluation of impacts are summarized as having high-Hi, medium-Med, low-Lo, or none-No significance. The impacts evaluated as High significance are candidates for environmental programs.

#### 6.1.5 Assign Responsibility:

- Identify the personnel who are responsible for each Activity, Product or Service. These personnel will be the prime participants in environmental programs that will result from the assessment.

#### 6.1.6 The identification of environmental aspects and impacts with consideration to Life Cycle Perspective make use of the Environmental Aspect & Impact (EA/I) Register, Form no. BCEC/HSEQ/QS-062.

- 6.1.7 The HSEQ team shall communicate its significant environmental aspects among the various levels and functions of the organization, as appropriate.
- 6.1.8 During the process of identifying environmental aspects any incomplete, ambiguous or conflicting requirements are resolved with those responsible for imposing these requirements.
- 6.1.9 The selected activities, products, and services have some effect on the environment, and this can occur in any life cycle stage of any activity, product, or service, i.e., from purchasing and distribution to usage and disposal. Such impacts can be local, regional, or global, long term and short term, with different levels of significance. The relationship between environmental aspects and impacts is one of cause and effect.



- 6.1.10 With the understanding of environmental impacts, the Company shall implement controls at each stage of Life Cycle appropriately. The organization can consider those stages in the life cycle over which it has the greatest control or influence as these may offer the greatest opportunity to reduce resource use and minimize pollution or waste.
- Set environmental considerations
  - Set purchasing requirements  
Our influence over our suppliers is controlled by our corporate requirement to use only those suppliers that have been approved through our corporate supplier/subcontractor approval process and client's vendors approval list.
  - Implement environmental protection controls
  - Provide advisory/information on proper use of material to reduce environmental concerns
  - Set disposing requirements

Refer to the following procedures – BCEC/HSECP/011-Housekeeping & Waste Management Control and BCEC/FIN/CP/006-Disposal of Surplus, Obsolete and Scrap Materials

6.1.11 The Company had understood and identified those environmental aspects that have or can have a significant environmental impact, i.e. significant environmental aspects, by using established criteria.

**Note:** Significant environmental aspects can result in risks and opportunities associated with either adverse environmental impacts (threats) or beneficial environmental impacts (opportunities).

**6.2 Criteria used to determined its Significant Environmental Aspects**

6.2.1 Determining the criteria

The Company shall consider the following factors for determining the significance of the environmental aspects:

- Condition of the environment or environmental protection – such as scale, severity, and duration of the impact; or type, size, and frequency of environmental aspects
- Legal and other requirements – e.g., limitations for emissions, licenses for emissions, regulations, etc.
- Needs and expectations of interested parties – such as the ones related to the values of the organization, reputation, noise, smell, or visual degradation

6.2.3 Criteria for the significance can be related either to the environmental aspects or the environmental impacts. When applying the criteria, the organization needs to set levels or values of the significance related to each criterion, e.g., based on possibility of occurrence (probability/frequency) and its severity (consequence/intensity).

6.2.4 To determine which impact has the highest risk (risk = probability x consequence). A number of elements can be added to the method: compliance with legislation and regulations, the potential for improvement of the environmental aspect, and any requirements from the head office are also considered. Of course, there are many possible variations to this approach. The organization needs to determine what environmental aspects are significant by using the limit values.

The required environmental aspect and impact assessment make use of the Environmental Aspect & Impact Assessment (EA/IA), Form no. BCEC/HSEQ/QS-037.

Classification/Rating	Importance and Action	Criteria (one or the combination of ):
<b>High</b>	Immediate Action and/or control are mandatory	<ul style="list-style-type: none"> <li>▪ “Aspect” is currently not controlled under normal operations.</li> <li>▪ Could break legal or policy documents.</li> <li>▪ In breach of legislation</li> <li>▪ Sensitive environment (groundwater proximity, conservation area, residential area)</li> <li>▪ Repeated complaints</li> </ul>

Classification/Rating	Importance and Action	Criteria (one or the combination of ):
<b>Medium</b>	Action and/or control are required in the near future	<ul style="list-style-type: none"> <li>▪ Exceeding of threshold values in case of operating problems (abnormal conditions) and above average high probability of occurrence and/or low probability of detection.</li> <li>▪ Financial threat</li> <li>▪ Effect likely to increase under planned activities</li> <li>▪ Rising concern of shareholders</li> <li>▪ Emergency situation would cause a large environmental impact</li> <li>▪ Complaint received</li> <li>▪ "Aspect" not fully controlled under normal conditions</li> </ul>
<b>Low</b>	Little or negligible action and/or control are useful, but not required in the short term, review in the future is useful	<ul style="list-style-type: none"> <li>▪ Exceeding of threshold value in case of operating problems (abnormal conditions) and low effect and low probability of occurrence and/or high probability of detection.</li> <li>▪ Minimal effect</li> <li>▪ Limited probability of occurrence</li> <li>▪ "Aspect" controlled under normal conditions</li> <li>▪ High knowledge of "Aspect"</li> </ul>

Risk Assessment Matrix						
		Probability				
		10	5	3	1	0.5
Consequences	10	<b>HIGH</b>				
	5		<b>MEDIUM</b>			
	3			<b>LOW</b>		
	2					
	1					

## 7.0 RECORDS

7.1 Notes of the *HSEQ team* activities are recorded and issued using typical internal memo to summarize items such as the decisions taken, the actions taken, results, conclusions reached and next actions required, and are retained as environmental records.

A register of the environmental aspects shall be kept up to date and takes into account planned new or modified activities, products, or services.

## 8.0 REFERENCE

8.1 Clause nos. 6.1.2 & 8.1 of the ISO 14001:2015 Standard

Procedure No.: BCEC/HSEQ/CP/024  
Effective: 16.08.2018  
Issue Date: 16.08.2018  
Revision No.: 2

## ATTACHMENTS

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ENVIRONMENTAL ASPECTS AND IMPACTS  
Prepared by HSEQ Department  
Approved by Chief Executive Officer

*UNCONTROLLED IF PRINTED. This copy was valid at the time it was printed.*



*Consider the Environment. Please do not print this document unless you really need to, if you need take duplex. At BCEC we support conservation.*

**ENVIRONMENTAL ASPECT/IMPACT REGISTER with  
LIFE CYCLE PERSPECTIVE ON BCEC & BCCES ACTIVITIES AND SERVICES**

Sl. No.	DEPARTMENT	ACTIVITIES/SERVICES	RESOURCES/MATERIALS	ASPECT	IMPACT	USE & MAINTENANCE/CONTROL MEASURES	END OF LIFE TREATMENT
1	General (Applicable to All Departments)	Printing documents Paper works Filing documents	Paper Photocopying Office Supplies/ Stationery Materials	Waste generated like plastic, paper, carton/box, etc. Disposal of used paper	Soil / land contamination Decrease landfill space	Monitoring on the Monthly consumption of paper photocopying Implement Documents Retention & Disposal Schedule Provide adequate dust bins Always print double sided Reduce Paper usage Do not print if really not in need Keep soft or electronic copies as possible	Waste segregation-select recyclable paper and plastic materials; Recycle the waste generated; Reuse office supplies/stationery materials i.e., folder, box file; Dispose to waste recycling company for re-using and recycling purposes.
2		Supply of Electricity	Electricity- Electronics equipment (computer, light, air-cooling system, printer, etc.)	Consumption of Electricity	Depletion of natural resources	Monitoring on the Monthly consumption of electricity Conduct periodic maintenance to all electrical equipment Awareness to all staff Use good quality/standard equipment Conservation of energy	Ensure all electrical equipment are switched off when not in use.
3		Water supply at washrooms/ toilets and pantry;	Water	Usage of water at washrooms/ toilets and pantry; Leakage Waste Water disposal	Depletion of natural resources	Do not dispose food waste through general drainage system Awareness to all staff Monitoring of the use of water-Monthly consumption Frequent inspections to ensure no spillage occurs or leaks dealt with promptly (isolation shall be done until repaired) Regular maintenance of toilet and sink/pantry Frequent inspections and reporting leaks promptly to ensure no spillage occurs	Disposal shall be done through municipal drainage system.
4		Supply of Drinking/Bottled Water	Drinking Water	Consumption of Drinking Water Used Bottle container	Soil/land contamination	Ensure water supplier is ISO certified Maintain record of Monthly Consumption Report of drinking water	Return used/empty bottles for refilling/reuse by the Supplier.
5		Food handling	Food	Food waste disposal	Air and soil contamination	Adequate waste skips shall be provided in the office pantry Waste skips shall be covered at all times	Daily disposal of waste generated.
6		Use of air conditioning units at office	Air conditioner	Release of refrigerant gas	Air pollution Global warming / Ozone depletion	Periodic maintenance of all air conditioning equipment to ensure that no leaks to any hoses Use refrigerant of approved type	Use refrigerant of approved type Once aircondition unit reaches end of life engage maintenance company to influence environmental sustainable disposal
7		General (Applicable to All Departments)	Smoking	Cigarettes/tobaccos	Release of toxic smoke	Degradation Air Quality Air pollution	Provide designated smoking area Adequate ventilation must be given

**ENVIRONMENTAL ASPECT/IMPACT REGISTER with  
LIFE CYCLE PERSPECTIVE ON BCEC & BCCES ACTIVITIES AND SERVICES**

Sl. No.	DEPARTMENT	ACTIVITIES/SERVICES	RESOURCES/MATERIALS	ASPECT	IMPACT	USE & MAINTENANCE/CONTROL MEASURES	END OF LIFE TREATMENT
8	Administration	Provides transport/vehicle use for employees; Provides and facilitate request for Office Furniture & Equipment and Fire Extinguishers Provides soft and hard furnishing for Staff Accommodation	Diesel Fuel Company-owned vehicles/ Leased vehicles Office Furniture & Equipment Electricity Supplies Maintenance Supplies Admin. Supplies Pillow, blanket, bed sheet, mattress, bed, cupboard/wardrobe	Vehicle Repair & Maintenance Petroleum Product /Fuel usage and consumption Material Storage Use of Electricity Water Quality Monitoring Support Building Maintenance	Waste Disposal Air Emissions Biogas Potential Spills Leachate Solid Waste Natural Resource Consumption	Ensure all electrical equipment are switched off when not in use. Use good quality/standard equipment Conduct periodic maintenance to all electrical equipment Carry out routine vehicle checks Periodic maintenance of vehicles Controlled use of vehicles (utilizing pool vehicles to go to site)	Waste Management Permit/Agreement with Ministry of Municipality and Environment Waste Treatment Department for Waste Disposal of glass, paper, carton, wood, plastic, aluminum and steel; Dispose to waste recycling company for re-using and recycling purposes or Dispose to supplier/vendor who has recycling program for its product which is end-of-life; Comply with established procedure on Disposal of Surplus, Obsolete and Scrap Materials; All products to be disposed of responsibly when they reach end of life - products and materials that reach end of life where BCEC does not have controlling influence BCEC will endeavour to influence environmentally sustainable outcome for the disposal.
9		Cleaning with solvents/chemicals	Cleaning materials, solvents and chemicals	Spill of cleaning agents; Disposal of empty containers	Soil contamination	Use of approved cleaning agents in use Ensure safe storage of cleaning agents and properly labeled containers Provide training to people using cleaning agents Use of cleaning agents as per the manufacturer instruction / MSDS.; Ensure that paint cans are disposed in approved hazardous disposal facilities.	Use of approved cleaning agents in use; Ensure safe storage of cleaning agents and properly labeled containers; Provide training to people using cleaning agents; Use of cleaning agents as per the manufacturer instruction/MSDS; Ensure that paint cans are disposed in approved hazardous disposal facilities.
10	HR	Manpower Recruitment; Mobilization & Demobilization; Maintenance of Employee Records; Payroll processing	Paper Photocopying; Stationery materials/ office supplies	Generation and filing of Personal Records & Documents (Hard copies) of Employees; Usage of paper and stationery materials/office supplies	Disposal of used paper	Monitoring on the Monthly consumption of paper photocopying Implement Documents Retention & Disposal Schedule Provide adequate dust bins Always print two side Reduce Paper usage Do not print if really not in need Keep soft or electronic copies as possible	Waste segregation-select recyclable paper and plastic materials; Reuse other supplies/stationery for filing Recycle the waste generated; Dispose to waste recycling company for re-using and recycling purposes.
11	Proposals	Tendering - Printing and Preparation of documents for submittals	Paper Photocopying Use of computers ink cartridges, CD's, stationery materials Sealing wax	Waste Disposal	Soil/land contamination	Monitoring on the Monthly consumption of paper photocopying Implement Documents Retention & Disposal Schedule Provide adequate dust bins Always print two side Reduce Paper usage Do not print if really not in need Keep soft or electronic copies as possible	Waste segregation-select recyclable paper and plastic materials; Recycle the waste generated; Reuse office supplies/stationery materials i.e., folder, box file; Dispose to waste recycling company for re-using and recycling purposes.

**ENVIRONMENTAL ASPECT/IMPACT REGISTER with  
LIFE CYCLE PERSPECTIVE ON BCEC & BCCES ACTIVITIES AND SERVICES**

Sl. No.	DEPARTMENT	ACTIVITIES/SERVICES	RESOURCES/MATERIALS	ASPECT	IMPACT	USE & MAINTENANCE/CONTROL MEASURES	END OF LIFE TREATMENT
12	IT	Operation of IT equipment and other devices; In-house help desk support services for software, hardware, network & internet Facilitate request for new and replacement of computers, laptops expired batteries and other portable devices	IT Equipment - i.e., Computer, Laptops, Computers - CPUs, Monitors, portable devices - mouse, keyboard and other IT equipment	Disposal of materials Disposal of used/obsolete, scrap batteries/chargers, computers, laptops and other e-waste	Environmental pollution	Consider purchase of materials that are eco-friendly; Provide advisory on proper use of computers to reduce environmental concerns.	Ensure proper disposal of cartridges and other used IT consumables Ensure that batteries are disposed in approved hazardous disposal facilities. Batteries shall be collected separately for disposal. Comply with established procedure on Disposal of Surplus, Obsolete and Scrap Materials Dispose to supplier/vendor who has recycling program for its product which is end-of-life e.g. computers, light bulb, etc. With approved Sub-contractor for proper collection/transport of E-waste and responsible for the proper disposal of E-waste as per norms of concerned Qatar Government authorities and as per Qatar regulation.
13	Procurement	Local & Foreign Purchase of Materials for office use and projects	Various Materials	Solid waste Hazardous waste	Environmental pollution	Selection of Suppliers/Vendors/Subcontractors in accordance with Procurement Procedure; Manufacturer ISO Certified; Ensure Suppliers/Vendors/Subcontractors are ISO Certified; Use only Approved and Pre-qualified Vendors' list by Black Cat and Clients; Conduct Vendor and Subcontractor Audits by BCEC Internal Auditors; For Vendor - conduct Factory Acceptance Test (FAT) by TPI or with QA/QC Representative; Delivery of Materials - conduct Site Acceptance Test (SAT) by QAQC;	Comply with established procedure on Disposal of Surplus, Obsolete and Scrap Materials - end of life recycling; Excess Materials from completed project will be stored in the main store to issue for reuse/use to another or next projects; Sell for scrap to vendor or other recycling company for re-using; All products to be disposed of responsibly when they reach end of life - products and materials that reach end of life where BCEC does not have controlling influence BCEC will endeavour to influence environmentally sustainable outcome for the disposal.

**ENVIRONMENTAL ASPECT/IMPACT REGISTER with  
LIFE CYCLE PERSPECTIVE ON BCEC & BCCES ACTIVITIES AND SERVICES**

Sl. No.	DEPARTMENT	ACTIVITIES/SERVICES	RESOURCES/MATERIALS	ASPECT	IMPACT	USE & MAINTENANCE/CONTROL MEASURES	END OF LIFE TREATMENT
14	<b>Engineering (BCCES)</b>	Provide Consulting Services for Project Feasibility Studies, Front End Design (FEED), Detailed Engineering & Design; Site Surveys	Paper Photocopying Office Supplies/ Stationery Materials	Waste generated like plastic, paper, carton/box, etc. Disposal of used paper	Soil / land contamination Decrease landfill space	Monitoring on the Monthly consumption of paper photocopying Implement Documents Retention & Disposal Schedule Provide adequate dust bins Always print double sided Reduce Paper usage Do not print if really not in need Keep soft or electronic copies as possible	Waste segregation-select recyclable paper and plastic materials; Recycle the waste generated; Reuse office supplies/stationery materials i.e., folder, box file; Dispose to waste recycling company for re-using and recycling purposes.
15			Electricity- Electronics equipment (computer, light, air-cooling system, printer, etc.)	Consumption of Electricity	Depletion of natural resources	Monitoring on the Monthly consumption of electricity Conduct periodic maintenance to all electrical equipment Awareness to all staff Ensure all electrical equipment are switched off when not in use Use good quality/standard equipment Conservation of energy	Ensure all electrical equipment are switched off when not in use.
			Vehicle	Consumption of fuel; Exhaust emissions;	Increase in ambient temperature; Air pollution, depletion of resources; Contamination of soil/environment	Carry out routine vehicle checks; Periodic maintenance of vehicles; Controlled use of vehicles (utilizing pool vehicles to go to site);	All vehicles to be maintained during life of. Disposed of according to local or international norms;

**ENVIRONMENTAL ASPECT/IMPACT REGISTER with  
LIFE CYCLE PERSPECTIVE ON BCEC & BCCES ACTIVITIES AND SERVICES**

Sl. No.	DEPARTMENT	ACTIVITIES/SERVICES	RESOURCES/MATERIALS	ASPECT	IMPACT	USE & MAINTENANCE/CONTROL MEASURES	END OF LIFE TREATMENT
16	Projects	Construction/EPIC	Project materials and equipment	Potential harm to environment if equipment and materials are not Eco/Environmental friendly or meet strict environmental laws and guidelines	Soil, Sea/water, Air pollution	Selection of materials and equipment to be maintained/controlled through BCEC procurement process	Reuse or scrap materials; All materials and equipment to be maintained during life of. Disposed of according to local or international norms; Comply with established procedure on Disposal of Surplus, Obsolete and Scrap Materials - end of life recycling; Waste Management Permit/Agreement with Ministry of Municipality and Environment Waste Treatment Department for Construction Wastes; Waste Management Permit/Agreement with Ministry of Municipality and Environment Waste Treatment Department for Waste Disposal of glass, paper, carton, wood, plastic, aluminum and steel; All products to be disposed of responsibly when they reach end of life - products and materials that reach end of life where BCEC does not have controlling influence BCEC will endeavour to influence environmentally sustainable outcome for the ddisposal.
17	Plant, Machinery & Vehicle (PMV)	Provides transport/vehicle use for all employees; Provides fleet unit to all projects- equipment/machineries; Overhead Crane Lifting; Lifting with fork lift truck; Drilling with drilling machine.	Light & Heavy Duty Equipment Machineries Vehicles	Consumption of electricity; Consumption of fuel; Exhaust emissions; CO2,CO,NOx,S02 and Particulate Matter; Heat released; Emission of contaminant air; Lubricant used in servicing the cranes; Disposal of web slings; Generation of waste oil filters; Grease	Increase in ambient temperature; Air pollution, depletion of resources; Contamination of soil/environment	Provide cooling fans; Adequate ventilation has to be provided; Switch off the equipment when not in use; Carry out routine vehicle checks; Periodic maintenance of vehicles; Controlled use of vehicles (utilizing pool vehicles to go to site); Ensure proper maintenance of overhead crane to consume minimal amount of electricity; Perform servicing of crane with competent personnel; Pre use checking of vehicle; Ensure that fork lift trucks are well maintained; Perform regular maintenance and servicing of the FLT; Use only required amount of grease and lubricant during servicing. Use minimum amount of water during drilling Provide material to soak up water from the ground; Daily equipment logbook to be maintained by the operator; Reporting of any observation from the equipment (especially increased emission of black smoke resulting from incomplete combustion); Regular servicing of equipment as per preventive measures; Daily pre-operation inspection (equipment checklist) to be done by operator; Use of approved methods of refueling at site (use of hand / motor pump).	Dispose of used web slings in approved disposal facilities; Dispose used oil filters in approved hazardous waste management facilities; Reference to the document detailing all wastes removed from site including domestic and sanitary waste; All materials and equipment to be maintained during life of. Disposed of according to local or international norms; Comply with established procedure on Disposal of Surplus, Obsolete and Scrap Materials - end of life recycling; Equipment & Vehicle used from completed project will be maintained to issue for mobilization to another or next projects; Sell for scrap to vendor or other recycling company for re-using; All products to be disposed of responsibly when they reach end of life - products and materials that reach end of life where BCEC does not have controlling influence BCEC will endeavour to influence environmentally sustainable outcome for the ddisposal.

 BLACK CAT Member of QIPCO		المنطقة الأسيوط للهندسة والإنشاءات د.م ENGINEERING & CONSTRUCTION W.L.L.		ENVIRONMENTAL ASPECT & IMPACT ASSESSMENT				BCEC PROJECT NO:			
						DATE: 12/08/2018		REV. NO.: 2			
										REF NO.: EAIA - BCEC and BCCES Office	
ASPECT/IMPACT ASSESSMENT PERFORMED BY: HSEQ REPRESENTATIVES											
PROJECT: BCEC & BCCES Office building											
DESCRIPTION: General office activities											
SI. No.	ACTIVITIES	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	PROB	SEV	RISK	MITIGATION / CONTROL MEASURES	PROB	SEV	RES RISK	
1	Use of electrical equipment (computer, light, air-cooling system etc.)	Consumption of electricity	Depletion of natural resource	3	3	Medium	Conduct periodic maintenance to all electrical equipment Give awareness to all staffs Ensure all electrical equipments are switched off when not in use. Use good quality/standard equipment	1	3	Low	
2	Usage of water at washrooms and pantry	Consumption of water	Natural resource depletion	3	3	Medium	Awareness to all staff Monitoring the use of water Frequent inspections to ensure no spillage occurs or leaks dealt with promptly (isolation shall be done until repaired)	1	3	Low	
3	Accidental water spill / leaks	Wastage of water	Depletion of natural resource	5	2	Medium	Maintanance of ablution facilities and kitchen taps Frequent inspections and reporting leaks promptly to ensure no spillage occurs	1	2	Low	
4	Used computers cartridges, CD's etc.	Disposal of materials	Environment pollution	3	3	Medium	Ensure proper disposal of cartridges and other used IT consumables	1	3	Low	
5	Cleaning with solvents / chemicals	Spill of cleaning agents	Soil contamination	3	5	Medium	Use of approved cleaning agents in use	1	5	Low	
		Disposal of containers	Soil / land contamination	3	3	Medium	Ensure that paint cans are disposed in approved hazardous disposal facilities.	1	3	Low	
6	Food Handling	Food waste disposal	Air and soil contamination	5	3	Medium	Adequate waste skips shall be provided in the office Periodic disposal of waste generated Waste skips shall be covered at all times	1	3	Low	

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ASPECT/IMPACT ASSESSMENT PERFORMED BY: HSEQ REPRESENTATIVES											
PROJECT: BCEC & BCCES Office building											
DESCRIPTION: General office activities											
SI. No.	ACTIVITIES	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	PROB	SEV	RISK	MITIGATION / CONTROL MEASURES	PROB	SEV	RES RISK	
7	Use of air conditioning units at office	Release of refrigerant gas	Air pollution Global warming / Ozone depletion	3	3	Medium	Periodic maintenance of all air conditioning equipments to ensure that no leaks to any hoses Use refrigerant of approved type	0.5	3	Low	
8	Use of equipment and machineries	Heat released	Increase in ambient temperature	3	2	Medium	Provide cooling fans Adequate ventilation has to be provided Switch off the equipments when not in use	1	2	Low	
9	Printing documents	Disposal of used paper	Land contamination	5	2	Medium	Recycle the waste generated Always print two side Do not print if really not in need Keep soft or electronic copies as possible Dispose to waste recycling company for re-using and recycling purposes	1	2	Low	
11	Use of stationery materials	Waste generated like plastic, paper etc.	Soil / land contamination	3	3	Medium	Waste management procedure Waste segregation-select recyclable plastic materials Disposal at designated areas Provide adequate dust bins	0.5	3	Low	
12	Replacing expired batteries used in computers and other portable devices	Disposal of used batteries	Soil / land contamination	3	3	Medium	Ensure that batteries are disposed in approved hazardous disposal facilities. Batteries shall be collected separately for disposal. Dispose to supplier/vendor who has recycling program for its product which is end-of-life e.g. computers, light bulb, etc.	1	3	Low	

 <b>BLACK CAT</b> <small>المنطقة السوداء للهندسة والإنشاءات د.م.م.</small> <small>ENGINEERING &amp; CONSTRUCTION W.L.L.</small> <small>Member of QIPCO</small>		<b>ENVIRONMENTAL ASPECT &amp; IMPACT ASSESSMENT</b>					<b>BCEC PROJECT NO:</b>				
						<b>DATE:</b> 12/08/2018		<b>REV. NO.:</b> 2			
						<b>REF NO.:</b> EAIA - BCEC and BCCES Office					
<b>ASPECT/IMPACT ASSESSMENT PERFORMED BY: HSEQ REPRESENTATIVES</b>											
<b>PROJECT: BCEC &amp; BCCES Office building</b>											
<b>DESCRIPTION: General office activities</b>											
SI. No.	ACTIVITIES	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	PROB	SEV	RISK	MITIGATION / CONTROL MEASURES	PROB	SEV	RES RISK	
13	Painting office and other areas	Spillage from paint containers	Land/soil contamination	3	5	Medium	Provide drip trays for paint cans. Make sure the paint cans are closed tightly	1	5	Low	
14		Disposal of paint cans	Land/soil contamination	3	3	Medium	Ensure that paint cans are disposed in approved hazardous disposal facilities.	1	3	Low	
15	Sewage water from kitchen and toilets	Water water disposal	Soil /land contamination	5	3	Medium	Disposal shall be done through municipal drainage system Do not dispose food waste through general drainage system	1	3	Low	
16	Smoking	Release of toxic smoke	Air pollution	3	3	Medium	Provide designated smoking area Adequate ventilation must be given Cigarette buds shall be disposed properly	1	3	Low	
17	Closing of doors, moving of furnitures	Annoying sounds	Noise pollution	3	3	Medium	Hydraulic door closer shall be installed Provide lubricants to door hinges	0.5	3	Low	
18	Vehicle movement	Emission of contaminant air, use of fuel	Air pollution, depletion of resources	5	3	Medium	Carry out routine vehicle checks Periodic maintenance of vehicles Controlled use of vehicles (utilizing pool vehicles to go to site)	1	3	Low	

<b>Risk Assessment Matrix</b>						
		<b>Probability</b>				
		10	5	3	1	0.5
<b>Consequences</b>	10	HIGH	HIGH	MEDIUM	LOW	LOW
	5	HIGH	MEDIUM	LOW	LOW	LOW
	3	HIGH	MEDIUM	LOW	LOW	LOW
	2	MEDIUM	MEDIUM	LOW	LOW	LOW
	1	MEDIUM	LOW	LOW	LOW	LOW

# PROCEDURE

HEALTH, SAFETY & ENVIRONMENT (HSE)

## ENVIRONMENTAL AND WASTE MANAGEMENT PLAN





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**1.0 INTERNAL CONTROLS**

**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this HSE Procedure.

The **Health, Safety, Environment & Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

**1.2 APPROVAL**

This procedure and any amendments made thereto; require the following approvals:

**Authority**

**Date**

  
HSEQ Manager

08/05/2019

  
Chief Executive Officer

08/05/2019

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed .....



Date .....

08/05/2019



## 2.0 PURPOSE

The purpose of this document is to describe the management processes used to effectively execute all legal and Company Environmental Plan requirements associated with all Company (Black Cat) head office and site project operations. This management plan aids the standardization and ongoing improvement of Black Cat methods of execution and delivery by facilitating the following:

- Leadership (Senior Management) and commitment.
- Assignment of functional positions to Black Cat personnel.
- Assignment of authority levels for Black Cat personnel.
- Identification of Black Cat corporate documentation that has relevance to this plan and specific elements to be implemented.

The Environmental Management Plan describes the environmental management policies, procedures and responsibilities for the systematic approach to environmental management as it relates to the execution of the all Black Cat controlled activities. It also outlines and specifies the mitigation measures planned to reduce the environmental risks associated with activities undertaken by Black Cat and to ensure compliance with the local and international laws and regulations and compulsory management measures.

Black Cat will ensure that this Environmental Management Plan (EMP) is communicated to all relevant personnel, and that this plan is strictly observed and complied with by Black Cat and its subcontractors to ensure compliance with applicable laws, legislation, regulations and requirements of the State of Qatar.

## 3.0 SCOPE

This plan applies to all Black Cat offices and all project activities that have the potential to impact on the environment and health & safety of Black Cat employees, subcontractor personnel and the local community. This includes, but is not limited to, the following issues:

The philosophy of the waste management can be summarized by these three requirements

- The waste management must encourage reuse, reduce or recycle of the waste.
- The waste generator is responsible for his waste till the destination.
- Segregation of Hazardous, Non-Hazardous and Inert waste in different skips.

The **3R** target, **R**ecycling, **R**euse and **R**educe shall be enforced. Some solutions exist in Qatar to recycle waste, so experiences must be shared and promoted.

This EMP describes:

- a) The existing environment in all proposed operations.
- b) The potential environmental impacts associated with proposed project activities.
- c) The assessment of the potential environmental impacts associated with project activities.
- d) The management measures that will be implemented to avoid or minimize the actual/potential environmental impacts identified for each aspect of operations.
- e) Relevant environmental legislation.
- f) The operational management plans incorporating their objectives, targets and controls.
- g) Waste water and services minimization;



- h) Classification and segregation of waste at source;
- i) Collection of waste in appropriate containers or identified barricaded areas for daily pick-up and transport to respective centralized storage areas;
- j) Storage of waste generated by Company supplied material in temporary storage area for recycling and/or final disposal;
- k) The transportation, off-site handling and tracking of waste to licensed treatment / recycling / disposal facilities by an approved and licensed contractor.

#### 4.0 AIMS OF THE PLAN

The aims of the plan are to:

- Demonstrate that Black Cat understands how the proposed operations will interact with the environment.
- Demonstrate that Black Cat has suitable performance objectives, standards and measurement criteria.
- Demonstrate that environmental effects and risks are eliminated or controlled to an As Low as Reasonably Practicable (ALARP) level.
- Ensure that systems are in place to eliminate or minimize the environmental effects
- Ensure that commitments made in the EP are implemented.

#### 5.0 OBJECTIVES

Environmental Objectives and Targets based upon identified environmental needs and requirements associated with Black Cat operations (Table 1). The key environmental objectives for the project are as follows:

- Prevent unplanned impacts to the environment
- Provide a uniform approach to the management of environmental requirements across all operational activities.
- Establish performance requirements to ensure environmental compliance.
- Define responsibilities and accountabilities for all personnel to ensure effective implementation of the environmental management system requirements.
- Identify, assess and control all environmental hazards and risks within our control.
- Ensure processes for the effective management and reporting of environmental incidents.
- Ensure processes are in place for the effective management of impacted areas.
- Minimize the amount of waste generated
- Maximize the amount of material which is sent for reuse, recycling or reprocessing
- Segregate the waste at source
- Comply with Qatar Environment law and regulations
- Comply with ISO 14001:2015 requirements



## 6.0 DEFINITIONS

Term	Definition
ALARP	As Low as Reasonably Practicable
AUDIT	A systematic and independent examination or review of all or part of a Project or operation to determine whether activities and related results comply with COMPANY established systems, and whether these systems have been implemented effectively
COMPETENT PERSON	A person who has acquired through training, qualification, or experience, or a combination of these, the knowledge and skills, qualifying that person to perform specified tasks
CONSEQUENCE	The outcome of an event expressed qualitatively or quantitatively, being a loss, injury, disadvantage or gain. There may be a range of possible outcomes associated with an event
DEBRIS	Unusable or unwanted construction waste material
DOMESTIC WASTE	Unusable or unwanted construction waste material
ENVIRONMENT	Surroundings in which an organization operates, including air, water, land and natural resources, flora, fauna, humans and their interrelation
ENVIRONMENTAL ASPECT	Element of an organization's activities or products or services that can interact with the environment
ENVIRONMENTAL IMPACT	Any change to the environment whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects
EMP	Environment Management Plan (this document) (EMP) Document that describes the process that an organization will follow to manage its environmental aspects, demonstrate compliance with applicable regulations and minimize environmental impacts
ERP	Emergency Response Plan
ENVID	Environmental Issues Identification
HAZARD	A source of potential harm or a situation with a potential to cause loss
HAZARDOUS CHEMICAL/MATERIAL	A chemical or material which if enters the natural environment can cause environmental damage / harm



Term	Definition
HAZARDOUS WASTE	Any waste exhibiting one or more of the following properties <ul style="list-style-type: none"> <li>• Flammability</li> <li>• Toxicity</li> <li>• Environmental harm</li> <li>• Corrosivity</li> <li>• Reactivity</li> </ul> Hazardous waste potentially constitutes high risk to people and environment.
HAZID	Hazard Identification Workshop
HAZOB/HAZOP	Hazard Observation / Hazard Operability
HES/HSE	Health, Environment and Safety synonymous with Health Safety and Environment
HSEMS	Health, Safety and Environment Management System
INCIDENT	An event or situation which results in damage or has the potential to cause injury or illness, financial loss or liability or environmental impact
INJURY	Means any injury or medical condition sustained by any person in the workplace that requires or may require first aid or medical treatment
JOB HAZARD ANALYSIS (JHA)	An analysis of the tasks or activities undertaken in a job or process to ensure any risk associated are identified and controlled
MME	Ministry of Municipality and Environment
MSDS	Materials Safety Data Sheet/synonymous with SDS
NON-HAZARDOUS WASTE	Waste that does not have the properties of toxicity, ignitability, reactivity or any other characteristics that may cause harm to people and environment or require special handling and disposal precautions.
PRACTICABLE	Means reasonably practicable having regard to, among other things, local conditions and circumstances (including costs) and to the current state of technical knowledge
PRE-COMMISSIONING AND COMMISSIONING	Testing processes or incomplete work requiring construction completion, including testing of system components for continuity and ability to withstand operating conditions
PROJECT	The product of all work, including CONTRACTOR'S work under the Contract
RECORDABLE INJURIES	Includes the following injury classifications: lost time, restricted duties and medical treatment injuries



Term	Definition
REPORTABLE INCIDENTS	Incidents that require reporting to a regulator or other authority
RISK	The probability of something happening that will have an impact upon objectives. It is measured in terms of consequences and likelihood
RISK MANAGEMENT	The culture, processes and structures that are directed towards the effective management of potential opportunities and adverse effects
SAFETY	A state in which the risk of harm (to persons) or damage is limited to an acceptable level
SDS	Safety Data Sheet (acronym replaces MSDS)
SUBCONTRACTOR	Any person of any tier engaged by CONTRACTOR or another subcontractor to CONTRACTOR, to provide any of the Work, including vendors of CONTRACTOR
LIFE CYCLE	<p>Consecutive and interlinked stages of a product or service system, from raw material acquisition or generation from natural resources to final disposal. Life cycle stages include acquisition of raw materials, design, production, transportation/delivery, use, end-of-life treatment and final disposal.</p> <p>Life Cycle perspective – According to ISO 14001:2015, is a systematic approach to environmental management that can provide top management with information to build success over the long term and create options to the organization for contributing to sustainable development by controlling or influencing the way the organization's products and services are designed, manufactured, distributed, consumed and disposed by using a life cycle perspective that can prevent environmental impacts from being unintentionally shifted elsewhere within the life cycle.</p>



## 7.0 NEEDS & EXPECTATIONS OF INTERESTED PARTY

Black Cat understands the needs and expectation related to environment health and safety of the internal and external interested parties.

Internal interested parties	External interested parties
a) Black Cat employees	a) Customers/Clients
b) Contractors/Subcontractors workers	b) Supply chain partners- Subcontractors and vendors, service suppliers/providers
c) Joint Venture employees	c) Government agencies/regulatory bodies
	d) Neighbors/other tenants/building owner

The needs and the expectations of the determined interested parties as listed above can become our Compliance obligations which we need to be always in compliance and shall also evaluate in order to perform well and meet their expectations.

Black Cat shall consider the relevant needs and expectations of interested parties that are made known to us or have been disclosed by them, when taking decisions or modifying activities related to its environmental performance and when there is likelihood that the interested party might get affected by this. The needs and expectations become mandatory when they have been incorporated into laws, regulations, permits and license condition by regulatory body.



## 8.0 QHSE POLICY

Black Cat QHSE policy outlines the management expectation and commitment and is posted at visible areas in our office.

**QUALITY, HEALTH, SAFETY & ENVIRONMENTAL POLICY**  
**BLACK CAT ENGINEERING & CONSTRUCTION**

Our objective is to create a sustainable business in which continuous improvement and excellence are applied to everything we undertake.

We are committed to providing high standards of Quality in Design & Engineering, Procurement, Construction, Installation and Commissioning services to ensure:

- customer satisfaction with required specifications
- on time delivery through efficient utilization of resources
- safe working practices to prevent injury or adverse health effects
- identification and management of risk
- conservation of resources
- protection of our environments through identification of aspects and impacts
- compliance with applicable legislation & regulations that relate to our activities

Our success will be achieved through clear, visible leadership throughout the company with the active involvement of all employees that develops a QHSE culture that promotes a positive behavior for effective management of risk while encouraging innovation and improvement. Every employee has the moral and legal obligation to ensure the safety of themselves and those working with them.

The senior management team are committed to and responsible for providing the necessary organization, systems and processes, resources, training and awareness programs to achieve our objectives.

Our progress toward achieving leading performance in QHSE will be measured by leading and lagging indicators and reported with reference to our annual objectives and targets.

The development and implementation of our QHSE systems and procedures shall be subject to both internal and external audit for compliance in accordance with our certification to the current version of ISO 9001; OHSAS 18001 (ISO 45001) & ISO 14001.

This policy will be displayed prominently at all work places and will be reviewed periodically.



**PAOLO BORCHETTA**  
CHIEF EXECUTIVE OFFICER

**04-06-2018**

DATE



COMPANY SEAL

**BLACK CAT** | الفط الأسود للهندسة والإنشاءات ذ.م.ج.  
ENGINEERING & CONSTRUCTION W.L.L.  
Member of **QIPCO**  
HOLDING

BCEC/QHSE-001/REV.10/04.06.2018



## 9.0 LEADERSHIP & COMMITMENT

Black Cat Management Team is firmly committed to its Quality, Health, Safety and Environmental (QHSE) Policy.

To ensure this commitment, Top management shall:

- Ensure that QHSE Policy is endorsed by senior management of the Company and communicated to all Black Cat employees.
- Provide the resources to ensure that the project has the required equipment and personnel to complete each task in a safe and timely manner without adverse impact on existing operations.
- Implementing a scheduled program of company-wide environmental awareness.
- Ensure environmental compliance in all obligations, laws and regulations.
- Monitor its environmental management performance.
- Feedback from all employees is acted on – this encourages and supports employee participation HSE initiatives for continual improvement.
- Ensure that HSE issues are included in the agenda of all management review meetings.

## 10.0 ROLES & RESPONSIBILITIES

### 10.1 SITE MANAGER

Project Manager (PM) is the overall responsible person of the project to ensure client and Black Cat waste management procedures are implemented effectively.

### 10.1 DEPARTMENT MANAGER

Department Managers are the overall responsible person to ensure this waste management procedure is implemented effectively within the departments.

### 10.2 SUPERVISOR

It is the responsibility of the site Supervisor to identify the type of waste, segregate and dispose the waste generated as per client/ Black Cat waste management procedure. He shall also educate his team members to ensure that they follow good housekeeping practices and wastes are disposed as per the procedure.

### 10.3 EMPLOYEES/WORKFORCE

It is the responsibility of all Black Cat employees to keep the work area clean and safe by segregating the waste and disposing at designated waste bins. All employees shall ensure that they fully comply to the procedure and follow waste management process.

### 10.4 CORPORATE HSE MANAGER

HSE Manager shall be responsible for ensuring that the requirements of this procedure are followed at site and offices by providing guidance and assistance to the operation.

### 10.5 HSE ADVISORS/HSE OFFICERS

Carry out inspections to waste disposal areas

- Provide training to employees to make aware on the importance of waste segregation and disposal
- Ensure the waste bins are emptied frequently
- Adequate signage's and warnings provided at waste disposal areas



## 11.0 ENVIRONMENTAL OBJECTIVES

**TABLE 1: ENVIRONMENTAL OBJECTIVES MATRIX**

Objectives	Targets (Measurable)		Management Process	Relevant Documentation
	Indicator	Target		
Prevent unplanned impacts to the environment	Environmental incidents resulting in a measurable environmental impact	Zero Impact to the environment Close out of any corrective action associated with impact incidents Completed inspections and audits within agreed time frames	Implementation of plans procedures and policy both BCEC and Client as required and according to contractual arrangements	HSEQ BCEC Policy Statement BCEC Reporting and Investigation Procedure BCEC Risk Management Procedure ISO 14001:2015
Provide a uniform approach to the management of environmental requirements across all operational activities.	Knowledge based training to all personnel required to work under this EMP	100% of personnel training in EMP requirements Zero Impact to the environment	Implementation of training plans	BCEC training standard BCEC EMP BCEC Project specific training plan ISO 14001:2015
Establish performance requirements to ensure environmental compliance.	Agreed set of targets and monitoring and measuring criteria	Zero Impact to the environment Close out of any corrective action associated with impact incidents Completed inspections and audits within agreed time frames	Leadership HSE KPI BCEC Corporate performance measures	BCEC Policy Statements BCEC Performance Measure Procedure HSEQ Manual ISO 14001:2015

Objectives	Targets (Measurable)		Management Process	Relevant Documentation
	Indicator	Target		
Define responsibilities and accountabilities for all personnel to ensure effective implementation of the environmental management system requirements.	All current PD's to include responsibilities regarding HSEQ Department annual objectives to include HSEQ Project HSEQ plans to include reference to Environmental responsibilities	Zero Impact to the environment 100% of personnel training in EMP requirements	HR Positions descriptions QMS Objectives for 2019 completed HSE plans and sub-contractor management	BCEC QMS Manual BCEC Measuring and Monitoring BCEC Objectives BCEC Contractor Management Guidelines BCEC Project HSEQ Plans BCEC Project Operations Execution Plans
Identify, assess and control all environmental hazards and risks within our control.	Internal External audits process and findings Measure and monitor Environmental Performance KPI Environmental Aspects and Impacts Registers	Zero Impact to the environment Close out of any corrective action associated with impact incidents Completed inspections and audits within agreed time frames	Internal and external audit and review process Internal performance monitoring	BCEC Internal and External Audit Plan BCEC Environmental Aspects and Impacts Register
Ensure processes for the effective management and reporting of environmental incidents.	Performance monitoring Incident reporting process/action close out	Zero Impact to the environment	Set KPI and performance criteria Action tracking register	BCEC Environmental and Waste Management Plan BCEC Incident Reporting and Investigation
Minimize the amount of waste generated	Measurement and monitoring process	Zero Impact to the environment	Segregation at source and recycling contractor dealing with waste at HO	BCEC Environmental and Waste Management Plan BCEC Measuring and Monitoring

Objectives	Targets (Measurable)		Management Process	Relevant Documentation
	Indicator	Target		
		Close out of any corrective action associated with impact incidents	Project requirement according to client and BCEC process – segregation and disposal	BCEC Objectives BCEC Contractor Management Guidelines BCEC Project HSEQ Plans BCEC Project Operations Execution Plans
Maximize the amount of material which is sent for reuse, recycling or reprocessing	Measurement and monitoring process	Zero Impact to the environment	Segregation at source and recycling contractor dealing with waste at HO Project requirement according to client and BCEC process – segregation and disposal	BCEC Environmental and Waste Management Plan BCEC Measuring and Monitoring BCEC Objectives BCEC Contractor Management Guidelines BCEC Project HSEQ Plans BCEC Project Operations Execution Plans
Segregate the waste at source	Measurement and monitoring process	Zero Impact to the environment	Segregation at source and recycling contractor dealing with waste at HO Project requirement according to client and BCEC process – segregation and disposal	BCEC Environmental and Waste Management Plan BCEC Measuring and Monitoring BCEC Objectives BCEC Contractor Management Guidelines BCEC Project HSEQ Plans BCEC Project Operations Execution Plans

Objectives	Targets (Measurable)		Management Process	Relevant Documentation
	Indicator	Target		
Comply with Qatar environment law and regulations	Audit and review against set criteria	Zero Impact to the environment	Audit process covers internal and external requirements including laws and relevant standards	BCEC Internal and External Audit Plan BCEC Environmental Aspects and Impacts Register
Comply with ISO 14001:2015 requirements	Audit and review against set criteria	Zero Impact to the environment ISO Recertification Process	Audit process covers internal and external requirements including laws and relevant standards	BCEC Internal and External Audit Plan BCEC Environmental Aspects and Impacts Register BCEC Environmental and Waste Management Plan BCEC QMS Manual BCEC Measuring and Monitoring BCEC Objectives

## 12.0 COMPLIANCE OBLIGATIONS

12.1 The Company determines, at a sufficiently detailed level, the compliance obligations and legal & other requirements that are applicable to its environmental aspects, and how they apply to the organization and what needs to be communicated. The Company shall take these compliance obligations, legal requirements and other requirements into account when establishing, implementing, maintaining and continually improving its Environmental management systems.

### Requirements:

- Law No. 30 of 2002 on Environmental Protection
- Public Hygiene and Cleaning Law no. (18) of the year 2017
- BCEC HSE Policies
- ISO 14001:2015 Environmental Management Systems (EMS) – Requirements with guidance for use.

12.2 The HSEQ Manager and/or HSEQ Department is responsible for gathering relevant compliance obligations applicable to the environmental aspects of Black Cat, and for compiling them in a Register/Matrix (Ref. BCEC/IMS/007/F-001/REV.XX-Compliance Obligations, Legal Requirements and Other Requirements Matrix) and updating this register from time to time. This document register/matrix is provided to help Black Cat employees at all levels understand the Company's Environmental obligations and regulatory requirements.

The HSEQ must ensure that information sent regarding any changes in the compliance obligations and legal requirements must be updated immediately, communicated and notified to all relevant interested parties and is responsible to keep track the changes in other requirements.

## 12.3 Maintain, Review and Management of Change

**HSEQ Manager** with the assistance of Department Managers shall follow for any changes in compliance obligations in Qatar Legal Portal Al-Meezan web site: [www.almeezan.qa/Default.aspx?language=en](http://www.almeezan.qa/Default.aspx?language=en), and other sources of notification, to ensure that Compliance Obligations & Other Requirements Matrix is up to date.

The changes in compliance obligations can be tracked by:

- Government Official notification
- Notifications published in local print publications

To identify the changes in other requirements such as Clients HSE guideline, **HSE Officer / HSE Engineer** shall discuss with Client's HSE department. If there is any change in older version, the new version must be superseded, and all concerned employees and contractors shall be informed of any changes.

A six (6) monthly review of the matrix details is implemented to ensure that it is updated to reflect any changes. Unless there is a government notification that is promulgated during the six (6) month review period that requires our compliance and necessary update shall also be done in the matrix. BCEC and BCCES Compliance Obligations, Legal and Other Requirements with reference to the renewal of service contracts/agreements of the Company with industrial sites (i.e., Dukhan, Mesaieed Industrial City (MIC), Ras Laffan Industrial City (RLIC) for waste disposal and Ras Laffan Workshop and Laydown area).



Changes to compliance obligations and other requirements that may have an impact on BCEC and/or BCCES operations will be communicated immediately to the Heads of Department for review and action and will also be discussed during scheduled meetings- e.g. management review meeting.

Procedure BCEC/IMS/007/REV.XX describes the process to identify compliance obligations, legal and other requirements.

### 13.0 ENVIRONMENTAL MANAGEMENT

A series of Operational Environmental Strategies (OES) have been established for the management of identified environmental aspects. For each OES objectives, targets and controls have been identified. The OES are outlined in Section 11 of this plan. These strategies are aligned with the BCEC EMS policy and procedures and Qatar environmental laws.

#### 13.1 ENVIRONMENTAL LIFE CYCLE

The selected activities, products, and services have some effect on the environment, and this can occur in any life cycle stage of any activity, product, or service, i.e., from purchasing and distribution to usage and disposal. Such impacts can be local, regional, or global, long term and short term, with different levels of significance. The relationship between environmental aspects and impacts is one of cause and effect.

With the understanding of environmental impacts, the Company shall implement controls at each stage of Life Cycle appropriately. The organization can consider those stages in the life cycle over which it has the greatest control or influence as these may offer the greatest opportunity to reduce resource use and minimize pollution or waste.

- Set environmental considerations
- Set purchasing requirements Our influence over our suppliers is controlled by our corporate requirement to use only those suppliers that have been approved through our corporate supplier/subcontractor approval process and client's vendors approval list.
- Implement environmental protection controls
- Provide advisory/information on proper use of material to reduce environmental concerns
- Set disposing requirements



### LIFE CYCLE MODEL



Environment aspect and impact evaluation shall be done and must prepare a register in life cycle perspective.

### 13.2 ENVIRONMENTAL IMPACTS AND ASPECTS RISK REGISTER

13.2.1 The hazard identification process (HAZID) and/or environment issues identification (ENVID) incorporates environmental impact and aspects identification and provides initial input into BCEC Environment Impacts and Impacts Risk Register-BCEC/HSE/QS-037/ REV.XX. The Environmental Risk Register is also referred to as the Aspects and Impacts Register.

- Environmental Aspect: element of an organization's activities or products or services that can interact with the environment.
- Environmental Impact: any change to the environment whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects. In other words, a significant environmental aspect has or can have a significant environmental impact.

A significant environmental aspect has or can have a significant environmental impact. The main environmental aspects are:

- Discharge(s) to the local environment
- Accidental liquid or solid discharges to the environment.
- Disturbance to flora and fauna.
- Waste disposal.
- Disruption to sensitive Ecosystems
- Disruption to common local animal species habitats



13.2.2 Reviews of environmental aspects are conducted where:

- Initial reviews are carried out regularly during scheduled Monthly HSE Meetings to determine what the environmental aspects are, taking into consideration the inputs and outputs associated with the current and relevant past activities, products or services.
- Intermediate reviews by the *HSEQ team* take into consideration normal and abnormal operations and potential emergency conditions.
- Continual reviews of environmental aspects shall be conducted by the top management during Management Review Meeting (MRM) as part of the agenda in management review in order to maintain continual improvement, suitability and effectiveness of the EMS.

Referenced to Procedure no. BCEC/HSE/CP/024-REV.XX-Environmental Aspects and Impacts

13.2.3 This risk assessment is shown in the Environmental Risk Register (Appendix A). This is a live risk register and will be subject to update and periodical reviews by BCEC to ensure currency as system HAZID/ENVID and major sub-contract HAZID/ENVID are completed. The following steps illustrate the process for environmental risk management:

- a) Pre-Identification of Aspects and Potential Impacts - Collating information to assist with identification of aspects and potential impacts.
- b) Environmental Impact (Risk) Analysis - Quantitative and qualitative assessment of risk of significant impact (i.e. likelihood of occurrence and severity of consequences).
- c) Control Measures - The nomination of control measures to eliminate or minimize the potential of impact to the environment (to the level of As Low as Reasonably Practicable (ALARP)).
- d) Residual Risk – Assessment of the risk to the environment with the nominated control measures in place. This residual risk will be reviewed periodically or in the event of an incident or an adverse audit finding, and the control measures supplemented as required to maintain the residual risk ALARP.
- e) Environmental Risk Register - A review of the Environmental Risk Register will be conducted:
  - Prior to mobilization (commencement of new project).
  - In the event of a change to the project scope of work.
  - Where material change to plant equipment, process and procedures occur.
  - In the event of an environmental incident or near miss, or
  - To address an adverse environmental audit outcome.

Prior to the commencement of major project activities, BCEC will conduct HAZID Workshop(s) incorporating a review of environmental aspects involving key stakeholders. During this review significant environmental impacts will be identified, assessed and appropriate control measures determined to manage residual risks.



## 14.0 WASTE MANAGEMENT

Waste management or waste disposal is all the activities and actions required to manage waste from its inception to its final disposal. This includes amongst other things, collection, transport, treatment and disposal of waste together with monitoring and regulation. It also encompasses the legal and regulatory framework that relates to waste management encompassing guidance on recycling etc.

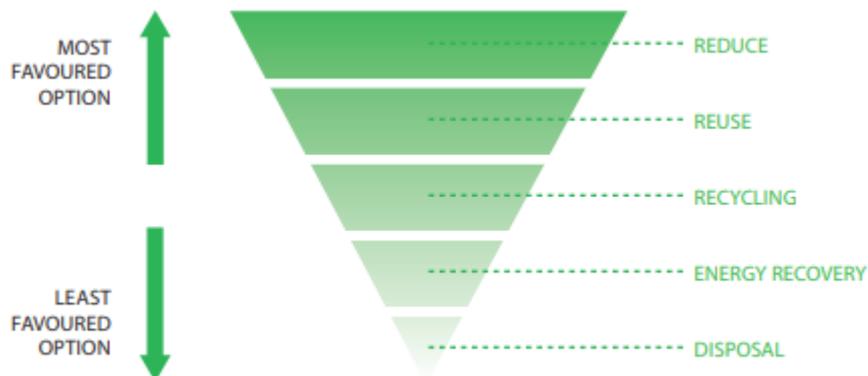
The product life cycle begins when raw materials are extracted from the earth and ends when the materials from the products are reused, recycled, recovered or discarded. The aim is to close the loop and recycle materials back into the manufacturing process. This will conserve the earth's mineral resources, save energy (by reducing mining and transportation) and reduce waste.



### 14.1 WASTE MANAGEMENT HIERARCHY

Hierarchy of waste management indicates an order of preferences for action to reduce and manage the waste generated.

The waste hierarchy illustrates that the most effective way in which to reduce waste production is to design it out. An example of this in an office could be the use of electronic document control, rather than reliance on hard copy. Disposal should always be a last resort.



## 14.2 METHODS OF WASTE DISPOSAL

There are many methods available to dispose off waste and the most commonly used methods about waste management are:

1. Landfills
2. Incineration/Combustion
3. Recovery and recycling
4. Composting
5. Recover Energy (waste to energy)

## 14.3 PLANNING

Black Cat plan and aims to recycle Cardboard, Used oil, Plastic, Plastic drums, Wood waste. With regards to hazardous waste, a proper temporary hazardous storage approved by Regulators shall be implemented. Continual monthly environmental reviews in order to achieve the right standard for such waste storage areas as explained in Manual.

Concerning hazardous waste disposal, the hazardous waste that can be recycled shall be sent to recycling facilities that are available within Qatar. Hazardous waste that cannot be recycled shall be sent Mesaieed Industrial City (MIC) Hazardous Waste Treatment Centre (HTWC) if the waste can be treated.

If the treatment facility in MIC doesn't have a facility to treat some Hazardous waste, then alternative facilities such shall be considered until further treatment or disposal.

Non-hazardous waste like wood waste, insulation waste, and domestic waste can be dumped into authorized locations waste management facility.

Grit blasting activity is carried out in workshop only. If any grit blasting activity is carried out in Temporary Facility, then special precautions shall be taken to avoid spill of grit in the surrounding area and the activity shall be carried out in enclosed area to contain sand and dust emissions. If there is any spill of grit, the surrounding area shall be cleaned, and the waste shall be disposed as per requirements.

Welding activity is one type of activity that generates metal waste / electrode waste. Welders shall be instructed to carry a container to collect or dispose electrodes instead of disposing on the ground. This used electrode waste shall be considered as metal waste and shall be disposed as metal waste as per local requirements.

With regards to temporary waste storage facilities, the area must be recovered to its initial state at the end of the Project and due diligent inspection shall be carried out with COMPANY, CONTRACTOR and Sub-contractor representative before handing over the temporary storage facilities.

Training on Waste Management and use of required PPE shall be provided to the workers.

## 14.4 HAZARDOUS WASTE HANDLING

The control of the hazardous substances includes registration of the chemicals, proper storages, proper PPE while handling, training, sampling activities, transportation, loading and disposal of containers and surplus chemicals.



- All chemical characteristics and requirements are detailed in the MSDS, therefore, Material Safety Data Sheet (MSDS) must be easily available in the area of each chemical.
- The registration of the chemical with their MSDS shall be done through monthly environmental reviews. In addition, MSDS shall be attached to every method statement of works requesting the use of chemicals. The selection is done by user of Chemicals. Black cat approves the commenting /approving the method statement. The risks linked with the use of the chemicals are assessed during the review of the method statement. The required PPE to protect the workers and the way to handle are detailed in the Job Safety Analysis.
- Surveys of all chemical storages shall be done through monthly environmental reviews or specific surveys, to ensure that the storage comply with the standards.
- Factory-made spill kits must be made available at all permanent chemical storage areas. Indeed, sawdust is not appropriate to absorb hardeners - spontaneous combustion can occur, therefore factory made kits shall be made available at all chemical storage areas. A program of weekly check shall be implemented to ensure that kits are ready to be used in the event of emergency.
- Training on handling hazardous material and the use of required PPE shall be provided to the workers involved with the particular activity.
- The transportation of chemicals must comply with Qatar regulations. A safety talk must be delivered to drivers before departure, reminding the emergency phone numbers and the actions to take in case of trouble. Every safety talk shall be based on the information available in the MSDS.
- Spark arrestor must be installed on vehicles going into restricted area (gas-in area); hazard signs must be displayed on the trucks, in order to warn other surrounding vehicle.
- Sampling activities must be witnessed by Black cat representatives to ensure compliance with MSDS.
- The activities of chemicals loading must be described by a method statement and a job safety analyses. Vehicles refueling operations shall be carried out only at designated refueling areas.
- Refueling areas shall be paved and bund wall on four side or connected to a retention area. They shall be safe in terms of position; for instance, they shall be located at appropriate distance (30m minimum) from any hot work activity.
- Tanker delivery hose shall be checked for residual fuel from last fueling operation. If there is residual fuel, the delivery hose shall be handled accordingly. Delivery pipes shall be properly connected. Couplings shall be appropriate, shut off valves easily accessible. User shall ensure the integrity of the terminal and in-line connections. An operator must control the dispenser at all times.
- All waste generated by the use of the chemical/Oils such as container and surplus, will be disposed as per the legal requirements and Waste Management Program.

#### 14.5 NON-HAZARDOUS WASTE HANDLING

All construction waste will be disposed at suitable land fill areas and food waste generated at site will be disposed at our main designated food waste disposal bin.

- Enough bins and skip shall be provided at all suitable locations.



- Non – hazardous waste shall be collected separately in proper skips and sent it to disposal facilities per the advice of HSE or Environment department and waste will be removed from work place frequently.
- All non-hazardous waste generated to be quantified by Black Cat’s HSE personal and shall be included in the HSE weekly report submitted to HSE department weekly.
- Black Cat shall follow the temporary storage of waste retention period.
- Temporary (daily) storage / collection points will be located away from main construction activities and chemicals to prevent the ignition / fire;
- Fire fighting equipment will be provided near the storage/collection areas;
- The storage area will be readily accessible to collection vehicles;
- The storage area will be of adequate size and capacity to accommodate the required number of containers, consistent with the waste generation routine and collection schedules;
- Containers and storage areas will be cleaned on a regular basis;
- Waste material will be removed to the disposal site at the earliest opportunity to prevent inventory build up;
- Waste collection frequency will be in line with the prevailing Client health and safety regulations.
- Waste storage areas shall be inspected daily.
- Waste collection area shall be clearly identified, and warning signs shall be posted.
- Separate waste collection areas shall be available for metal, wood, plastic and general waste.
- Waste disposal record shall be maintained by HSE department.

## 14.6 WASTE STORAGE AND DISPOSAL

### 14.6.1 WASTE SEGREGATION

Hazardous and non-hazardous waste shall be stored separately. Therefore, the waste shall be segregated at the source. Proper labeling and pictorial signages shall be given to the skips provided for collecting waste. Wooden materials shall be properly stacked to maximize ability to reuse them.

When we segregate waste, there is reduction of waste that gets landfilled and occupies space, air and water pollution rates are considerably lowered. At office, separate waste skips shall be provided at each floor to dispose paper, plastic and food waste. The process of waste segregation should be explained to all Black Cat employees. Awareness shall be created amongst the staff to help make the process easier.

### 14.6.2 WASTE DISPOSAL

Waste receptacles shall be provided within the offices and project sites for collection of waste. Waste storage areas at site shall be barricaded and necessary warning signs shall be posted. Waste shall be removed periodically, never allow the skips to overflow and all waste skips shall be covered properly.

Wastes shall only be disposed at approved disposal areas and the evidence of disposal of waste shall be documented.

- All wastes shall be collected in separate containers based on its hazardous nature
- All hazardous waste materials shall be stored under shaded and ventilated areas in appropriate containers and it should be disposed – of as per the methods stipulated in



Safety Data Sheets (SDS), complying to local environmental rules & regulations (MoE) and client's regulation.

- Appropriate Personal Protective Equipment shall be used while handling hazardous and non-hazardous wastes.
- Provide signage's for hazardous and non-hazardous waste storage areas to indicate the designated areas.

Waste materials generated by operational or other activities shall normally require some form of temporary storage, pending reuse/recycling or transport to final disposal location. The Company shall ensure that suitable and sufficient temporary storage is provided to accommodate waste from their operations with client approval.

Each Black Cat facility shall provide a designated and fenced temporary waste storage area where wastes are stored and later transported to final disposal location (by Black Cat or approved waste management service contractor). The waste storage area shall include the following features:

- Clear demarcation into hazardous and non-hazardous areas with clear signage to indicate the designated areas
- All wastes shall be segregated into Hazardous and Non-Hazardous, with clear markings on all receptacles specifying which type of waste they contain and the hazards with a view to assist in emergency response in case of accidental human contact, spillage or other loss.
- Liquid hazardous waste shall only be stored in secure, bounded areas, with an impervious base.
- The storage area shall be open to the air, but hazardous wastes shall be protected from the elements by a protective cover. Sealed drums should be stored in shaded areas to avoid risk of ballooning or pressure build-up.
- Suitable spill cleans up materials shall be kept available on or close to the designated storage area, in order to deal with any accidental spillages/leakages.
- Emergency shower/eyewash facilities shall be provided at strategic location(s).
- Fire protection and first aid equipment shall be provided.

An up-to-date inventory of all wastes temporarily stored on the site shall be maintained, together with relevant health and safety information and the procedures to be followed in the event of an emergency.

All wastes being transferred shall be suitably packed in secure sealed containers, with the contents indelibly marked on the outside. Information on what action to take in the event of an emergency shall be provided with each consignment.

During handling and storage of waste, it is important that incompatible wastes are separated.

The following general rules shall be applied:

- Flammable substances shall be kept separate from sources of ignition or oxidizing agents.
- Strong corrosive agents shall be kept away from gas cylinders or other containers.
- Wastes from different sources shall not be mixed, unless it is safe to do so.
- Appropriate containers (skips), compactors and bins should be provided at suitable locations around the installations.
- Separate skips with designated colour and mark should be provided for each recyclable and non-recyclable waste.



### 14.6.3 DISPOSAL OF E-WASTE

Employees shall follow manufacturer’s instructions supplied with the toner cartridges for the replacement, storage and disposal. E-wastes are collected and send to central stores from where they are disposed through approved waste recycling/disposal sub-contractor. Batteries shall be disposed at hazardous disposal facilities.

### 14.6.4 WASTE MANAGEMENT AT OFFICES

Waste receptacles shall be provided within the offices for collection of waste. Waste shall be removed periodically and never allow the skips to overflow. Wastes shall only be disposed at designated skips. All the waste collected from office will be disposed at the main disposal area, which will be disposed by third party waste management services.

**Paper waste:** Shall only be disposed at the waste bins provided at the work place.

**Plastic waste:** Shall only be disposed at the designated skips provided for disposing plastic waste on each floor.

**Food waste:** Shall only be disposed at the skips provided inside pantry.

Never allow to mix all types of waste.

**Printer toner/cartridges:** Shall not be mixed with other waste. It shall be stored separate and send to central store for disposal.

#### TYPE OF WASTE SKIPS

PLASTIC WASTE	PAPER WASTE	FOOD WASTE
<p>Designated skips will be provided on each floor for disposing plastic waste</p> 	<p>Paper waste shall only be disposed in the skips provided at your work station</p> 	<p>Food waste shall only be disposed in the skips provided inside pantry</p> 



#### 14.6.5 WASTE REDUCTION

Waste reduction is the preferable option to produce as little waste as possible by reducing waste at its source. It involves the generation of less waste through more efficient practices, and in some cases the waste can be eliminated. Waste reduction measures are often most effective during operational phases; however, the philosophy will also be applied to the construction phase to optimize waste minimization objectives.

Black Cat shall train all employees and subcontractor personnel on:



- Proper planning and to order what is needed for the project, not in excess, in order to reduce wastage;
- Order materials in bulk to reduce packaging waste and the frequency of possible spillage;
- Suppliers to minimally, but adequately, pack orders to reduce waste volume;
- Use of recyclable materials when packing orders to increase recycling opportunities;
- Order chemicals in returnable drums;
- Seek "buy-back" arrangements with suppliers for return of surplus materials;
- Procure non-hazardous products where possible;
- Substitute with less hazardous materials;
- Use of refillable containers for collection of waste fluids such as waste oil, hydraulic oil, used grease, etc.;
- Use of reusable bags
- Use all paper on two sides whenever possible by double sided printing, print rough drafts and informal documents on the back of scrap paper
- Maintain electronic copies rather than hard copy.
- Always switch off the lights, a/c and shutdown the system before you leave the office
- Report any water leak in pantry or in toilet
- Learn to repair rather than discard
- Use plug-in appliances instead of battery-operated ones. Single use or even rechargeable batteries can end up in the landfill.
- Use long lasting, energy efficient lightbulb

#### 14.6.6 HOUSEKEEPING

This section relates to housekeeping, which can lead to environmental impacts if improperly implemented. It describes housekeeping mitigation and control measures that are implemented during construction to meet objectives related to different Environmental Aspects, such as Waste generation and Spills.

##### Requirements:

Specific mitigation measures that shall be implemented in camps and in construction sites are as follows:

- Workforce is required to contribute to the clean and tidy state of the camp and construction sites. At the end of each work shift, site rubbish will be collected, segregated and disposed as required by the project Waste Management Plan.
- Vehicles or equipment exiting the site will not transfer debris or mud onto the public lands. Public roads will be maintained to be free from soil, gravel, or mud.



- Camp and construction materials and equipment will be stored and used in accordance with manufacturer recommendations and hazardous materials will be properly labelled, sealed and stored in designated areas in accordance with the Chemical Management System.
- In the event that hazardous material spillage occurs, workforce will implement spill response measures immediately in accordance with the Spill Prevention and Response Plan.
- SHE supervisors will conduct regular inspections to ensure that good housekeeping measures are maintained at all times.

#### 14.6.7 **FUEL OPERATION MANAGEMENT** (applicable for PMV yard)

This section relates to fueling operations, which can lead to generate environmental impacts on soils, surface water and groundwater if improperly managed. It describes mitigation and control measures that are implemented during construction to meet objectives related to different Environmental Aspects, such as Waste Generation and Spills.

The main objectives are to manage hydrocarbons responsibly and minimize releases to the environment.

##### **Requirements:**

Specific mitigation measures that will be implemented are as follows:

- Fuel, lubricant storage and equipment refueling will not be allowed within 50 meters of a water body.
- Dedicated fuel and lubricant storage areas will be constructed. They will provide a secure secondary containment for a capacity of at least 110% of the total volume of the containers within the bund area.
- When multiple vessels are placed within a common containment area 25% of the total capacity of the vessels or 110% of the total volume of the containers, whichever value is greater, will be used to determine the required secondary containment volume. All associated vessel valves and piping are to be contained within the bund area, and the bund area will be constructed with an impervious liner.
- Appropriate spill containment equipment and supplies will be stored onsite local to the refueling and storage areas and used as needed.
- Fuel tanker and bowser fueling hoses must be equipped with an automatic shut-off mechanism.
- Drip trays must be used by the fueling crew during equipment fueling to prevent soil contamination from minor fuel releases.
- Valves and taps must not be left open while unattended and must be locked when not in use.
- Personnel carrying out refueling operations are to be made aware of the environmental requirements and be trained in the use of spill kits and emergency preparedness.

#### 14.6.8 **SEWAGE TREATMENT/WASTE WATER**

Wastewater from the camp, toilets and wash basins shall be directed to a suitable disposal drain. Wastewater from the construction site toilets and wash basins will be directed to suitable sewage collection tanks / effluent holding tanks, which will be regularly emptied and transported by tanker truck.

The wastewater that has to be disposed will be analyzed first at a third-party lab for all the landscaping before disposal and then based on the analysis results water will be disposed accordingly. If the wastewater quality meets landscaping parameters, then the wastewater will be reused for dust suppression or disposal at MME approved buffer zone / green belt



area. If in case wastewater does not meet landscaping quality then wastewater will be discharged through an approved waste management service provider.

#### 14.6.9 SPILL MANAGEMENT

A spill is a condition in which a substance is released by accident through improper storage or accidents during transport. The nature of the spill is determined by the risk from the hazardous substance and the level of containment of the spill. Chemical spill can cause harm to people and the environment. Therefore, the workers handling a hazardous chemical should be aware of the procedures in the event of a spill and this information can be sourced through Safety Data Sheet (SDS).

Hazards of spill includes:

1. **Damage to environment** – If spills are not cleaned up properly, it can contaminate the air, soil or water harming the environment.
2. **Personal injury or health effects:** Humans exposed to chemicals through either direct contact or hazardous fumes can face health problems even death.
3. **Fire and explosion:** Dangerous chemicals, such as oil, are extremely flammable and can cause a fire and explosion hazard if spilled

##### 14.6.9.1 PRECAUTIONS TO PREVENT SPILL

- a) **Storage:**
  - Always store chemicals/ hazardous substances under the shade
  - Place the liquid containers in drip tray
  - Chemical containers shall be labelled. All types of hazardous chemicals must possess a clear and accurate label
  - Consider the use of floor mats near liquid containers
  - Securely seal material before storage
  - Do not store excess quantity of materials than required. Limit the amount to minimize the risk and size of spills
- b) **Training:** Workers should be trained on how to properly handle the respective chemicals, including which containers to store it in, what PPE to wear, how to minimize the risk of a spill when handling the chemical, and the proper cleanup procedure in the event of a spill. HSE department shall be responsible for conducting the training to employees.
- c) **Risk Assessment:** Prior to use, store or handle a chemical, Risk Assessment shall be carried out to identify what are the potential hazards and risks associated and to define the mitigation measures.
- d) **Spill Kits:** Spill kits should be located near to the areas where hazardous chemicals are stored or used in the workplace. Spill kits shall contain materials that rapidly absorb leaked chemicals and contain the spilled chemical, which minimizes the impact of any leak.
- e) **Spill response plan** or Emergency Preparedness Plan shall be developed and communicated to all employees those handle hazardous substances or chemicals.
- f) **Inspection:** Storage area shall be inspected frequently, and record shall be maintained.
- g) **Warning Signage's** shall be posted, and only authorized employees shall be allowed to enter the area.
- h) **Safety Data Sheet (SDS):** Always read SDS before handling any hazardous substances.



- i) **Reporting:** In case a spill is caused or find a spill, immediately notify your supervisor, HSE Officer and coworkers in the area. If the spill is major, raise the alarm and move to the nearest muster point

#### 14.6.9.2 SPILL RESPONSE

- a) Do not touch any harmful substance. Take precautions to protect yourself if necessary.
- b) Approach with care – never assume that they are harmless
- c) Secure area, by restricting access and posting signs
- d) Remove any potential ignition sources and unplug nearby electrical equipment
- e) Refer SDS for identifying the chemical and hazard
- f) If it is a major spill, raise the alarm and seek help from Emergency Response Team (ERT)
- g) Report all spill incidents to site HSE Officer and Supervisor
- h) If there any personal injured, move the victim from spill area and provide first aid if you are a trained First Aider. Locate the nearest eye wash or safety shower and pour water on effected area
- i) Use appropriate Personal Protective Equipment (PPE) which includes chemical splash goggles, gloves, apron, face shield and protective clothing
- j) Confine and contain spill. Cover spill with appropriate absorbent material. Place absorbent material over the spill, making sure not to spread the liquid.
- k) Replenish spill kit

#### 14.6.9.10 AIR QUALITY MANAGEMENT

This section relates to activities that have potential to affect local air quality, and it describes measures that are implemented to achieve air quality criteria and to meet objectives related to the Environmental Aspect Air emissions.

Potential air pollutants associated with construction work and camp activities include carbon monoxide Sulphur dioxide, nitrogen oxides, VOC, and particulates. Site vehicles and heavy equipment will be the primary source of air and fugitive VOC emissions during construction activities.

The associated risks include:

- Vehicle engine exhaust,
- Equipment engine exhaust,
- Dust emissions,
- H2S Emissions from adjacent operating plant/s.

#### Requirements:

All the following mitigation and control measures are based on the above-mentioned risks and are implemented on site:

- Undertake visual emission observations.
- Maintain properly the equipment and use the best available technology with emissions warranted by the manufacture.
- Use when feasible, low Sulphur diesel for generators, heaters and construction equipment.
- Evaluate air emissions from solid waste thermal oxidizer (if used) and report results.



- Implement control measures and dust suppression techniques to minimize dust emissions during dry weather conditions.
- Use protection measures such as screening or covering work areas with netting to control air borne particulate emissions.
- Amend the soil moisture content to reduce dust emissions during earthworks and excavations.
- Inform supervision and workforce during induction training about the need to minimize dust emissions.
- Direct equipment exhausts vertically upwards where possible and fix stationery equipment as far from sensitive receptors and inhabited buildings as is feasible.
- Not operate plant and equipment engines for long periods wherever possible if the equipment is not in use. When feasible, electrically powered equipment will be used instead of petrol or diesel, including welding machines, pressure washers, air compressors, etc.
- Strictly enforce a maximum speed of 20 km per hour over all unimproved surfaces within the construction zones. Reductions to this speed limit may be applied at the discretion of Black cat when dust problems are met.
- Routinely water unpaved roads during dry periods and according to weather conditions.
- Strictly forbid onsite burning or incineration of waste materials within the construction zones. A camp incinerator WILL NOT be installed, licensed or permitted for the disposal of food wastes, paper, scrap lumber, plastics, or other wastes.
- Properly store all hazardous materials including chemicals, paints, cleaning agents, solvents and solvent containing products in sealed containers within designated hazardous waste storage areas.

## 15.0 COMMUNICATION

Internal and external communications related to Black Cat's environmental aspects are carried out as described in HSE Procedure BCEC/HSE/CP/-024-Environmental Aspects and Impacts

To achieve success in environment management, there needs to be effective communication up, down and across the organization.

Organizations need to communicate information to their workers on the environmental risks identified in the risk assessments, and the preventive and protective measures necessary to control risk. Black cat Top Management identified following methods of communication in addition to training.

### Requirements:

- Tool Box Talks  
Daily or regular tool box talks will be used to train relevant employees to efficiently use materials onsite and to minimize all potential environmental impacts, including noise, air, and water pollution; waste generation, minimization, and disposal; management of contaminated land and groundwater, and other environmental controls specific to the work activity.

### 15.1 Internal Communication

Internal communications shall be reciprocal and shall be aimed both at:

- ensuring all levels and functions are aware of the environmental policy, the objectives, and the environmental management system.



- Ensuring that suggestions, observations or complaints related to Black Cat's environmental performance and arising internally reach the management and are taken into consideration for action or decision making.

Communications from employees to management cover the following subjects:

- identification of environmental impacts by any individual or working team;
- identification of training needs by any individual or working team;
- detection of any non-compliances;
- information about new available technologies for prevention of pollution.

Communications from management to employees include:

- information about Compliance Obligations;
- report of environmental authority's inspections;
- environmental fines and rewards;
- environmental policy and objectives;
- detection of non-compliances;
- information about new available technologies for prevention of pollution.

The HSEQ Manager and/or his designee/HSEQ Department is responsible for these communications.

All communications and the corresponding response under the signature of relevant person shall be properly documented.

Environmental topics shall be addressed to all employees during HSE meetings including:

- Site SHES steering committee meetings
- Weekly SHES meetings
- Progress meetings
- Toolbox meetings
- TSTI meetings
- Trainings
- Poster Campaigns
- Intranet
- Monthly Environmental meetings with Subcontractors
- Monthly Environmental meetings with Client Environmental Focal point to provide status/update of Project Environmental issues/concerns and progress on Environmental Action plan
- They shall be taken into account when performing Risk Assessment and Method Statement, Job Safety Analysis, Inspections, Hazard Observation Program and Incentives

## 15.2 External Communication

Communication with external interested parties (government agencies, local communities, and media) will be coordinated via management.

External communications are aimed at:

- Disclose Black Cat's environmental policy and reports;
- Inform local authorities and community about any incident or accident which results in serious damage of the environment, in order to take the appropriate measures;



- respond to communications regarding environmental matters coming from any external interested party.

They include communications with:

- customers
- regulatory bodies
- government agencies/departments/ministries
- local community
- environmental group

## 16.0 EMERGENCY PREPAREDNESS AND RESPONSE

Black Cat has identified incidents arising from abnormal operating conditions, potential incidents and emergency situations, and has established an Emergency Plan to ensure appropriate response in these situations.

Emergency Plan includes instructions that describe the actions to undertake in order to mitigate the environmental impacts associated to each one of the identified situations namely:

- Accidental emissions to atmosphere
- Accidental discharges to water and land
- Effects on ecosystem (including flora, fauna, human) from accidental releases

The Emergency Plan shall be reviewed after the occurrence of an environmental incident or emergency situation and revised if necessary.

All site work activities shall only be started after getting a valid work permit at site. Appropriate training shall be provided by Black Cat all employees including workers and subcontractors – which includes Emergency procedure during the site safety induction and Tool Box Talks. Black Cat HSE Department will provide the training for Emergency Response Team, firewatcher, fire warden and first aider.

## 17.0 TRAINING

### 17.1 ENVIRONMENTAL TRAINING, INDUCTION, EDUCATION & AWARENESS

Black Cat shall provide training, inductions and awareness for all its relevant employees and contractors/subcontractors in order to ensure they are aware of the environmental management system as defines in ISO 14001, the environmental policy (in QHSE policy) , objectives and targets of the company, its impacts on the environment and the benefits of improved personal performance.

Also, to ensure that Black Cat personnel understand their responsibilities and expectations in relation to environmental management, a training and awareness will be conducted specific to either project or task requirements.

The training requirements have been broken down into the following categories:

- Induction Training (inclusive of environmental specific items)
- Task Specific Training
- Environmental Awareness Training



Black Cat has identified in its Training Needs Analysis Matrix and Training and Induction Plan the environmental training and competency requirements for all Company activities and will implement appropriate competency-based training for each person, based on the actual or potential environmental risks associated with their role. The Training Process is documented in the Company training plan and Company competency framework Matrix. Where required, all Company and sub-contractor personnel shall attend compulsory Company inductions and code of conduct awareness training for all personnel working at Head Office and the Project Area of Operations. Company shall maintain documented records as verification that personnel have received the appropriate training and are competent to fulfil their roles.

Specialized training will be given to all personnel assigned to work on the site depending on their tasks. Such training courses will be delivered before commencing work and on a periodic basis thereafter to ensure a high level of environmental awareness.

All training materials will be prepared by a designated competent person. The training will be delivered by the delegated competent person.

#### Requirements:

Specialized training courses will include the following:

- Waste management
- Water management and dewatering procedures
- Noise, dust, and vibration control
- Spill response procedures
- Chemical handling and storage
- Fuel storage and refueling procedures
- Environmental basic awareness
- Hazardous Material Handling

#### Refresher Courses

Employees who seriously or repeatedly violate environmental rules and requirements or who are designated by the HSE Department will take training refresher courses to enhance their awareness and reinforce their knowledge.

## 18.0 REFERENCE DOCUMENTS

Document Number	Document /Procedure Title
BCEC/QHSE-001	QHSE Policy Statement
BCEC-QHSE-M-001	QHSE Manual
ISO 14001:2015	Environmental Management System
BCEC/IMS/005	Objectives and Risk & Opportunities
BCEC/HSE/CP/029	HSE Risk and Hazard Management
BCEC/HSE/CP/029	Incident Reporting and Investigation
BCEC/IMS/008	Performance Monitoring, & Measure
BCEC/IMS/004	Training



Document Number	Document /Procedure Title
BCEC/IMS/002	Internal Audit
BCEC/IMS/007	Compliance Obligations, Legal Requirements & Other Requirements
BCEC/HSE/CP-024	Environmental Aspects and Impacts
Specific to Project	Contractor Management Guidelines
Specific to Project	Project Operations Execution Plans
Specific to Project	Project HSEM Plans
Specific to Project	Emergency Response Plan

## 19.0 INSPECTION AND AUDITS

BCEC shall monitoring and measurement (audit, inspections and reviews) of the key characteristics of project activities that can have a significant impact on the environment. The environmental aspects and impacts as identified by the Project's risk assessment tools are outlined in the Project Hazard Register. The specific environmental monitoring activities required to assess the effectiveness of controls for these aspects and impacts will be undertaken in accordance with BCEC HSE Activity Schedule. In addition to the identified significant environmental aspects referenced in Appendix A, the following environmental parameters will be monitored, but may not be limited to:

- Volumes of chemical received and used and disposed
- Volumes of non-hazardous wastes transferred for disposal or recycling.
- Volumes of hazardous wastes transferred for disposal or recycling.
- Quantity of diesel fuel used.
- Summary of any environmental incidents.
- Consumption levels of products such as paper, water
- Daily office energy usage
- Volumes of medical waste

## 19.1 MONITORING AND MEASURING MATRIX

Elements	Measures	Monitoring
Fuel	Fuel usage on site and office vehicles	Monitoring fuel from month to month
Electricity	Consumption in HO + Work Shop	Monitoring Monthly
Water	Consumption in HO + Work Shop	Monthly
Paper	Consumption in HO + Work Shop	As collected
Waste collection and disposal	Site and Head Office	As requested via projects with segregation i.e. Steel, Hazardous, general



Elements	Measures	Monitoring
Environmental Incidents	All	As per incident reporting process
Training Completed		TBA
Audits and Inspection	Site Head Office	Action close out
Environmental Protection Law no. 30	All processes in place	Internal audit outcomes
Public Hygiene and Cleaning Law no. (18) of the year 2017	Medical waste	Monthly totals

## 19.2 INSPECTION

Black Cat HSE Officer/Engineer shall conduct periodic inspections to all waste and chemical storage, segregation areas. Inspection report along with the recommendations shall be forwarded to site in charge for corrective action.

## 19.3 EVALUATION OF COMPLIANCE

The Company shall check and evaluate the fulfilment of its environmental compliance obligations periodically not exceeding one year (during one of the management review meetings). Results of the evaluation process shall be documented and records shall be maintained as evidence of the compliance evaluation result.

The frequency and timing of compliance evaluations may also vary, this period can be increased depending on the importance of the requirements, variations in operating conditions, changes in compliance obligations and the organization's past performance.

## 19.4 AUDITS

In accordance with the IMS Internal Audit, the Company shall establish and implement an HSE audit program to ensure that Black Cat employees and subcontractors are complying with applicable laws, legislation, regulations and guidelines of MME. This HSE audit program will include monthly site audits, quarterly internal audits (site HSE personnel), external audits and client audits.

As part of performance monitoring of environmental Management System (EMS), a quarterly department's self-audit/assessment shall be conducted by HSEQ Department to review its own internal process and to ensure implementation of Environmental Management Systems and compliance with the ISO 14001. Also, to verify efficiency/effectiveness and relevant of internal process being implemented.



# PROCEDURE

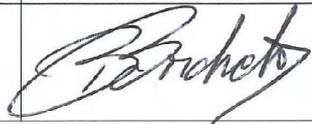
## HEALTH, SAFETY & ENVIRONMENT (HSE)

## HEALTH & WELLNESS AND FITNESS TO WORK (FTW)



### REVISION HISTORY

Revision No.	Issue Date	Amendment Description	Date Effective DD/MM/YY
0	09.12.2019	First issue and for implementation of procedure on Health & Wellness and Fitness to Work (FTW)	09.12.2019

Action	Responsible	Signature	Date
Initiated & Prepared by:	M.E. Edavazhikal		09.12.2019
Prepared by:	D. Guinto		09/12/2019
Checked & Reviewed by:	C.P. Gibson		09/12/2019
Approved by:	P. Borchetta		09/12/2019

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### ATTACHMENTS

Attachment No. 1 – PRE-EMPLOYMENT MEDICAL EVALUATION REPORT

Attachment No. 2 – HEALTH SURVEILLANCE QUESTIONNAIRE

Attachment No. 3A – SICKNESS / INJURY SELF-CERTIFICATION FORM

Attachment No. 3B – SICKNESS / INJURY RETURN TO WORK INTERVIEW

Attachment No. 4 – BLACK CAT HEALTH SELF-DECLARATION QUESTIONNAIRE

Attachment No. 5 – OCCUPATIONAL HEALTH QUESTIONNAIRE



**1.0 INTERNAL CONTROLS**

**1.1 VALIDATION**

To assure Managements and External Agencies confidence in the Company's policies and practices; Black Cat Engineering & Construction W.L.L. (BCEC) Internal Audit may verify without notice, compliance with this Procedure.

The **Health, Safety & Environment and Quality (HSEQ) Department** shall re-validate this procedure at intervals not exceeding three years to ensure that it continues to serve the purpose intended and is updated to reflect changes within the Company.

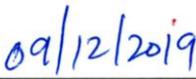
**1.2 APPROVAL**

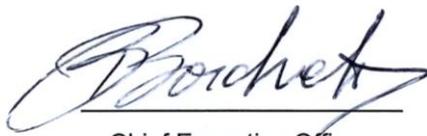
This procedure and any amendments made thereto; require the following approvals:

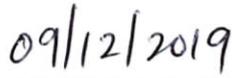
**Authority**

**Date**

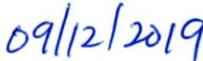
  
\_\_\_\_\_  
HSEQ Manager

  
\_\_\_\_\_

  
\_\_\_\_\_  
Chief Executive Officer

  
\_\_\_\_\_

This document has been reviewed by Documents and Standards. It complies with the requirements and it is considered ready for issue.

Signed  Date 

## 2.0 PURPOSE

The purpose of this documented plan is to ensure that Black Cat Engineering and Construction W.L.L (BCEC) have in place a health wellness and fitness for work process that encompasses both direct employees and contractor personnel. The plan follows local Qatar laws and regulations.

## 3.0 SCOPE

This Plan outlines the process for managing the health and wellness of Black Cat Engineering and Construction W.L.L (BCEC) employees. The plan also includes how Black Cat will manage fitness to work (FTW) for direct employees and contractors working on Black Cat projects.

## 4.0 OBJECTIVES

The Black Cat shall organize and maintain a health wellness and fitness for work plan to achieve the following objectives:

- Assess the worker's physical, emotional and psychological assets as well as his liabilities in order to facilitate his proper placement and ensure the suitability of individuals according to their physical capacities, mental abilities and emotional make-up in work which they can perform with an acceptable degree of efficiency without endangering their own health and safety and that of their co-workers;
- Protect employees against health hazards in their working environment in order to prevent occupational as well as non-occupational diseases;
- Provision for first-aid, emergency services and treatment depending on the nature of the work;
- Assure adequate medical care of ill and injured workers;
- Encourage personal health maintenance and physical fitness and proper nutrition practices;
- Provide health education guidance and counseling as well as health awareness program.
- Proactively manage the employees who may expected to work related fatigue issues.
- Effectively manage in successful return to work process when sickness, illness and injuries reported.

## 5.0 RESPONSIBILITIES

### **CHIEF EXECUTIVE OFFICER (CEO)**

It is the responsibility of the CEO to:

- Ensure this procedure is implemented, adhered to and reviewed periodically in line with the Company HSEQ management system requirements

### **DEPARTMENT MANAGERS**

It is the responsibility of the Department Manager to:

- Follow current HSEQ procedures
- Implement and communicate all process updates and changes
- Ensure that the health wellness and fitness for work process is implemented, and key actions taken where required



### **HSEQ MANAGER (Corporate)**

It is the responsibility of the HSEQ Manager to:

- Ensure this procedure is reviewed periodically in line with the Company HSEQ management system requirements
- Implement and communicate all process updates and changes
- Ensure that the health wellness and fitness for work process is implemented, and key actions taken where required

### **HSE FIELD MANAGER / PROJECT HSE LEAD**

It is the responsibility of the HSE Field Manager to:

- Ensure this procedure is reviewed periodically in line with the Company HSEQ management system requirements
- Assist and Advisor the PMT and Supervisors in all health-related matters pertaining to this procedure
- Communicate with the Project HSE Lead to ensure that all potential project health risk is identified and mitigated.

### **PROJECT MANAGER**

It is the responsibility of the PM to:

- Follow current HSEQ procedures
- Implement and communicate all process updates and changes
- Ensure that the risk management process is implemented, and key actions taken where required

### **SUPERVISORS (Line Managers)**

It is the responsibility of the LM / supervisors which will include but not limited to;

- Supervisors shall report any reported health issues to their direct Manager.
- Discuss all hazards and preventive measures during JHA/HIRA reviewed with work groups including health wellness and fitness for work
- Conducting regular HSE inspections according to agreed schedule, to ensure that all tools, equipment, machines and premises are in safe and good operating condition and there has been no change to task with new or potential hazards/health concerns.

### **HUMAN RESOURCES DEPARTMENT HEAD**

- Ensure company FTW process is effectively functioning
- Support OHN and HSE team with for Health and Wellbeing program
- Coordinate with OHN with related to return to work process after a sickness

### **ADMINISTRATION DEPARTMENT HEAD**

- Support for arranging external medical for identified risk group
- Ensure clinic license and OHN license were renewed periodically
- Ensure that the Return to Work form is completed by employee and necessary discussions are completed with the OHN / Supervisor / Engineer and keep a copy of record with the employee personal file



## **COMPANY NURSE**

- Attend day to day treatment of personnel reporting to clinic from projects and the distribution of medical consumables to personnel after asking the patient are not allergic in have adverse effects to certain medicines or treatments.
- Assessment of initial & ongoing treatment and evaluation of occupational injury and illness cases, including injury reporting.
- Permitted to treat first aid, minor cases and any symptoms or diagnosis which are outside their spectrum of knowledge or more importantly, regulatory level, must be referred to an appropriately licensed facility.
- Coordinate / follow up on any medical cases referred to the HMC or other licensed health care provider to ensure that all sick and injured patients receive adequate medical treatment and after care treatment and update to the employee line supervisor or project manager and HSEQ Manager.
- Ensure employee health records are confidential and manage annual medical appraisal and as per plan.
- Safeguard medical record or medical history of employees and do not hand over the employee personal record to anyone without employee knowledge.
- Promote and support health, wellbeing and fitness for work initiatives.
- Follow ups to external health care provider on pending test results (spirometry, audiometry, periodic medical surveillance)
- Report trends and analysis of health, safety and wellbeing initiatives in accordance with plan.
- Ensure reports include information on non-work-related illness or injuries, or information that identifies individual workers.
- Assisting patients on hospital appointments & follow-ups

## **WORKERS**

Responsibilities include:

- Responsible for completing the assigned tasks safely in accordance with company and client safety procedure/guidelines.
- Employees shall attend all the mandatory training courses.
- Use and maintain Personal Protective Equipment in the appropriate manner
- Attend and actively participate in HSE meetings conducted for the workers.
- Report to supervisors / HSE Department through verbal or written reports (Hazard Report Card) concerning revealed unsafe act / unsafe conditions or any Near Misses immediately.
- Always work according to BCEC lifesaving rules
- Participate in daily TBT and understand JHA for their given task
- Report all unsafe acts and unsafe conditions
- Stop work if conditions change report to Supervisor (MOC)
- Report immediately if feeling unwell
- Complete pre-employment medicals and annual medicals when required
- Ensure they are fit for work with no impairment or other factors that compromise their own safety, or the safety of others.
- Notify their manager or the Injury Management and Health Program Coordinator if they are concerned that they may not be fit for work.
- Participate in health, wellbeing and fit for work activities where required or agreed.
- Comply with health monitoring and fit for work requirements.



## 6.0 DEFINITIONS

Term	Definition
Fit to work (FTW)	A person is in a state (physical, mental and emotional) that enables them to perform assigned tasks safely, competently and in a manner that does not threaten or compromise the safety or health of themselves or others.
Fit for Work Program	A program that establishes and implements initiatives to address potential risk factors that may cause the impairment of a worker. This includes initiatives such as alcohol and drug monitoring, along with stress and fatigue management strategies.
Health & Wellbeing Program	A schedule of health assessment and health promotion activities provided to BCEC employees.
Health monitoring	Health monitoring systematically detects and assesses any adverse effects of work on the health status of workers as it relates to their duties. It is delivered through real time monitoring of exposure levels, medical assessment and biological monitoring of workers (e.g. blood/urine tests for checking chemical exposure).
Health needs assessment	An assessment undertaken to determine the health risks associated with the both the workplace environment and individual employee health characteristics.
Injury management	A comprehensive and coordinated approach to the management of injuries and workers claims in the workplace. It is generally defined as a workplace managed process incorporating employer and medical management, from the time of injury through to a return to suitable employment.
Health Surveillance	The continuous monitoring of the health of an individual deemed at risk by the nature of their employment. The objective of health surveillance is to detect adverse health effects at an early stage, before any long term or irreversible health damage occurs.

## 6.0 HEALTH AND WELLNESS

Black Cat's Health and Wellbeing Program is aimed at developing initiatives to improve or maintain the overall physical and psychological health and wellbeing of employees. This will help the company and ensure employees are fit for work, while supporting Black Cat's employee availability strategies and wellness programs can lower health.

All initiatives delivered within the Health and Wellbeing Program will be determined based on a risk assessment process, which includes the following:

- Identification of the health and wellbeing risk factors impacting BCEC employees. This may be determined by undertaking a Health Needs Assessment.
- Identification of any environmental risk factors that may impact on the health and wellbeing of BCEC employees.
- Assessments of the level of risk, including how many BCEC employees are at risk.
- Identification of resources like, available time, cost effective way, staff / expertise and implementation of evidence-based initiatives that are available to address the risk.
- Consideration of how the effectiveness of the initiatives will be monitored and evaluated.

The Health and Wellbeing initiatives should be consulted by HSEQ manager and that is coordinated by BCEC OHP – nurse and project HSE team in field. Respective project management team must support and implement initiatives. Wellness programs can lower health care cost and encourage workers to adopt healthier lifestyles. Following sporting programs will be organize as part of worker lifestyle wellness:

- Sports day friendly competitions
- Smoking Cessation program
- Exercise incentive program
- Proper and balance diet program
- Health awareness program
- Stress Management

#### 6.1 **Black Cat First Aid Facility (Clinic)**

The BCEC Clinic is located at BCEC workshop based in QP-RLIC support service area and staffed by one qualified and licensed nurse, in accordance with the Qatar Ministry of Public Health regulations. The nurse work at clinic in day shift to provide the maximum amount of support to all personnel accommodated in Black Cat sites, which also includes a 24/7 on call service when the Clinic is closed during twilight hours.

Typical symptoms treated in the Clinic, but by no means exhaustive are, common coughs and colds, flu, muscular pain, urinary and bowel problems, lacerations, burns, abrasions, through to the assistance of colleagues with long term medication requirements for the treatment of diabetes, asthma and eczema. These symptoms are treated with a comprehensive stock of non-prescription medicines and first aid materials, which is consistently monitored and re-stocked. The company recognizes the need to provide emergency medicines that are considered commonly taken and can be dispensed without need for a doctor's prescription, in order to provide relief to its employees who are suffering from minor physical discomfort or pain brought about by minor sickness. The Company provides medical consumables for clinic and employees' use. All BCEC employees can directly approach to BCEC Clinic after reporting their illness / sickness to the concerned supervisor

The nurse is suitably qualified to identify more serious symptoms, which whilst they cannot treat, they possess the knowledge to recognize these symptoms and the Patient is referred to Hamad Medical Services for further diagnosis and immediate treatment.

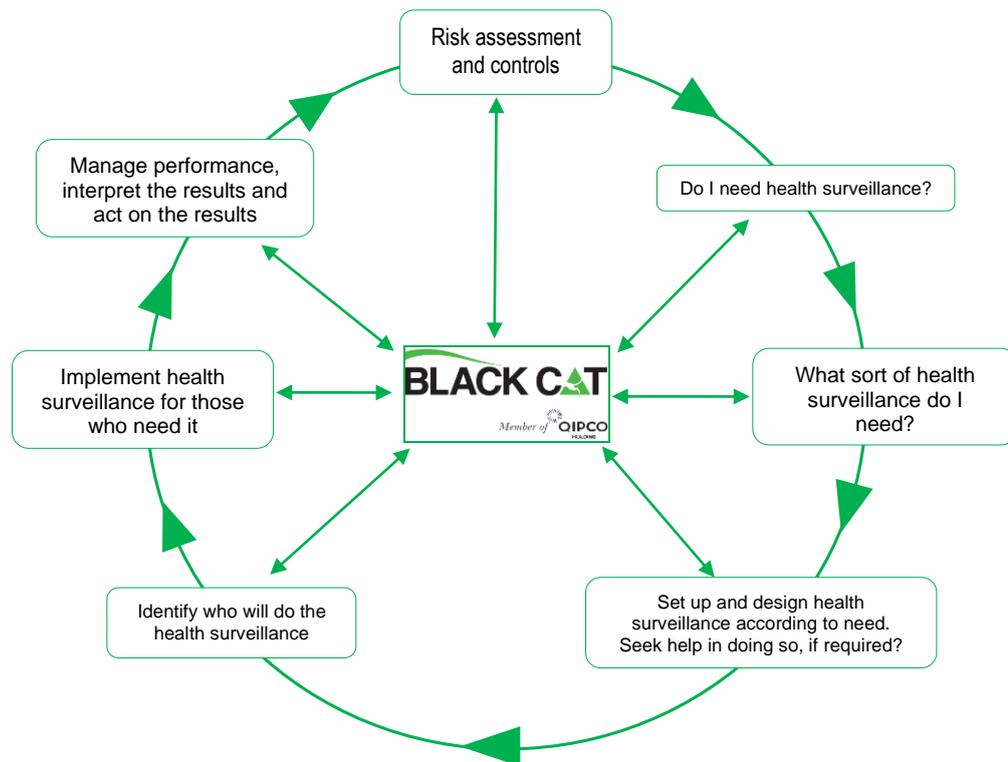
*Clinic Hours of Operation:* The core Clinic hours of operation are between 06:00 hrs and 17:00 hrs, however a Nurse is always on call and can be contacted 24 hours a day, 7 days a week. In the case of medical assistance being required out of the regular Clinic hours of operation, personnel should approach the on-duty Camp Administrator, who will in turn raise the on-call Nurse to attend the Clinic. Employees can also approach the RLIC camp clinic without any hindrance.

#### 6.2 **Health Surveillance**

Health surveillance is a system of ongoing health checks. These health checks required for employees who are exposed to noise or vibration, ionizing radiation, solvents, fumes, dusts, biological agents and other substances hazardous to health, or work in compressed air. Employees who are working similar location prolonged duration with or without required control measures subjected for health surveillance based on local legislation and client requirements. A health surveillance questionnaire (Attachment - 1) will be used to gather the details on targeted employees and the outcome is used to determine for further course of action.



The diagram below provides an overview of the health surveillance cycle.



**Examples of such conditions would include (the list is not exhaustive):**

- Hand Arm Vibration Syndrome (HAVS) from working with vibratory tools. The more commonly known form of damage is Vibration White Finger (VWF);
- Noise induced hearing loss from working in noisy environments;
- Sun burn/skin cancer from working in direct sunlight;
- Silicosis from working with silica-based products;
- Occupational Asthma from working with respiratory sensitizers (i.e. adhesives, bitumen, solvents);
- Dermatitis from working with skin sensitizers (i.e. cement, bitumen, acids, alkalis);
- Cancer from working with carcinogenic materials (i.e. mineral oils, wood dusts).

**Health surveillance will be provided when:**

- Required by health and safety legislation or sector best practice.
- The work is known to have the potential to damage health, i.e. working with respiratory sensitizers, skin sensitizers or exposed to noise, or if there is evidence of sensitization in an individual.
- There is a valid, safe and practical technique to detect onset of ill health, which should be sensitive, non-invasive and acceptable.

The requirement to undertake health surveillance will be determined following risk assessment. Health surveillance will consist of a medical questionnaire and will be conducted as per guidance from HSEQ Manager. If any employees are identified in surveillance questionnaire then OHN to be reviewed and informed to HSE / HR department managers for further course of action.

Those employees identified / relevant for health surveillance testing, a test will be offered through BCEC Administration and the Results from the health surveillance checks will be forwarded to the employee, Line Manager and a copy of the results will be retained by Human Resources.

### 6.3 Fatigue Management

Fatigue can impair fitness to work and may have negative impacts in the areas of Health, Safety, Security and the Environment. Black Cat (BCEC) is committed to providing a safe work system and a safe productive workplace by eliminating similar conditions and work practiced that could lead to personal injury, equipment and other property damage.

BCEC's objective is that all employees recognize this threat and manage and minimize the associated risks.

In support of our commitment BCEC will:

Create a safe working environment by managing the risks associated with fatigue as described below: Set standards to provide adequate opportunity for sleep prior to commencement of work duties.

- Identify and manage work related fatigue issues.
- Actively manage employees who are deemed temporarily unfit for work as a result of fatigue.
- Underpinning this BCEC expects that each person is accountable for:
  - Raising concerns about their own level of fatigue with their line supervisor or engineer.
  - Complying with BCEC / Client's fatigue management plan
  - Complying with the appropriate fatigue related Laws of Qatar (section 1.6).
  - Ensuring they have obtained the required sleep between shifts in order to minimize the risks associated with fatigue.
  - Raising concerns about another person's level of fatigue with that person and their line supervisor / engineer.
  - Notifying their line supervisor / engineer of any situation where elements of this fatigue management may apply or there has been a breach of the requirements of fatigue management.

FMP applies to all Black Cat employees and includes contractors, visitors, apprentices and trainees whilst they are working at or visiting Black Cat sites or property. Also, Fatigue Management covers work arrangements for the staff / workers that involve any of the following:

- A planned shift length excluding overtime and handovers greater than 12 hours within a 24-hour period; or
- Overtime resulting in working day being greater than 14 hours or more
- Overtime or Call-outs resulting in 16 hours in one calendar day; or



- Shift work or Call-outs at any time between 22:00 and 06:00, including shifts that start during or extend into this period; or
- Shift changes from Day – Night – Day
- Professional drivers overtime and weekend work
- People returning from annual leave
- Additional time resulting from daily long commutes

The objective of this section is to create a safe working environment and prevent the risks associated with fatigue by formalizing and limiting extended hour/ overtime works (work beyond normal working hours).

Maximum planned hours of service, including 60 minutes of lunch break, under normal operations. This standard working hours as described as below table:

*Table:1 standard working hour*

Shift	Pattern	Start/End	Working hours per 24 hrs
5/2	5 days on/ 2 days off	07:00 – 17:35 (Sun – Thu)	9.6
6/1	6 days on/ 1 days off	07:00 – 17:00 (Sat – Thu)	9 (including 1hr OT)
Offshore	TBD	TBD	

Deviations and exceptions, from above can be given for:

- o Emergency situation
- o Unless the work is necessary for the prevention of gross loss or dangerous accident or for the repair or alleviation of the consequences of the said loss or accident
- o S/B or a critical activity necessary to be continued beyond the standard working hours.

If any of the above circumstances require the workers to continue working on two consecutive Fridays, then the next day must be a 'rest day' – Qatar Labor Law Article- 75.

### ***Roster design and assessment***

The mandatory rest period for each position covered under fatigue management is consecutive 8 hours of rest. The key to managing fatigue successfully is ensuring that workers have sufficient time between shifts. Adults require approximately seven to eight continuous hours of daily sleep. When rosters are designing for special task (egs: drivers), fatigue management must be considered.

Type of work being performed - the greater the physical and/or mental effort required, the longer the total break time required per shift; and Length of shifts worked' the longer the shift the longer the total break time required per shift.

Employees experiencing fatigue that has been attributed to workload or commitments should consult with their supervisor or manager to review workloads / task allocation. The possibility of task rotation could be considered where practicable.

Workers who consider that roster arrangements are contributing to a fatigue problem should consult with their supervisor or engineer. The duty rosters should be assessed for the potential to cause fatigue and includes hours of work described as in work scope.

If individuals recognize their own fatigued condition, they must be informed to supervisor about their concern over their ability to work safely.



Change may also include periodic cultural events such as Ramadan, when changes to eating, drinking and social patterns is like to result in fatigue risk. Mitigation plans appropriate to the situation must be put place

Incident investigation shall be conducted in a manner that facilitates the determination of the role, if any, of fatigue as a root cause or contributing to the incident.

Assessment can also be done using bio-mathematical modelling as per advice of a SME. The assessment methodology required will be determined by the Project Management.

#### 6.4 Heat Stress Management

Working at high heat stress levels, mental confusion can develop and cause workers to perform unsafe acts. Working in dry or moist heat poses several hazards. If personnel are in a protected environment the risk is minimal. However, when personnel step out into the extreme heat or humidity, there exist several potential hazards.

*Ministry of Labour and Social Affairs – Ministerial Decree no. 16 of 2007* the working hours in open places under the sun are restricted during the summer period. Summer working hours fixed by the Ministry of Labour from the 15<sup>th</sup> of June to the 31<sup>st</sup> of August where working hours shouldn't be longer than five hours in the morning and it must not exceed 11:30 am as well. As for the evening time, working hours must not start before 3:00 pm.

Under the mid-day work ban, BCEC implements the rescheduling of working hours, giving a noon break for outdoor laborers in which the following working hours should be followed by BCEC Site Teams:

- All site staff and workers (direct & indirect) will work as straight shift from 05:30 a.m. to 11:30 a.m. at morning session.
- Summer rest break will be in between 11:30 a.m. to 15:00 p.m.
- All site staff and workers (direct & indirect) will work as straight shift from 15:00 p.m. to 18:00 p.m. at afternoon session.

It is BCEC responsibility to implement a safe system of work, which addresses heat stress for all workers. The hierarchy for providing a safe working environment in high heat is the same as exposure to any other dangerous substance. Following measures mentioned in Table -2, to be considered as a readiness to beat the heat program before summer period starts.

Table -2 / Hierarchy of Controls on heat stress

Engineering Controls	Administrative arrangements
<ul style="list-style-type: none"> <li>○ General Ventilation</li> <li>○ Local Ventilation</li> <li>○ Air treatment / Air cooling</li> <li>○ Radiant heat reduction</li> <li>○ Shade requirements</li> </ul>	<ul style="list-style-type: none"> <li>○ Training / Awareness</li> <li>○ Work scheduling</li> <li>○ Fluid replacement</li> <li>○ Acclimatization</li> <li>○ Work/ rest cycles</li> <li>○ Recovery times</li> <li>○ Self determination</li> <li>○ Check times</li> <li>○ Other administrative controls</li> </ul>

Rest locations should be ventilated and shaded. BCEC workers will have an adequate supply of cool water available in rest location and encourage our workers to drink plenty of fluids to replace those lost during work activities. Heat index (HI) is classified using a color-coding system and these statuses are notified through hoisting flags. Heat Index (temperature measurement) will be taken in the area of work activities and heat index status details shall be recorded and communicated to the work team by the assigned person.

Project manager and HSE Lead in respective projects shall be responsible for implementing BCEC guideline BCEC/HSE/GL/004 and manage heat stress in an effective way.

## 6.5 Illness and Injury Reporting

The sickness, illness and injury notification and reporting set out the steps that must be followed when someone is unable to perform his/her duties due to sickness, illness or injury. Line supervisors should ensure that staff fully understands and follows procedures, BCEC/HRD/001- Article -2 and BCEC/HSE/CP/010

If an employee is too unwell to perform his/her duties, he or she must contact his/her line supervisor, preferably before the start of his/her normal working day but certainly within two hours of the normal start time. The employee must tell his/her Manager or designated person:

- The nature of the sickness/symptoms;
- The likely date when he or she expects to return to work (if known);
- Whether he or she plans to see his/her doctor or seek other medical advice, any appointments.

In case the employee is sick during working hours, inform the Direct Supervisor and Engineer and take medical attention at BCEC Clinic.

Employees residing in camp having sick or injured then that need to be informed to the direct supervisor and camp administrator and take medical attention from camp clinic or BCEC clinic.

Employees residing in their own accommodation having sick or injury shall be reported to their direct supervisor and seek medical attention and shall be produce the medical certificate showing fit to work.

Injuries and illness are subjected for incident investigation hence reporting to their project HSE department is appropriate as per incident and reporting procedure BCEC

## 6.6 Return to work

Staff members returning from absence of sickness / injury in any duration must complete a return to work discussion with OHN and his/her line supervisor / engineer. This is a face to face formal discussion or meeting and the purpose is to welcome the employee back to work; ensure that he / she is fit to return and offer support as required. It will include discussion of the reasons, duration and any underlying cause of the absence as appropriate and the completion of the return to work medical questionnaire.

Appendix- 2 (A) shall be used to record the discussion and a copy of the same to be share to the OHN and Administration department. If the employee returning after seven days, then Appendix - 2 (B) also to be completed along with medical certificate. In case employee is reporting to BCEC after a major sickness or injury during vacation these forms must be



filled and submitted along with medical record to HR / ADMIN and subjected to OHN verification for further follow up or monitoring. Any injuries, incident or restricted case / duty must be notified to the HSE department.

## 6.7 Medical Condition Monitoring

Any new or current employee of BCEC and contracted staff that has been identified to have significant medical condition or high risk (e.g. high blood sugar, high blood pressure) on their pre-employment screening, periodic medical screening and also those who have pre-existing medical conditions will be subjected to report to BCEC clinic for assessment and monitoring in order to ensure their wellness in doing their respective jobs.

If the employee's medical condition after monitoring shows significant medical reason for further treatment, he or she will be referred by the OHN to an external medical provider for further re-assessment and treatment. After treatment, the employee will have to report back to the OHN with medical reports for review and based on the post treatment assessment the adequate monitoring for the medical condition will be implemented.

## 7.0 FITNESS FOR WORK

This section sets the minimum requirements for Fitness to Work certification of workers employed by BCEC and its contracted Staff. This is a requirement to ensure workers are not impaired from health issues for effective performance of their duties. The Fit for Work program has been established by BCEC to ensure there is a systematic process for identifying potential risk factors that may cause the impairment of a worker, then establishing strategies to address these risks.

### 7.1 Pre-employment screening

It is a regulatory requirement for all employees to undergo a basic health screening process as part processing the visa. Fitness to Work examination to be done only from approved clinics. State of Qatar has started visa service centers in most of Asian countries and employees to seek medical those centers for visa medical however employees must be bringing a GAMCA medical certificate during the process of employment. Countries do not have GAMCA medical centers, then employee to follow company medical screening form attached as (Attachment – 3) for medical evaluation from their origin country along with completed self-declaration and to submit HR as pre-employment medical report. Certain projects under BCEC require client specific medical screening as part of their onboarding process which may subjected to project allocation of the employee upon arrival. Upon arrival employee he has been completed an occupational health questionnaire by BCEC OHN and recording the findings on Attachment - 4 and that has to be submitted to HR for employee personnel file.

### 7.2 Records

All original medical records are kept in the employee's personnel folder by HR and never shared to anyone otherwise received a consent from employee to HR. Medical surveillance outcome with recommendation must be shared to QHSE Manager and HR Manager upon completion of each surveillance as required

Occupational health records will be maintained and stored in keeping with professional and legal guidelines. There are also specific regulations governing the retention of medical records. Occupational health records will be retained in accordance with the standards below Table#3:



Table-3 / Particulars of records and retention period

Types of Records	Years Retained	Reason
Sickness Absence	3 years	To check for patterns of ill-health that could highlight possible work-related causes, or the onset of disability
Non – statutory medical records	12 years	
COSHH Regulations	40 years	To identify any negative health effects resulting from exposure to dangerous substances at work.
Lonizing Radiation Regulations	40 years of the date of the last entry	
Asbestos	40 years	To show that employers have met any legal conditions to carry out health surveillance of their employees.
Lead	40 years	

Information obtained by the Human resources / occupational health provider is strictly confidential and cannot be divulged to any other source without the consent of the employee. Access to this information is in accordance with strict legislative requirements.

Following medical assessments or health surveillance, HSEQ Manager will be provided with a report that confirms that an individual has been examined by Health Practitioner and is fit or otherwise for normal duties

Where staff is deemed unfit for normal duties, where appropriate, human resources / Health practitioner will obtain an individual's consent to disclose relevant information to Managers.

### 7.3 Annual Health Plan

Annual Health Plan focus on the analysis of most common occupational health issues that our employees encounter. This may be muscular-skeletal, communicable disease, diet and exercise etc. Project Manager and HSE lead shall be coordinated with BCEC – OHN and company CSR team. Annual health plan covering spot checks, monthly health awareness and training programs / campaigns etc. health surveillance and audits.

Table - 4 / Schedule of annual health plan

Annual Health Plan	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEPT	OCT	NOV	DEC
Health awareness	X	X	X	X	X	X	X	X	X	X	X	X
Health Surveillance	X		X		X			X		X		X
Spot Health Checks		X		X								
Reviews of health records	X	X	X	X	X	X	X	X	X	X	X	X
Campaigns on Health and Hygiene			X			X			X			X
Health Audit						X						X

### 7.4 Periodic medical screening

Employee's health is one of important matter for a healthy business perspective and BCEC is planned periodic medical examinations planned as per below table. The frequency and content of examinations will vary, depending on the nature of the work and exposures. Comparison of sequential medical reports with baseline data is essential to determine health trends that may mark early signs of adverse health effects, and thereby facilitate appropriate protective measures.

Table- 5 / Periodic Medical Screening Requirements

Particulars	Age Group	Frequency of Medical Evaluation by a Health Practitioner	Medical Screening by OHN	Medical form to be used
All employees except special categories below	Under 40 years	4 years	2 years	Attachment-3
	Over 40 years	2 years	2 years	Attachment-3
	Over 60 years	Annually	Annually	Attachment-3
<b>Special</b>				
Operators and drivers	Under 40 years	4 years	Annually	Attachment-3
	Over 40 years	2 years	Annually	Attachment-3
	Over 60 years	Annually	Annually	Attachment-3
BA / RPE Users	Under 60 years	2 years	Annually	Attachment-3
	Over 60 years	Annually	Annually	Attachment-3
Food / Water handlers	Any age group	Annually	Annually	Attachment-3
Sand blasters	"	2 years	Annually	Attachment-3
Painters	"	2 years	Annually	Attachment-3
Water tank drivers	"			Attachment-3
Rigging and lifting staff	"	2 years	Annually	Attachment-3
Any special cases reporting from health surveillance	"	2 years	Annually	Attachment-3
Offshore staff	As per QP / Opito standard	As per QP / Opito standard	Annually	Attachment-3

Note: Any employees below 40 years having >20% CVS profile required annual medical check. For CVS profile follow; <https://www.cvdriskchecksecure.com/FraminghamRiskScore.aspx>

### Daily Take 5 process – check for FTW prior to commencement of work

#### Exemptions

In exceptional circumstances, e.g. very rapid mobilization by a specialist contractor for one-off short duration deployment, exemptions from some of the Contractor FTW process requirements described in this document may only be approved on a case by case basis by the BCEC Project or delegate. In providing the derogation, the manager or delegate should liaise with BCEC health professional to confirm the appropriateness of the worker's alternative medical certification.

All people required to work on BCEC projects including sub-contractors are required to undertake a Fitness to Work (FTW) medical assessment. The minimum components of the FTW medical depend on the tasks that will be performed. Refer to Table 6 below.

Assessment required	All Project workers <sup>1</sup>	Additional Duties					
		Tight Seal Respiratory Protection	Emergency Response & Rescue Team	Crane Operator	General Trades	Professional Driver	Food Handling Staff

Table 6: BCEC FTW Requirements

Assessment required	All Project workers <sup>1</sup>	Additional Duties					
		Tight Seal Respiratory Protection	Emergency Response & Rescue Team	Crane Operator	General Trades	Professional Driver	Food Handling Staff
General Health Questionnaire	√	√	√	√	√	√	√
General Physical Examination (e.g. musculoskeletal, cardiovascular, respiratory, neurological, ENT, psych, pregnancy <sup>2</sup> )	√	√	√	√	√	√	√
Biometrics (Height, Weight, <sup>3</sup> BMI, Bi-deltoid measurement, <sup>3</sup> blood pressure, heart rate)	√	√	√	√	√	√	√
Visual acuity and fields	√	√	√	√	√	√	√
Urine Drug & alcohol	√	√	√	√	√	√	√
Hearing (Audiogram) <sup>4</sup>	√	√	√	√	√	√	√
Cardiovascular Risk Score <sup>5</sup>	√	√	√	√	√	√	√
Spirometry <sup>6</sup>		√	√				
Epworth sleep apnoea screening				√		√	
Ishihara Colour Vision					√		

## 9.0 TERMINATION / ILL HEALTH RETIREMENT

The Company's priority is always to achieve satisfactory levels of attendance. Where an employee has health problems which are affecting the operational needs of the service, and reasonable attempts to resolve these problems (for example through management, support, reasonable medical care) have proved unsuccessful then it may become necessary to terminate the employment of a staff member.

At the end of employment, where employees are worked in a hazardous environment, the personnel should have a medical examination similar to pre-employment examination. This examination may be limited to obtaining an interval medical history of the period since the last full examination (consisting of medical history, physical examination and laboratory tests) if all three following conditions are met;

- The last full medical examination was within the last 6 months
- No exposure occurred since the last examination
- No symptoms associated with exposure occurred since the last examination

In any these criteria are not met, a full examination is medically necessary at the termination of employment.

## 10.0 COMPLIANCE, AUDIT & REVIEWING PERFORMANCE

### 10.1 COMPLIANCE

#### Compliance to the Qatar Labor Law

Following are the regulatory requirements mentioned in Qatar Labor Law which is complied with this procedure. All these requirements are incorporated in BCEC Legal and other requirements:

- Part Three – Regulation of the employment of workers, Article - 23
- Part Seven – Regulation of the working hours and leave, Articles - 73, 74 & 75,
- Part Nine – Employment of women, Articles 96
- Part Ten – Safety, vocational health and social care, Articles - 104, 105, 109
- Ministry of Labour and Social Affairs – Ministerial Decree no. 16 of 2007

Compliance to the requirement is starts from mobilization of employees to the COMPANY. HR / Administrative department will coordinate the preemployment medical as per this procedure section – 7 and project management team will be ensuring the specific requirements to the projects are complied. Periodical medical check-up and health surveillance are subjected to this procedure section 6.2, 6.3, 6.4, 6.6 and 6.7

### 10.2 AUDIT

Compliance with this procedure will be verified on quarterly basis on self-assessment and annually through internal audit or clubbed with project internal audit.

### 10.3 REVIEWING

This document will be reviewed and revised once in three years to ensure it remains current. The outcomes of measuring and auditing will be monitored by the HSEQ Manager and any significant outcomes will be communicating to senior management team by HSEQ Manager.

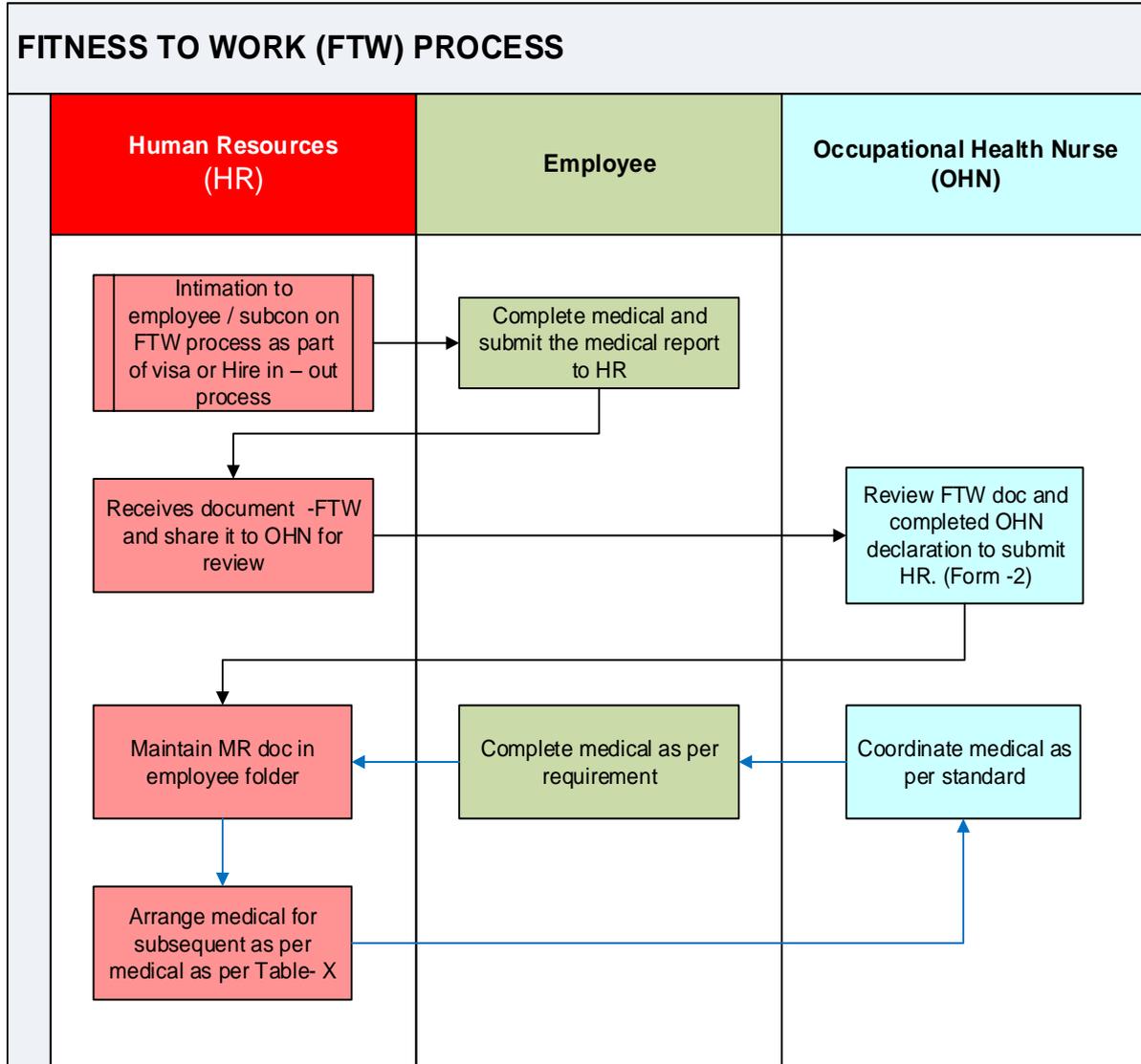


## 11.0 REFERENCES

Document Title	Document No.
<b>CONTROL PROCEDURES (CP)</b>	
Qatar Labor Law	- Part Three – Regulation of the employment of workers, Article - 23 - Part Seven - Regulation of the working hours and leave, Articles - 73, 74 & 75, - Part Nine – Employment of women, Articles 96 - Part Ten – Safety, vocational health and social care, Articles - 104, 105, 109
Managing Construction health risks / Health and Safety Executive – UK	HSG150
Health Management in the oil and gas industry 2019	IOGP Report 343
Medical requirements –QP	QP-OHH-STD-011
Occupational Health and Safety management systems	ISO 45001:2018
Heat Stress Management	BCEC/HSE/GL/004
Incident Notification, Investigation and Reporting	BCEC/HSE/CP/010
Chapter – 6 / Company Leaves	BCEC/HRD/001



**12.0 FLOWCHART ON FTW PROCESS**



Procedure No.: BCEC/HSE/CP/032  
Effective: 09.12.2019  
Issue Date: 09.12.2019  
Revision No.: 0

## ATTACHMENTS



**Attachment No. 1 – PRE-EMPLOYMENT MEDICAL EVALUATION REPORT (3 pages)**

**BLACK CAT** القط الأسود للهندسة والإنشاءات ذ.م.ج  
 ENGINEERING & CONSTRUCTION W.L.L.  
 Member of **QIPCO**

### Pre-Employment Medical Evaluation Report

PART-1 (To be filled by employee)										
Name of Employee				Employment Number						
Designation				Contact Number						
Birth Date:			Nationality:			Country of Birth:		Religion:		
<input type="checkbox"/> Male	<input type="checkbox"/> Single	<input type="checkbox"/> Widow (e)	<i>Relationship to the employee</i>				Number of children:			
<input type="checkbox"/> Female	<input type="checkbox"/> Married	<input type="checkbox"/> Divorced / Separated	<input type="checkbox"/> Wife	<input type="checkbox"/> Son	<input type="checkbox"/> Daughter					
Reason for employment			<input type="checkbox"/> Pre-employment		<input type="checkbox"/> BCEC		<input type="checkbox"/> CONTRACTOR			
			<input type="checkbox"/> Pre-Overseas		<input type="checkbox"/> HIRE		<input type="checkbox"/> VENDOR / OTHER			
List your last 3 jobs:					Type of job assigned:					
(1)					Area / Project assigned:					
(2)					Do you belong to any medical insurance scheme				<input type="checkbox"/>	
(3)					Are you registered disabled person				<input type="checkbox"/>	
DO YOU HAVE OR HAVE YOU HAD: - (Tick "Yes" or "No" Column or put a (?) if uncertain exclude minor ailments.)										
		Y	N			Y	N			
1	Sinus Trouble			22	Heat Disease			42	Awarded benefits for industrial injury / illness	
2	Neck swelling / glands			23	Rheumatic Fever			43	Treated for a mental condition. Eg: Depression	
3	Difficulty in vision			24	Abnormal heartbeat			44	Treated for alcohol or drug abuse	
4	Any ear discharge			25	High blood pressure			45	Exposed to toxic substance or noise	
5	Asthma / bronchitis			26	Stroke			<b>FOR WOMEN ONLY</b>		
6	Hay fever / other allergy			27	Serious chest pain			<b>Have you ever had?</b>		
7	Any skin trouble			28	Any blood disease			46	An abdominal smear	
8	Tuberculosis			29	Kidney disease			47	Any gynecological treatment	
9	Shortness of breath			30	Painful passage of urine			48	Are you pregnant	
10	Coughed / vomited blood			31	Blood in urine			49	HAVE YOU HAD AN ILLNESS NOT MENTIONED ABOVE	
11	Severe abdominal pain			32	Diabetes					
12	Stomach ulcer			33	Headaches / migraine					
13	Recurrent indigestion			34	Dizziness / fainting					
14	Jaundice or hepatitis			35	Epilepsy or Seizures					
15	Gall Bladder disease			36	Joints / spinal trouble					
16	Marked change in bowel habits			37	Surgical operation					
				38	Serious accident / fracture					

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17	Blood in stools (motions)			39	Tropical Disease						
18	Marked change in weight			40	Fear of heights						
<b>Have you ever been</b>											
19	Varicose Veins			41	Rejected for employment or insurance for medical reasons						
20	Lump in breast / armpit										
21	Cancer										
How much tobacco each day?					Average daily alcohol consumption:						
FAMILY HISTORY											
Diabetes	<input type="checkbox"/>	Tuberculosis	<input type="checkbox"/>	Epilepsy	<input type="checkbox"/>	Asthma	<input type="checkbox"/>	Eczema	<input type="checkbox"/>		
Heart Disease	<input type="checkbox"/>	High blood pressure	<input type="checkbox"/>	Stroke	<input type="checkbox"/>	Blood Disease	<input type="checkbox"/>	Cancer	<input type="checkbox"/>		
PLEASE READ THE FOLLOWING STATEMENT AND IF YOU AGREE KINDLY SIGN IT:											
I declared these statements to be true to the best of my knowledge and belief and I agree that the results of this medical examination in general terms may be revealed to the Company if required, and the details sent to the doctor if this is considered necessary by the examining medical staff / OHN.											
Date:					Signature of Employee/Applicant:						

PART – 2 / For completion by examining Physician or Occupational Health Nurse (OHN)													
Further details of medical history and recreational activities													
N= Normal, A= Abnormal (please describe)		PHYSICAL EXAMINATION											
N	A												
		1. Eyes & Pupils											
		2. E.N.T											
		3. Teeth & Mouth											
		4. Lungs & Chest											
		5. Cardiovascular System											
		6. Abdo, Viscera											
		7. Hernial Orifices											
		8. Anus & Rectum											
		9. Genito – urinary											
		10. Extremities											
		11. Musculo - Skeletal											
		12. Skin & Varicose Veins.											
		13 C.N.S.											
Height* Cm	Weight* Kg.	BMI*	BP*	PULSE*	HEARING (Whispering* / Audiogram)	VISION*	DISTANT		NEAR		Color* Vision	Blood* Group	
					L-	Uncorrected							
					R-	Corrected							
N	A	LABORATORY AND SPECIAL INVESTIGATIONS					N	A					
		1. Urinalysis							6. Audiogram				
		AS INDICATED (2-11)							7. Lung Function				
		2. Hb Blood count ESR							8. Chest X-Ray				
		3. Serum Profile							9. Drug Screen				
		4. Stool							10. CR Screen + Country Request (eg. H.I.V.)				
		5. E.C.G							11 Others				

\* Indicated can be done by a registered OHN, Other parameters to be examined by licensed clinic

<b>OTHER FINDINGS</b>			
<b>ASSESSMENT</b>			
<input type="checkbox"/> FIT ALL AREAS <input type="checkbox"/> FIT WITH RESTRICTION <input type="checkbox"/> UNFIT / UNSUITABLE			
Date	Signature	Name	Doctor / OHN

**Attachment No. 2 – HEALTH SURVEILLANCE QUESTIONNAIRE (4 pages)**



المكتب الأسود للهندسة والإنشاءات ذ.م.ج.  
ENGINEERING & CONSTRUCTION W.L.L.  
Member of OIPCO HOLDING

### HEALTH SURVEILLANCE QUESTIONNAIRE

**Information to Employees**

**Important Please Read**

The purpose of this questionnaire is to ensure that your job is not affecting your health. The questionnaire deals with the common health issues that may be caused by your working conditions. The questionnaire only requires you to answer 'YES' or 'NO' and does not ask that you provide more personal information than is required for BCEC to carry out its responsibilities to you. BCEC has a responsibility to make reasonable adjustments to your working conditions if your health affects your ability to do your job.

All information that you provide will be treated as confidential and only the HSE, HR Departments and Site Management will have access to it. All information you provide will be dealt with according to the principles of confidentiality. No information will routinely be divulged without your prior informed consent.

If your responses suggest that there is a need for the questionnaire to be reviewed by our occupational health practitioner (OHN) or similar, it will be reviewed by them for their opinion. It may be necessary, in certain circumstances, for the OHN or Medical practitioner to contact you to discuss your responses. This may require you to visit a medical facility for further diagnosis/treatment.

**Section A / Employee Details (To be completed by Employee)**

Name: \_\_\_\_\_ Empl. Number: \_\_\_\_\_

Nationality: \_\_\_\_\_ Project: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date of Birth: \_\_\_\_\_

**Section B / Health Details (To be completed by Employee)**

**NOISE – PLEASE CIRCLE ANY APPROPRIATE PROBLEMS OR DETAIL FURTHER INFORMATION**

	Circle as Required	
Would you consider yourself to have problems with your hearing?	YES	NO
Have you ever had a burst ear drum/surgery or any other injury to your ears?	YES	NO
Have you ever been in an explosion, fired guns or been exposed to sudden loud noise?	YES	NO
Have you ever taken any long-term drugs e.g. Quinine, Streptomycin, Septrin or Gentamycin?	YES	NO
Is there any ear disease or deafness in your close family?	YES	NO
Do you have difficulty hearing conversation against a noisy background?	YES	NO
Do you suffer from ringing in your ears?	YES	NO

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## HEALTH SURVEILLANCE QUESTIONNAIRE

<b>SKIN - PLEASE CIRCLE ANY APPROPRIATE PROBLEMS OR DETAIL FURTHER INFORMATION</b>		
<i>Have you had any of the following;</i>		
Redness or itching?	YES	NO
Cracking or blistering?	YES	NO
Flaking or scaling?	YES	NO
Dryness?	YES	NO
Did any of the above last for more than a week?	YES	NO
Have any of the above occurred more than once?	YES	NO
Did any of the above clear once you were away from work?	YES	NO
<b>LUNG FUNCTION - PLEASE CIRCLE ANY APPROPRIATE PROBLEMS OR DETAIL FURTHER INFORMATION</b>		
<i>Do you or have you suffered from any of the following:</i>		
Asthma/Bronchitis / allergy / hayfever / pneumonia / other lung disease? <i>(please circle)</i>	YES	NO
Heart Disease / Blood Pressure / chest pain / palpitations / angina? <i>(please circle)</i>	YES	NO
Fits / faints / blackouts / head injury / dizziness? <i>(please circle)</i>	YES	NO
Anxiety / depression / "nerves" / claustrophobia / psychiatric illness? <i>(please circle)</i>	YES	NO
Muscular or Skeletal Injuries	YES	NO
Eyesight problems, (other than normal spectacle use)	YES	NO
Diabetes/thyroid problems?	YES	NO
Do you have any phobias that may be related to your workplace?	YES	NO
Do you experience any shortness of breath on climbing a flight of stairs or walking up hills?	YES	NO
Are you currently taking any prescription or regular over the counter medication?	YES	NO
<b>BACK PAIN - PLEASE CIRCLE ANY APPROPRIATE PROBLEMS OR DETAIL FURTHER INFORMATION</b>		
Do you or have you ever had pains in your back?	YES	NO
Do areas of your back often feel tender?	YES	NO
Is your movement restricted?	YES	NO
Do you suffer from any pain in your buttocks or legs?	YES	NO

### HEALTH SURVEILLANCE QUESTIONNAIRE

HAND ARM VIBRATION - PLEASE CIRCLE ANY APPROPRIATE PROBLEMS OR DETAIL FURTHER INFORMATION		
Have your fingers ever gone white on exposure to the cold?	YES	NO
Have you suffered from tingling in your fingers?	YES	NO
Do any of you fingers go numb?	YES	NO
Have you ever suffered from a loss of grip strength in either or both your hands?	YES	NO
have you ever had pain in your wrists/arms? (please circle)	YES	NO
Do you have a reduction in sensation of touch in any of your fingers?	YES	NO
Are you experiencing any other problems with the muscles or joints of your hands / arms such as pain, swelling, stiffness or weakness?	YES	NO
Has there been a reduction in how well you can do fiddly and fine tasks e.g. doing up shirt buttons?	YES	NO

GENERAL		
Do you Suffer from Colour Blindness?	YES	NO

Employee Declaration

I declare that, to the best of my knowledge the above information is correct. I agree to this form being forward to the company's occupational health provider to be reviewed and stored as appropriate.

NAME & SIGNATURE	DATE
------------------	------

## HEALTH SURVEILLANCE QUESTIONNAIRE

### Section C / To be completed by Authorized Reviewer

#### Guide to Reviewer

If there are any 'Yes' responses, tick box A and forward the questionnaire to the HSEQ Manager HR Manager for a referral.

If all responses are 'No', tick box B and forward the questionnaire to the HR Dept for filing and confirm with the employee that there are no issues at this time.

<b>A)</b>	Questionnaire requires review by OHN / HSSE	
<b>B)</b>	No review required	

**Signature:** \_\_\_\_\_

**Print Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Date:** \_\_\_\_\_



**Attachment No. 3A – SICKNESS / INJURY SELF-CERTIFICATION FORM**

	
<b>Sickness / Injury Self-Certification Form</b> <i>(to be completed by Employee)</i>	
This form is to be completed for following circumstances 1. Whenever you have absence from work because of illness or injury 2. A non-occupational leave 2 days or below Appendix-2A to be filled by employee and if absence exceeds 2days or more Appendix – 2B to be attached 3. Returning to work, after a sickness or accident from annual vacation	
It must be completed and signed by your immediate line manager or (where this is not practical) be countersigned by an appropriate nominated management representative, e.g.: foreman, supervisor, manager, head of department.	
Note: - Should the absence exceed 7 days, a certificate(s) signed by a Consulting Doctor together with fit to work required.	
Employee Number:	Department:
Name of Employee:	Job Title:
I certify that I was unable to attend work due to sickness / injury between:	
Date and time of first absence	
Date and time of return to work	
I certify that I was hospitalised due to sickness / injury between: <i>(During vacation)</i>	
Date and time of hospital admitted	
Date and time of hospital discharged	
Please tick nature of illness / injury:	
Back problems	<input type="checkbox"/> Chest / respiratory
Eye / ear / nose and mouth / dental	<input type="checkbox"/> Genito urinary
Headaches / migraines	<input type="checkbox"/> Heart / blood pressure / circulation
Operation / post-operative recovery and other hospital treatments	<input type="checkbox"/> Other muscular and skeletal problems
Flu / cold	<input type="checkbox"/> Sickness and diarrhoea
Stress / depression and mental health	<input type="checkbox"/> Stomach / liver / kidney / digestion
Dermatology	<input type="checkbox"/> Viral infection
Other (please state):	<input type="checkbox"/> Details:
Have you consulted your Doctor regarding this illness?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
If yes, state Doctor's name:	
Address:	
In understand that if I provide inaccurate or false information about my absence or illness, it may, depending on the circumstances, be dealt with under the disciplinary process. I agree to this information being held on my personnel file, under the guidelines provided by the Data Protection Act.	
Signed by Employee:	Date:

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**Attachment No. 3B – SICKNESS / INJURY RETURN TO WORK INTERVIEW**

Sickness / Injury - Return To Work Interview	
<i>(to be completed by OHN or Line Manager)</i>	
Date absence commenced:	Date of return to work:
<i>If using this form to notify absence, indicate expected date of return:</i>	
Date of Hospitalisation	to
Have they visited a doctor?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
Is the employee fully recovered?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <i>(If not, give further details)</i>
Has the employee suffered from the same illness in the last 12 months?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
Is there any expectation of the illness re-occurring in the next 12 months?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
Does the employee consider the injury / illness to have been caused or made worse by their work / work environment?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
Company Action	
Appointment with Company doctor required?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
Access to Medical Record required?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
Employee's attendance to be reviewed?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> Review period:
Changes to workplace and / or duties to be considered? <i>(If yes, please give details)</i>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> Details: <i>(use a separate sheet if necessary)</i>
<b>Comments:</b>	
Return to work interview held (date):	Conducted by (OHN name & signature):
Employee signature: <i>(if completing electronically, please key in name)</i>	Line Supervisor / Manager signature: <i>(if completing electronically, please key in name)</i>
<i>Form to go to HR / Admin Department who will note receipt and keep into retention on personnel file and a copy to OHN for notification. If any Occupational Health or Restricted duties or injuries, HSE dept must be notified</i>	
BCEC/HSE/QS-121-01/REV.0/26.09.2019	

**Attachment No. 4 – BLACK CAT HEALTH SELF-DECLARATION QUESTIONNAIRE**



**BLACK CAT HEALTH SELF DECLARATION QUESTIONNAIRE**  
**FOR WORKERS, STAFF & SUBCONTRACTORS**  
CONFIDENTIAL INFORMATION

**EMPLOYEE DATA**

EMPLOYEE NO.		DATE	
FIRST NAME		LAST NAME	
DATE OF BIRTH		AGE	
GENDER	<input type="checkbox"/> MALE <input type="checkbox"/> FEMALE	NATIONALITY	
DESIGNATION		CONTACT NO.	

**MEDICAL HISTORY (YOU)**

		YES	NO
1	Are you currently being treated for any illness or injury by a Doctor or other person?	<input type="checkbox"/>	<input type="checkbox"/>
2	Are you allergic to any food, medicines or any kind of material or substance? <i>if yes please write:</i>	<input type="checkbox"/>	<input type="checkbox"/>
3	Have you ever been hospitalized for more than 1 day?	<input type="checkbox"/>	<input type="checkbox"/>
4	Do you smoke Cigarettes? Or Chew tobacco?	<input type="checkbox"/>	<input type="checkbox"/>
5	Are you doing regular physical activities such as walking, running, at least 3x a week?	<input type="checkbox"/>	<input type="checkbox"/>
6	Are you currently taking any kind of medication? <i>Please list:</i>	<input type="checkbox"/>	<input type="checkbox"/>
7	Do anyone from your family suffer from or have died of heart disease?	<input type="checkbox"/>	<input type="checkbox"/>
8	Any other health problems, accidents or fractures that may affect you to do your job? if yes please state the reason:	<input type="checkbox"/>	<input type="checkbox"/>
9	Have you ever had or been told by a Medical Doctor that you had any of the following?	<input type="checkbox"/>	<input type="checkbox"/>
a	High Blood Pressure?	<input type="checkbox"/>	<input type="checkbox"/>
b	Heart disease, chest pain, palpitations, irregular heart rate or heart surgery?	<input type="checkbox"/>	<input type="checkbox"/>
c	Abnormal shortness or difficulty of breathing?	<input type="checkbox"/>	<input type="checkbox"/>
d	Asthma?	<input type="checkbox"/>	<input type="checkbox"/>
e	Head injury, spinal or any bone injury?	<input type="checkbox"/>	<input type="checkbox"/>
f	Seizures, convulsions, epilepsy, fits?	<input type="checkbox"/>	<input type="checkbox"/>
g	Fainting, blackouts?	<input type="checkbox"/>	<input type="checkbox"/>
h	Stroke?	<input type="checkbox"/>	<input type="checkbox"/>
i	Dizziness, vertigo, problems with balance?	<input type="checkbox"/>	<input type="checkbox"/>
j	Double vision, blurriness, difficulty of seeing?	<input type="checkbox"/>	<input type="checkbox"/>
k	Kidney disease, kidney stones?	<input type="checkbox"/>	<input type="checkbox"/>
l	Diabetes, high blood sugar?	<input type="checkbox"/>	<input type="checkbox"/>
m	Liver disease?	<input type="checkbox"/>	<input type="checkbox"/>
n	Neck, back or limb disorders or injuries?	<input type="checkbox"/>	<input type="checkbox"/>
o	Hearing loss? Difficulty of hearing people on the phone or had an Ear operation or use of hearing aid?	<input type="checkbox"/>	<input type="checkbox"/>
p	Mental health problem or illness or drug or alcohol dependency or misuse?	<input type="checkbox"/>	<input type="checkbox"/>
q	Sleep disorder, sleep apnea, narcolepsy?	<input type="checkbox"/>	<input type="checkbox"/>
r	Have you acquired Chicken pox, Measles, Mumps before?	<input type="checkbox"/>	<input type="checkbox"/>

I, \_\_\_\_\_ (PRINT NAME), certify that to the best of my knowledge that all information provided above are true and correct.

**SIGNATURE / DATE**

BCEC/HSE/Q/S-122/REV.0/26.09.2019

**Attachment No. 5 – OCCUPATIONAL HEALTH QUESTIONNAIRE (3 pages)**



**Occupational Health Questionnaire**

<b>FIRST NAME:</b>		
<b>LAST NAME:</b>		
<b>DATE OF BIRTH:</b>		
<b>SEX:</b>	Male	Female
<b>DESIGNATION:</b>		
<b>EMPLOYEE NUMBER:</b>		

**Your Health**  
 Please answer the following questions to the best of your ability. If you answer 'yes' to any question, please give appropriate details in the space provided or in the box below. Please include relevant dates, treatments and lengths of absence from work etc. You may be contacted for further information or asked to attend for a medical assessment, which would be conducted by a specialist Occupational Practitioner.  
**Have you ever suffered from, or been treated for, any of the following:**

CONDITION	YES	NO	DETAILS: Dates etc.
Heart conditions or disease (incl. high blood pressure)			
Circulatory conditions e.g. varicose veins			
Conditions of the stomach or bowels			
Conditions of the kidneys or bladder			
Ear conditions (e.g. hearing difficulties)			
Skin conditions (e.g. dermatitis, eczema, sensitivities, allergies)			
Conditions of the lungs (e.g. asthma, bronchitis, TB)			
Do you ever become short of breath?			
Fits or epilepsy			
Headaches/migraines/fainting spells			
Mental health conditions (e.g. depression, eating disorders)			
Diabetes (or in the family)			
Thyroid or gland disorder			
Speech or communication			
Gynaecological conditions			
Upper limb disorders (e.g. RSI) or Lower limb disorders (injury or disability)			
Blood disease			
Stress necessitating time off work			

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Persistent backache, injury or slipped disc			
Persistent neck pain or injury			
Defect of eyes (e.g. sight, glaucoma, colour blindness)			
Do you need to wear glasses/ contact lenses at work?			
Any manual handling restrictions or previous conditions, including lifting, putting down, pushing, pulling, carrying or moving loads			
Have you ever had back pain sufficient to stop you doing your normal job?			
Jaundice or hepatitis			
Allergies to any substances ie. Drugs, latex			
Arthritis (e.g. rheumatoid, gout)			
Disease of the nervous system (e.g. Parkinson's, Multiple Sclerosis)			
Addiction (e.g. drug, alcohol)			

CONDITION	YES	NO	DETAILS: Dates etc.
Are you at present receiving any medical treatment or have you received any in the past 12 months? If yes, please give details			
Did this lead to an absence of work? If yes, how long for?			
Have you had any other periods of sickness absence in the past two years? Please give details of sickness and amount of time off work			
Have you had any serious illnesses or operations in the past or are you awaiting any medical appointments. If yes, please give details			
Are you taking any medication, inhalers, injections, creams or eye/ear drops at the moment? If yes, please give details			
Is your ability to perform physical work limited in any way? If yes, please give details			
Have you ever been diagnosed with an occupational ill health condition? If yes, please explain			
Have you had any serious accidents at work resulting in compensation or pension?			
Have you ever failed a medical assessment?			
Have you ever had to change jobs because of a health problem? If yes, please give details			



القبط الأسود للهندسة والإنشاءات ذ.م.م  
ENGINEERING & CONSTRUCTION W.L.L.  
Member of QIPCO HOLDING

do you have any physical or mental health impairments, which significantly affects your ability to carry out normal day-to-day activities? If yes, please give details			
Is there any additional information that you feel is relevant? If yes, please give details			
Details of other conditions not listed above or additional information			

**Occupational History**  
 Have you ever worked in:

Mines/Foundries	Yes	No	_____
Chemical Industry	Yes	No	_____
Rubber Industry	Yes	No	_____
A Noisy Environment	Yes	No	_____

Have you ever worked with:

Vibration Tools	Yes	No	_____
Mineral Oils	Yes	No	_____
Asbestos	Yes	No	_____
Respiratory Sensitisors	Yes	No	_____
Radio-Active Materials	Yes	No	_____

Any other relevant information:

**Declaration**

To your knowledge, are you fit to perform the duties you are employed to carry out? If no, please give details:	Yes	No

I certify the answers to the above questions are correct to the best of my knowledge and any questions left unanswered may be discussed in any interview arising from this questionnaire. I also agree to a medical examination/health surveillance before and/or during my employment should the company consider it necessary.

Signed \_\_\_\_\_ Date \_\_\_\_\_

Viewed by Occupational Health Nurse \_\_\_\_\_ Signed \_\_\_\_\_

Date \_\_\_\_\_

Page 3 of 3

BCEC/HSE/QS-123/REV.0/26.09.2019

## Department Objectives

Date: January 3, 2021

### HSE&S Objectives 2021

1. Maintain compliance with all applicable HSE Legal/ Regulatory requirements.
2. Protect personnel from any health hazards that may be associated with the work and COVID -19 through strict adherence, implementation and monitor all precautionary measures stipulated by WHO, MOI & MoPH.
3. Provide accident-free environment by engaging in and maintaining organizational behavior through effective involvement of management and workers at site HSE walkthroughs, audits and HSE meetings.
4. Develop strategies to reduce ecological footprint (reduce use of water, paper, energy etc.) and enhance waste management programs through awareness, proper waste segregation, recycling and disposal methods.
5. Ensure KPI targets are met (refer to attached HSE KPI).

Prepared by:



**JERRY FRANCIS**  
HSE&S Coordinator

Reviewed by:



**JOHN HICKEY**  
General Manager

Approved by:



**PAOLO BORCHETTA**  
Chief Executive Officer

Note: Above objectives will be reviewed and may be revised during MRM.  
Refer to BCEC/IMS/005/F-003 for Objective Register.

## HSE KPI's 2021

PERFORMANCE INDICATORS		TARGET
<b>Leading</b>	Action close outs (HSE Observations, Findings)	> 75%
	Health check-up / Fitness assessment – (Planned Vs Completed)	> 75%
	Training – (Planned Vs Completed)	> 80%
	Management participation (walkthrough) Attended Vs Scheduled	> 75%
	Environmental Incidents Severity >6 (RAM)	0
<b>Lagging</b>	Lost Time Injury Frequency Rate (LTIFR)	< 0.03
	Total Recordable Injury Frequency Rate (TRIFR)	< 0.13
	Motor Vehicle Accidents Frequency Rate (MVAFR)	< 0.5

Black Cat Management and Employees is committed to create a sustainable business and Stakeholders Value through continuous improvement and execution excellence.

We are committed to providing sustainable, and high standards of Quality in Design & Engineering, Procurement, Installation and Commissioning services to ensure:

- ✓ Customer satisfaction with required specifications
- ✓ On time delivery through efficient utilization of resources
- ✓ Safe working practices to prevent injury or adverse health effects
- ✓ Identification and management of risk
- ✓ Conservation of resources
- ✓ Protection of our environments through continuing focus on environmental aspects and elimination or mitigation of potential impacts
- ✓ Compliance with applicable legislation and regulations
- ✓ Adherence to the UN sustainable development goals in the four areas encompassing the Ten Principles of United Nations Global Compact: Human Rights, Labour, Environment and Anti-Corruption

Our success will be achieved through leadership championing of a culture that promotes the effective management of risks, encourages innovation, Quality, Health, Safety, respect for the Environment, and Social Responsibility.

The leadership team are committed to, and responsible for providing the necessary working environment, organizational optimizations, processes, resources, training, and awareness programs to achieve our objectives.

Our progress toward achieving leading performance in the Integrated Management System (IMS) will be measured by leading and lagging indicators and reported with reference to our annual objectives and targets.

The development and implementation of our IMS and procedures shall be subject to both internal and external audit for compliance in accordance with our certification to the current version of ISO 9001; ISO 45001; ISO 14001 and ISO 26000.

This policy will be displayed prominently at all work places and will be reviewed periodically.



**PAOLO BORCHETTA**  
Chief Executive Officer

# HEAT STRESS EMERGENCY PREPAREDNESS & RESPONSE DRILL

PROJECT NAME: WATER WASH PROJECT (LPU –TRAIN 01)

Contract No: (P-810200)



## INTRODUCTION

An emergency mock-up Exercise has been carried out to ensure the readiness for the emergency response during the Project Activities of Water Wash Project (P-810200) at LPU-1 Area.

## LOCATION & SCHEDULE

Date of drill	:	8th July 2021
Time of drill	:	0900Hrs - 0930Hrs
Location	:	LPU-1 – Main Block
Team Involved	:	The work crew involved in Mechanical & Scaffolding Work.

## OBJECTIVES

The objectives of the drill is as follows

- Familiarize the project personnel about the Emergency response during Heat Stress/ Illness.
- To check the response of personnel involved in the activity.
- To check the response of First Aiders
- Practice the Emergency communications and responsiveness.
- To check the response of Permit Holder and HSE Advisor.
- To check the response of FO / FIT Team



## PARTICIPANTS:

### BCEC mock drill team

Mr. Saroj kumar Dalai (IP)

Mr. Suresh kumar (Work Supervisor)

Mr. Vijayendran (First Responder)

Mr. Sreeraj T Raju (First Aider)

### QSGTL FIT & MEDIC TEAM

Mr. Manny L

Mr. Hari Bahadur

Mr. Saleh

Mr. Larry Smith

Mr. Santhosh

Mr. Gerald Howard

### OBSERVERS

Mr. Vinod Kumar –FO –QSGTL

Mr. Vivek Nair - Worley

Mr. Peter Bell –Black cat

Mr. Gouthamendra Awari – Black cat

Mr. Dingle Xavier – Black cat



## MOCK DRILL SCENARIO:

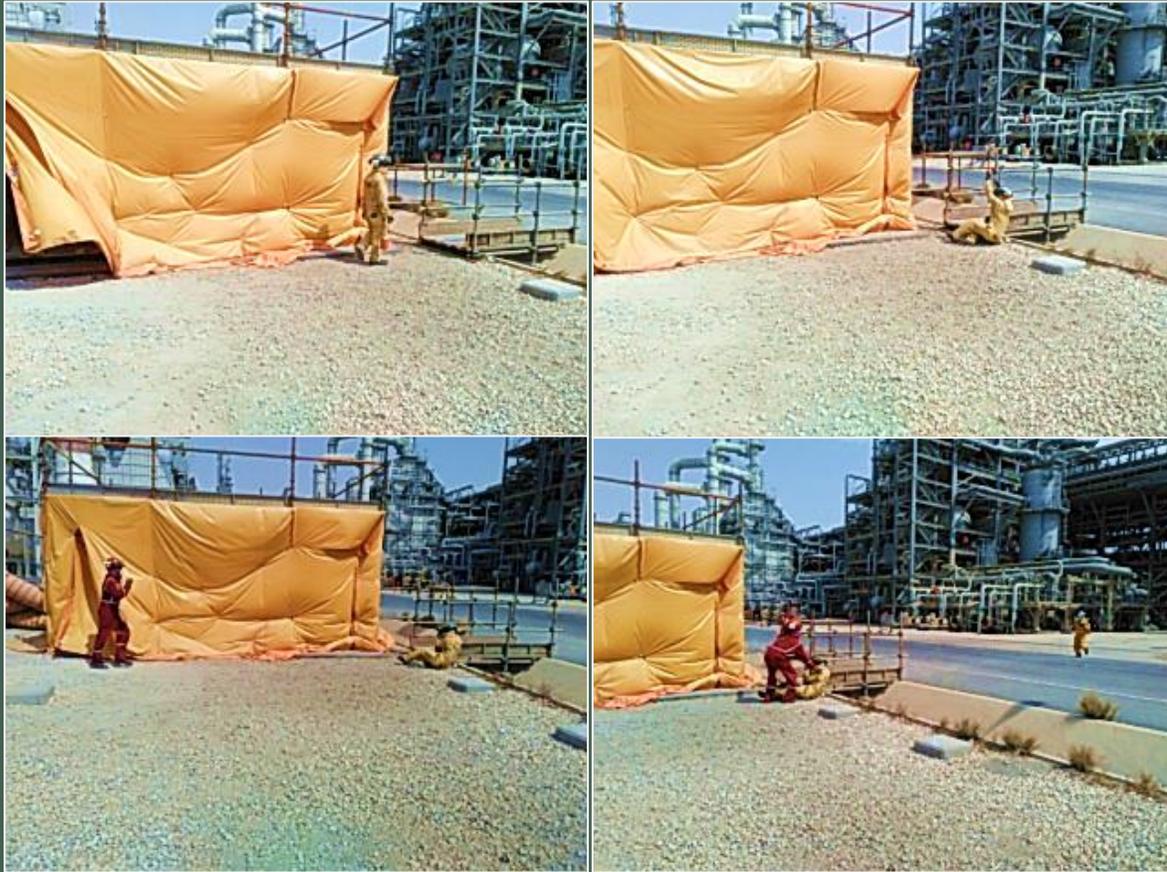
- During work activities of the Water Wash Project at LPU-1 Area, one of the project employee get fainted (simulation) while approaching to the Drinking water station for collecting the water in his personal water flask.
- Person in the vicinity (First Responder) immediately rush to the fainted Person for necessary assistance.
- First responder then immediately notifies the First aider available at site and Notifies to QSGTL Emergency Number for necessary Medical assistance. First Responder also will notify Field Operator / FO about the emergency.
- Upon receiving the emergency call, the Medical proceed to site for providing necessary medical support and attend the case.



## RESOURCES USED

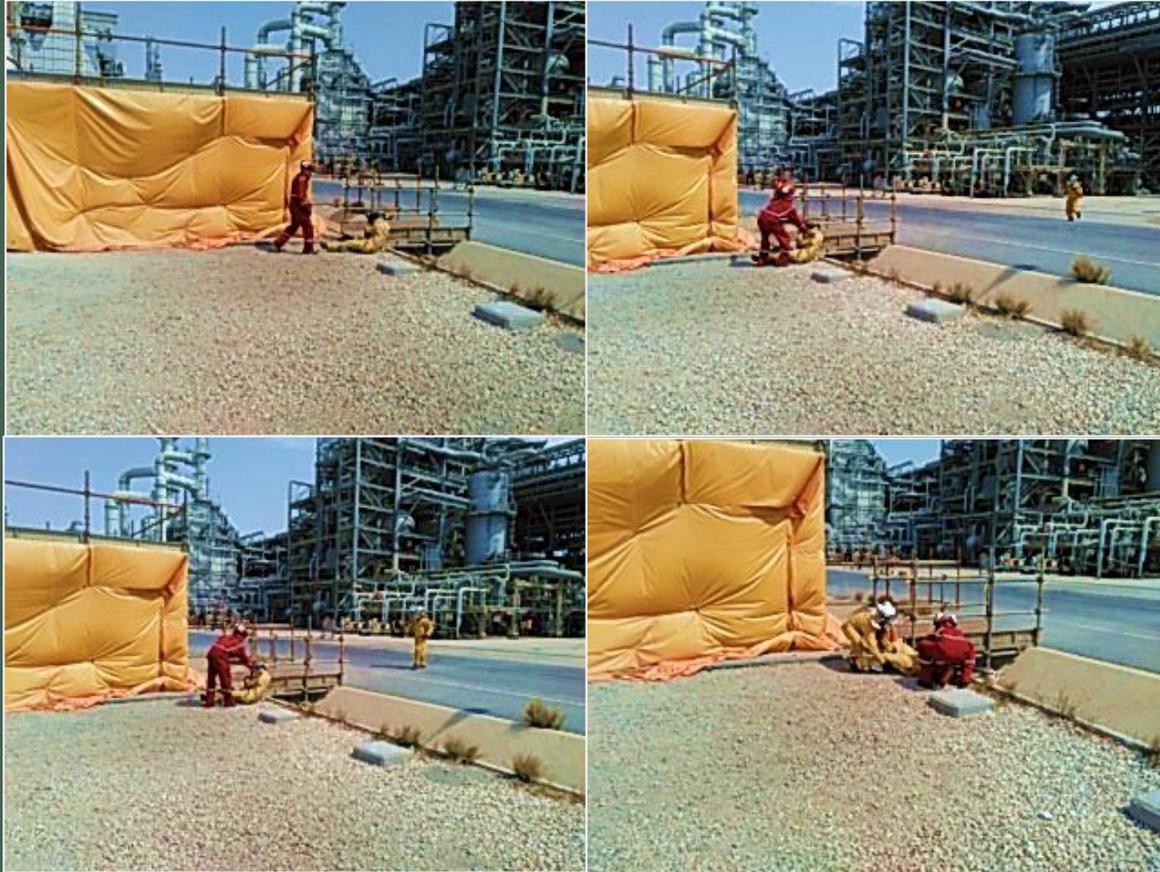
- AC Rest shelter, First aid box, , Hand sanitizer etc.
- IS cell phones
- QSGTL FIT/Medic team with Necessary equipment including ambulance, medic kits, stretcher etc.
- Mandatory PPEs for COVID 19 – Surgical gloves, mask etc.
- Trained Flagman to guide the emergency vehicle
- IS cameras – Photography permit obtained





*One project employee gets fainted (simulation) while approaching to the Drinking water station for collecting the water in his personal water flask.*





*First Responder rush to the Fainted person for necessary support*

*First Responder notified the First Aider & Supervisor for necessary assistance.*





*First Responder  
contacted QSGTL  
Emergency contact  
number 44198000 and  
requested for medical  
assistance*





*FIT /paramedic team  
arrives to the work  
location with  
Ambulance.*





*FIT Team attends to the Fainted Person and get the details from First Aider and First Responder*



*Conclusion meeting  
conducted.*

*Observation and  
recommendations  
shared by everyone  
participated*



## Observations/Recommendations

### Positive Observations

1. Good communication and coordination noted during the drill scenario
2. Fit team/Paramedic team was guided from LPU BRM to the drill location by assigned flagman
3. First aider was using N95 mask as a part of covid19 prevention protocol
4. Response from supervisor was quick- Immediately reported to ERT/FIT/FO through IS phone
5. FIT/paramedic team arrived at the location with in 07 minutes after the call

### Opportunity for improvement

1. IP was laid on the seats of rest shelter (As per the medical team The IP must be laid on proper floor).
2. Internal Emergency – Incident notification Protocol to be followed and informed accordingly.
3. During Emergency situation, Supervisor need to Call for Additional First Aider to the Incident spot for Adding First aid Services (CPR, If first aider Exhausted).
4. Supervisor informed that employee fainted due to heat stress- As per medic team cause of health condition of the patient must be confirmed by paramedic team only.



# THANK YOU



## 4145-GC19101900 EPIC FOR DPFU PROJECT

### Detailed Schedule on Emergency Mock Drills - Revised

Project Location	ER Drill Scenario	Proposed Date	Name of personnel / Organization to participate				Remarks
			Company	Project HSE	Management Rep	Asset Holder (Optional)	
Temp. Site Office (DKN)	Medical Emergency – COVID-19	Apr 2020	BCEC/ Subcon	√	√	√	Conducted Flowline office
Temp. Site Office (DKN)	Fire	Aug 2020	BCEC/ Subcon	√	√	√	Conducted at Flowline office
DPFU Site Office (DKN)	Fire	Mar 2021	BCEC/ Subcon	√	√	√	Conducted at DPFU Laydown
Fahahil Sector	Toxic Gas Release*	May 2021	BCEC/ Subcon	√	√	√	
Kathiya Sector	Toxic Gas Release*	Jul 2021	BCEC/ Subcon	√	√	√	
DPFU Site Office (DKN)	Chemical Spill	Sept 2021	BCEC/ Subcon	√	√	√	
Jaleha	Toxic Gas Release*	Dec 2021	BCEC/ Subcon	√	√	√	
DPFU Site Office (DKN)	Natural Disaster	Feb 2022	BCEC/ Subcon	√	√	√	
Kathiya Sector	Toxic Gas Release*	Jun 2022	BCEC/ Subcon	√	√	√	
Jaleha	Medical Emergency*	Sept 2022	BCEC/ Subcon	√	√	√	
DPFU Site Office (DKN)	Security	Dec 2022	BCEC/ Subcon	√	√	√	
DPFU Site Office (DKN)	Fire	Feb 2023	BCEC/ Subcon	√	√	√	

Note: \* QP degassing station drills to be conducted after confirmation from asset holder on existing restrictions at QP site

Michael Edwin  
Lead HSE – DPFU Project

Maher Anane  
Project Manager

# ANTI-CORRUPTION

## Ethics & Morals

Defining what **ethics** and **morals** are about shift the dialogue from the abstractions of the many philosophical interpretations of the two concepts, to the realities of the organizations, and of the socio-economic context in which they operate.

**Ethics** is defined as the external standards that are provided by institutions, groups, or culture to which an individual belongs; in this context we will consider Ethic primarily as a **framework for acceptable behavior [normative ethics]**; while **Morals** are also influenced by culture or society, but they are **personal principles created and upheld by individuals** and as such, can be radically changed as result of personal experiences; **Ethics are therefore 'objective', while Morals are 'subjective'**.

Diverse cultural backgrounds tend to inject variable degrees of relativism<sup>1</sup> in the interpretation, and implementation of the established standards – training plays a pivotal role in driving a collective understanding of the established principles of an acceptable [business] behaviors, **irrespective of cultural influences**; [this is particularly relevant in multi-national organizations].

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## A Multi-Dimensional Response to a Multi-Dimensional Problem

How a business should act in the face of ethical dilemmas and controversial situations, and the resulting ethical behaviors framework of corporate principles and standards, needs to be constructed in such a manner that the multi-dimensionality of the problem is addressed.

The regulatory' [compliance] and the stakeholders' dimensions should be considered and given the widespread and complex ramification of the problem, the implementation should factor the need for acting as a company, in concert with global initiatives [collective actions] aimed at fighting unethical practices, among them corruption.

Corruption appears in many guises as identified by the World Economic Forum' Strategic Intelligence unit and has become a multi-tentacular, complex global phenomenon.



While bribery is the most common, electoral fraud, cronyism<sup>2</sup>, state capture<sup>3</sup>, and embezzlement can all have deleterious effects on society. There is no single definition that can capture all the manifestations of corruption, and there has been a paradigm shift in terms of the fight against it - which takes place increasingly through multi-stakeholder collaboration, collective action initiatives specific to sectors, the use of recent technologies, a more expansive 'stakeholder' approach to capitalism, better assessing gender implications, and elevating public awareness. Fighting corruption in all its forms will be essential for truly sustainable development. In this context stakeholders [or interested parties as per ISO], are employees, shareholders, customers, financing institutions, Government agencies, supply chain partners, and NGOs.

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## The Role of Corporation – Ethics & Trust

The 2021 Edelman Trust Barometer reports that businesses are the **only institutions** that are both trustworthy and competent [the repository of 'rational trust']; trust is becoming localized and employers [and business leadership] are increasingly seen as a mainstay of people trust. Governments, media [the biggest losers], and to a smaller extent NGOs, have experienced a flexion in the trust score. The COVID-19 pandemic has increased societal and personal fear and concern of economic repercussions with 84% of the interviewed people citing job loss as the major source of concern [against only 65% citing contracting COVID-19 as a source of concern]; in the eyes of the stakeholders, government and media are failing; employers are at the forefront of addressing these concerns. It is becoming imperative that business act ethically and in a socially responsible manner if they ought to fulfill their economic and social roles effectively; it is not anymore just a matter of abiding by the laws and satisfying shareholders expectations.



# Development of an Ethical Standards Framework

## Driving Understanding & Cultural Shift

The development of an ethical standards framework, and of an effective implementation plan aiming at maximizing its efficacy should be based on maximizing understanding of the economic and social benefits of operating in an ethical manner.

A typical Ethical Standards framework develops from Core Value to Principles to Objectives to Standards, e.g., from the individual to the collective [organization & stakeholders]; as it progresses the framework addresses the specific sector's characteristics based on data and reports collected, considering that some sectors are intrinsically more prone to corruption than others.

During the implementation phase, procedural training shall be continuously reinforced by re-stating the need of a cultural shift toward embracing ethical standards, and the benefit of it.

## Implementation - Educating vs. Policing

It is essential to stage the introduction of the framework in a manner that for an initial period of about 12 months, emphasis is put on educating [and positively reinforcing], rather than policing in tackling possible non compliances; cultural shifts are the harder to accomplish as they cannot effectively be sanctioned but rely on the individual embracing the new cultural framework.

It is essential, in structuring an implementation program, to focus on those internal elements that might hamper an effective implementation and ensure that these are addressed effectively (fear of retaliation in reporting non-conformities, etc.); at the same time, a system of reward should be part of the positive reinforcement mechanisms in place to support the cultural shift.

## Supporting Collective Actions – Adhering to International Initiatives

Given the magnitude of the problem and the need to extend actions beyond the boundaries of each individual company's sphere of influence, joining an international initiative is of paramount importance.

Many companies worldwide subscribed to the United Nations Global Compact [13 in Qatar] and adhere to the UN' Sustainable Development Goals [SDGs] which addressed the elimination of corruption under Principle 10; corruption hamper sustainable development. Membership or subscription to other sector specific initiatives can be considered as well.



## Reporting Progress

It is fundamental for the continuity of the action against corruption, and toward sustainable development, that the organization embraces the practice of reporting progress at regular intervals; this practice has the double benefit of informing the organization about the progress and keeping the momentum, the dialogue, and the focus alive on ethical and social initiatives.

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## Bringing It All Together

An Ethical Standards Framework is one component of a broader set of steps aimed at contributing to sustainable development; a cultural shift, a continuous reinforcement of the positive effects of ethical behavior on the economic and social standing of the business should be in place through continuing education on this front.

Given the enormous impact of the phenomenon, fighting bribery and corruption is of paramount importance, although it remains an intrinsic aspect of ethical behavior; however, corruption comes in a variety of manifestations that transcend the mere economic aspect and impact other equally important social issues, these must be addressed as well to give depth to initiative.

In conclusion, it is essential to realize that the introduction, and implementation of an ethical standards framework, and the adherence to a collective action through membership in international initiatives, cannot be left to the compliance or auditing functions alone, top management leadership and continuous engagement remain essential.



# ANTI-CORRUPTION

## Initiatives includes, but not limited to:

- Anti-corruption Policy has been documented and implemented as per Black Cat's HR Policy and Procedures.
- Assessment of risk relevant to corruption in each department or operations are identified.
- Encourage bids or offers under sealed envelop or cover and those are open in front of Management Committee Members and endorsed by our legal department.
- Black Cat monitor and evaluate financial performance through External Financial Audits conducted by Deloitte.



# SUSTAINABILITY IN SUPPLY CHAIN

- Fair operating practices
- Anti-corruption principles
- Fair competition
- Respect for property rights;

To prevent any kind of cyber attacks, we perform vulnerability assessment & Penetration test.

This activity will bring to light the problems listed below (by way of non- exhaustive example):

- Insecurely configured services;
- Obsolete vulnerable applications;
- Obsolete operating systems.

VA is of fundamental importance for the Risk Assessment process as it allows to define the priorities of remedial actions of an intervention plan to enhance and raise the level of security of its IT infrastructure.

A Penetration Test (PT) consists of simulating a cyber-attack to assess the adequacy of the technical and organizational security measures implemented by your organization. The goal of this mode is to test the resilience of the IT infrastructure and the ability to escalate privileges within the corporate domain to exfiltrate business-critical data.

An external penetration test, instead, simulates a real IT attack as the tester's goal is to break into your organization's IT infrastructure from exposed services. It is possible to perform the external penetration test in the white-box, grey-box, and black-box methodologies, which differ in the amount of information provided to the tester and the organization's staff.



# CHAPTER 3

## HUMAN RESOURCES

# EMPLOYEE AND BUSINESS CODE OF CONDUCT



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## EMPLOYEE AND BUSINESS CODE OF CONDUCT

Responsible conduct by employees is essential for the proper performance of Company business. The Company expects certain behaviors from its employees regarding job attitude and performance. Policies and procedures are designed for the employee to follow acceptable norms of conduct and avoid undesirable actions and behavior so that the Company can achieve its goals and objectives smoothly.

The Company wishes to implement sound employee relations policies and procedures that are in line with the principal objective of maintaining essential discipline and of correcting and improve employees' work performance, behavior and conduct, and for the efficiency of the Company's operations.

BCEC's image and reputation is part of the Company's operation and performance. As such, Company's prestige and standing in the local communities must be maintained at the highest standards.

The Company will conduct its business with honesty, integrity and respect for the interests of its clients, employees, sponsors and partners.

The Heads of Departments are responsible for ensuring that their employees are following the Company's code of conduct requirements, and report to the Human Resources Manager any event of repetitive non-adherence to it.

### Key Processes

The following are the key processes identified in this chapter:

1. Article 1 – Employee Code of Conduct
2. Article 2 – Business Code of Conduct
3. Article 3 – Employee and Business Code of Conduct Guidelines Declaration

### Article 1

#### 1.0 EMPLOYEE CODE OF CONDUCT

#### POLICY

#### 1.1 PROPER CONDUCT RELATIVE TO THE COMPANY'S REPUTATION

##### 1.1.1 CONFLICTS OF INTERESTS

1.1.1.1 The Company expects its employees to avoid any personal activities and financial interest which may conflict with their commitment to effectively perform their jobs. Employees may not undertake any business or employment with out the prior written permission of BCEC. Exception may generally be made for non-profit work and honorary positions related to charities, etc. Employees must not conduct business operations that compete with those of BCEC or engage in other business operations whose scope is such that it infringes the performance of the employee's ordinary duties.

1.1.1.2 Employees should not participate in any activity which creates or appears to create a conflict between his personal interest and the Company's business interest, such as working for the competitors or the customers/clients, contractors, sub-contractors or suppliers of the company or dealing with the company for their own behalf and for personal gain.

- 1.1.1.3 Employees should not use the Company's property, assets or information system for any purpose other than that of the Company's business.
- 1.1.1.4 Employees are expected to be loyal to BCEC at all times while in the employment. They will therefore not engage in any outside employment without prior consent of their Department Manager and pre-approval of the Executive General Manager.
- 1.1.1.5 Where an activity or assignment may be in conflict with BCEC's interests, the employee will refrain from such activities.
- 1.1.1.6 Where employees are unclear about possible conflicts, they should approach their Department or Project Managers for clarification.
- 1.1.1.7 All employees are expected to be courteous and civil when dealing with clients and the public at large.
- 1.1.2 TREATMENT OF THE COMPANY'S INFORMATION / CONFIDENTIALITY**
- 1.1.2.1 Any communication received from a client or member of the public must be dealt with expeditiously and courteously by the designated employee.
- 1.1.2.2 Employees should hold any secret information of the Company, customer information and personal information as strictly confidential and should not divulge such information to any third party, nor should they use the same for any purpose other than that of the business of the Company.
- 1.1.2.3 Employees must not disclose any information concerning BCEC or its employees, or release any official documents to unauthorized persons, unless he is required to do so in the course of duty and such disclosure must be authorized by the Executive General Manager.
- 1.1.2.4 Employees should treat any secret information divulged by a third party as in the same manner as they treat the secret information of the Company.
- 1.1.2.5 Employees should not illegally acquire or use any secret business information of a third party.
- 1.1.2.6 Employees shall maintain the utmost confidentiality with regard to BCEC, its clients, contracts, subcontracts and tendering information. This principle continues to be applied post termination. On termination of their employment with BCEC employees must return all files, telephones, laptops, documents, other papers and property of every description within their possession or control belonging to BCEC.
- 1.1.3 GIFTS, FAVORS AND OTHER BENEFITS**
- 1.1.3.1 BCEC strongly discourages employees and their immediate families from accepting or soliciting gifts, payments, commissions, loans, services, entertainment (apart from normal occasional social business meals/drinks) from representatives of and/or organizations or from any other parties related to their duties and seeking to conduct business with BCEC.
- 1.1.3.2 Employees in general should not solicit gifts nor accept cash from suppliers and recruitment agents who supply or provide or may wish to provide goods or services to BCEC in the normal course of business.

- 1.1.3.3 The acceptance of gifts in kind must be restricted to those that are offered by Companies as part of their normal marketing activities, but only on the condition that there is no possibility of that acceptance being misconstrued and should not exceed the value of QAR 400 per occurrence. Hospitality in the form of lunches, dinners and social events is permitted provided that it falls within the usual and reasonable amounts.
- 1.1.3.4 Token gifts and promotional material, which fall outside this policy may be accepted provided that these do not place the employee under any commercial or moral obligation; No misconstructions, however ill founded, could be put upon the acceptance.
- 1.1.3.5 Where a gift cannot be refused to avoid causing an offense, the item must be declared to the Company.
- 1.1.3.6 In all cases, the employee must notify his Direct Supervisor that a gift or hospitality has been made and/or when deemed necessary, the item(s) shall be passed to the Head of Department to take further action.
- 1.1.3.7 Any person/s accepting a gift contrary to these rules will be liable to disciplinary action, which may result in summary dismissal. If there is any element of doubt about any offer regarding the acceptance of gifts, gratuities or hospitality, guidance should be sought in advance from the Human Resources Manager or Head of Department concerned.
- 1.1.4 ANITI-CORRUPTION – BRIBERY**
- 1.1.4.1 Employees are prohibited from soliciting and/or accepting or offering bribes to gain business or financial advantages.
- 1.1.4.2 Employees should not render public officials or persons in a similar position any economic favor such as money, gift or other favor in return for performance of their duties.
- 1.1.4.3 Employees should not pay any agent, advisor or consultant any commission which they have reason to know will be used for influencing public officials or persons in a similar position in an unlawful manner.
- 1.1.4.4 Employees should not render employees or officers of customers/clients of the Company any economic favor such as money, gift or other favor, the value of which is greater than a generally accepted commercial level at the relevant locale nor should they receive such economic favor from officers of customers/clients of the Company.
- 1.1.4.5 Employees who are subjected to demands of this nature must report it immediately to Management.
- 1.1.5 DONATIONS AND OTHER CONTRIBUTIONS**
- 1.1.5.1 Employees should comply with applicable laws and regulations in the event that they make donations and other contributions to various entities.
- 1.1.6 SOCIAL CONTRIBUTION**
- 1.1.6.1 As good corporate citizens, employees should make every effort to establish relationships of trust with the all stakeholders of the Company with whom they have dealings for the continued improvement of corporate value, while carrying out their duties for the Company and further should try, where possible, to make a positive contribution to the communities in which they perform such duties to work toward building a sustainable society.

1.1.7.2 Employees responsibilities should extend beyond economic contributions, and employees need to be generally active on a consolidated base in different fields, with emphasis on education (cultivation of human resources) and the environment.

### **1.1.7 PROTECTION OF ENVIRONMENT**

1.1.7.1 Employees should comply with all the laws and regulations concerning the protection of the environment and actively engage in educational activities related to environmental protection and the efficient use of resources and energy.

1.1.7.2 Employees should expand the procedures for evaluating the environmental impact of any new business and strike a balance between business activities and environmental protection.

1.1.7.3 Employees shall contribute to the development and spread of environmentally friendly technology or business improvements and always take into consideration issues of safety.

### **1.1.8 COMPLIANCE WITH THE GOVERNMENT LAW AND RESPECT FOR HUMAN RIGHTS**

1.1.8.1 Employees should comply with all applicable laws and regulations of the State of Qatar and should conduct themselves in an ethical and responsible manner in the communities in which they perform their duties for the Company

1.1.8.2 Employees should also avoid any action that may be seen to be undesirable, or bring BCEC or its name into disrepute.

## **1.2 PROPER CONDUCT RELATIVE TO COMPANY OFFICERS/EMPLOYEES**

### **1.2.1 RESPECT / DISRESPECT FOR OFFICERS/CO-EMPLOYEES/HUMAN RIGHTS**

1.2.1.1 All employees shall give proper respect to and follow and comply with the instructions of their superiors and officers of the Company.

1.2.1.2 All employees shall be polite and courteous to their co-employees and shall assist and cooperate with one another in the performance of their duties or in the implementation of the aims, purposes or objectives of the Company.

1.2.1.3 Employees should respect the cultures, customs and history of the country (State of Qatar) to which they are brought into contact to work and while performing their duties for the Company.

1.2.1.4 Employees should respect human rights and should not discriminate between persons based on reasons of race, creed, sex, social status, religion, nationality, age or disability.

1.2.1.5 Every employee is expected to use his prudence in giving explanation/clarification in case co-employee makes a complaint or a point of comment; any problem in dispute relating to disrespectful behavior should be referred to the Company's grievance policy and procedure for attention and appropriate action.

1.2.1.6 No employee has the right to deceptively spread rumors about other employee. The Company does not tolerate any ill-mannered misbehavior or personal attacks to anybody at whatever seniority level. At the same time the Company also does not tolerate any employee gossiping and scandalously chitchatting about others. This is severely disrespectful and very unprofessional.

### **1.3 PROPER CONDUCT RELATIVE TO COMPANY'S PROPERTIES AND RESOURCES**

- 1.3.1 Personal business on Company time is forbidden.
- 1.3.2 Thrift should be observed in the use of stationery and other office supplies of the Company; each employee is expected to be cost-conscious and to be aware of his responsibilities to help the Company cut unnecessary expenditures.
- 1.3.3 Employees are expected to protect the interests of BCEC at all times and should not cause damage to the property or reputation of BCEC.
- 1.3.4 The employee shall maintain the resources under his authority such as raw material, means of production or products and other items and make necessary arrangements to safeguard them.
- 1.3.5 Personal use of Company property is not permitted without specific permission.
- 1.3.6 Employees should not use equipment, machinery and tools provided by the employer outside the place of work, without prior authorization from the Company. Such equipment, machinery and tools will be stored safely by the employees.
- 1.3.7 Where damage is caused by carelessness, negligence, or malicious acts, the employee will be held liable and will meet the costs of the damage made.
- 1.3.8 Employees should return material, equipment, tools, unused material to the Company upon termination or end of the employment contract.

### **1.3.9 COMPANY FUND AND FINANCIAL REPORTING**

- 1.3.9.1 Employees should properly manage the assets and funds of the Company and use them only for appropriate business related purposes. Employees shall not establish or maintain undisclosed or unrecorded assets or funds.
- 1.3.9.2 Employees should make timely and appropriate accounting reports, ensuring the accuracy of the reports, and should not make any false or misleading entries in the Company's books and records.

### **1.4 GENERAL ADMINISTRATIVE PROCEDURES**

- 1.4.1 If an employee finds evidence of violations of these policies, he should inform the HR Department or Employee Review Committee (ERC) or Human Resources Manager or any other of his superiors, following the grievance policy and procedure of the Company (please refer to Chapter 10-Employee Grievances).
- 1.4.2 Employees should cooperate in any investigation of such alleged violation. If, as a result of the investigation, it becomes clear that there was a clear violation of these policies, sanctions and/or proper disciplinary actions will be imposed on the violator or his superiors (applying the principle of command responsibility) in accordance with the regulations of the Company.
- 1.4.3 The Company ensures that no disciplinary action will be taken against an employee for reporting or informing of such violation or cooperating in such investigation and makes every effort to prevent such informant and any employees cooperating in such investigation from suffering any disadvantage at his office.

### **ON ACCEPTANCE OF GIFT**

- 1.4.4 As mentioned in the policy of this Chapter, where a gift cannot be refused, any employee accepting or receiving any gifts from any other parties must be declared to the company and must comply with the following procedures:

#### Employee:

- 1.4.5 Employee who received a gift(s) or an item(s) from other party shall declare immediately or notify and hand over same to his Direct Supervisor and/or Department Head for further actions.

#### Direct Supervisor/Head of the Department

- 1.4.6 Monitors gifts received by his staff (subordinates) from other party.
- 1.4.7 Upon receipt of notification and item(s) from the concerned employee, will record in their internal monitoring list of item(s)/gift(s) received from other party and its estimated value and handed over directly to the Human Resources Manager.

- 1.4.8 To accomplish and fill out the “Declaration Form” (On Acceptance of Gifts). To declare details of items received as well indicate his comments and suggestions.

#### Human Resource Manager (HRM)

- 1.4.9 Receives the item(s) and Declaration Form submitted by the Direct Supervisor and/or Department Head.
- 1.4.10 Reviews the report, as his sole discretion and judgment, he has the right to decide on what should be done with the item(s) received, if it need to be acknowledged/accepted or to be returned.

### **YEAR-END DECLARATION OF ACCEPTANCE AND NON-ACCEPTANCE OF GIFT**

- 1.4.11 The HR Department will send out to all employees towards the year-end (by third week of December) a copy of Declaration Letter for Acceptance and Non-Acceptance of Gift within year. All employees will be asked to disclose and certify any items received by indicating list of gifts/other benefits accepted and/or non-acceptance of any gifts/other benefits and will then be asked to sign (employee’s signature) the said declaration letter to signify in agreement with the declaration, upon completion to return or submit same to HR Department on or before the designated due date.

## **Article 2**

### **2.0 BUSINESS CODE OF CONDUCT (for Business Entertainment, Gifts and Invitations)**

#### **POLICY**

- 2.1 Employees may not offer any pecuniary or other advantage from any Company’s business associates or from any other parties related to their duties and seeking to conduct business with the Company, either directly or by means of an agent or any third party in order to obtain an “Improper Business Advantage”. Even if there is no actual intent to gain an Improper Business Advantage, in situations where there is a possibility that the particular conduct may be misunderstood as attempting to gain such an Improper Business Advantage, Employees should not, even as social courtesies, offer business entertainment of, or gifts or invitations.

**Note:** “Improper Business Advantage” means any benefit advantage gained through action that is against the business and public order and morals or fair and equitable principles.

- 2.2 “Company’s Business Code of Conduct” sets forth the regulations and high ideals of behavior that all employees are expected to observe in the conduct of business, and these policies and procedures are intended to establish a code of conduct based on the high business and employee ideals that the Company seeks to maintain especially relating to business entertainment of, gifts and invitations to clients/customers, public officials, suppliers or from any other parties.
- 2.3 These policies and procedures apply to the all officers and employees (including, but not limited to, secondees, temporary employees, transferred temporary employees, contract workers and dispatched workers).
- 2.4 Approved Business Entertainments and Gifts
- 2.4.1 When offering business entertainment or a gift to a business associate or public official such entertainment or gift must satisfy each of the categories listed below. Also, before carrying out the actual entertainments or gifts, it is necessary to obtain the advance approval as described in Procedure No. 2.15 below of this Chapter, disclosing the substance of such entertainments or gifts (including the amount of money the Company will spend) and the purpose of such entertainment or gift.,
- Such entertainment or gift is within the range of normal business and social courtesies
  - There are no circumstances that could give rise to misunderstandings about the purpose of the entertainment or gift being intended to gain an Improper Business Advantage
  - Such entertainment or gift is not in violation of the laws or regulations of the official's jurisdiction
  - The amount of money for such entertainment or gift is properly accounted for in accordance with applicable accounting rules on the Company’s books of account
- 2.5 Prohibited Items
- 2.5.1 The following types of entertainments and gifts are uniformly prohibited.
- Gifts of money (including bills/notes, checks, every kind of cash voucher, stock certificates and securities)
  - Entertainments at hostess, strip or similar adult entertainment clubs (when travelling abroad)
  - Any entertainment or gift that is not properly accounted for on the Company’s books of account
- 2.6 When senior management staff (Level 2’s only) need to discuss a particular business project or maintain a form of business relationship, he needs to seek authorization in advance for a business entertainment expense from the Executive General Manager or Human Resource Manager based on the approved budget. In such case, completing the Entertainment Request Form with the date, time, type of hospitality, name of hosts(s), and name of guests is to be pre-approved by the Executive General Manager and then submitted to the Finance & Accounts Department.
- 2.7 The scale of expenditures should reflect the importance of the company guests and the relationships. In addition, the identity, company name of guests and justifications are to be listed in the claim form. Where possible justifications should reflect the business gains or expected gains for BCEC from incurring the entertainment expense.
- 2.8 Entertainment of employees is disallowed.



- 2.9 Where staff members share meals when entertaining business associates, the senior staff present should pay the bill and make sure that the name(s) and occasion are listed, for proper liquidation and/or reimbursement from the Company.
- 2.10 Original receipts are required to claim entertainment expenses. The receipts for the entertainment expenses are claimed by attaching them to the Expenditure Form. Where expenses are shared with QIPCO, a duplicate copy of the receipts will suffice with either a copy of the Expense Claim form submitted to QIPCO or a common expense Claim form showing the specific expenses charged to BCEC.
- 2.11 The limit of the gift offers and within the range of up to QR 2,500 per occurrence and total budget should not exceed to QR 50,000 per year. While the limit of the entertainment expenses and within the province of up to QR 2,000 per occurrence will need the prior approval of the Executive General Manager. However, it should not exceed QR 5,000 per month. Entertainment expenses exceeding QR 5,000 require prior approval of the Executive General Manager and the BCEC Director.
- 2.12 Where senior staff wishes to host business associates or business relationships for a limited number of persons in their home, prior approval of the Executive General Manager is required.
- 2.13 Permitted Expenses for Invitations
- 2.13.1 When offering a travel invitation to a business associate (including travel and lodging expenses), such invitation must satisfy each of the categories listed below. Also, before carrying out such actual invitations, it is necessary to obtain the advance approval as described in Procedure No. 2.15 below of this Chapter, disclosing the substance (including the amount of money the Company will spend) and the purpose of such invitation.
- Such invitation has a valid purpose and no circumstances could give rise to misunderstandings about the purpose of such invitation being intended to gain an improper business advantage.
  - The amount of money to be paid by the Company is limited to a reasonable amount and to the actual expenditure.
  - The money to be paid by the Company is not a way to provide a personal benefit to the business associate.
  - Such invitation is not in violation of the laws or regulations of the client official's jurisdiction.
  - The money paid by the Company is properly accounted for in accordance with applicable accounting rules on the Company's books of account.
- 2.14 Prohibited Expenses for Invitations
- 2.14.1 The following types of expenses for invitations are uniformly prohibited.
- Delivery to a Business Associate or other party personally of money (including bills/notes, checks, every kind of cash voucher, and securities).
  - Payment of travel or lodging expenses for a person who is not directly connected to a proper purpose for the invitation, like the spouse of a business associate (provided, however, for persons who personally bear the cost of the trip, there are situations where offering business entertainment or a gift to such person would be allowed within the range of normal social courtesies).
  - Expenses that are not properly accounted for on the Company's (or such Associated Company's) books of account.



## PROCEDURE

### 2.15 Advance Approval

When offering business entertainments, gifts or invitations to a Business Associate or any other party such as Public Official, if, after reading and reviewing these policies and procedures, the requesting employee (officer or senior staff) determine that the situation conforms to these policies, such persons should accomplish the Entertainment Request Form and submit the proposed conduct to the Human Resource Manager for the advance approval.

#### Requesting Employee (Officer/Senior Staff)

2.15.1 Employee will offer or propose business entertainment, gift or invitation with Company's Business Associate(s).

2.15.2 To fill out and complete the Entertainment Request Form (includes request for Gifts and Invitations), indicating therein details of the request (with the date, time, venue, type of hospitality, name of hosts(s), and name of guests, etc.)

2.15.3 Upon completion of request form, to submit same and seek advance approval from the General Manager.

#### Executive General Manager (EGM)

2.15.4 Approves or disapproves the request. If disapproves, gives it back to the requesting employee, the copy of the disapproved request form with EGM's remarks or comments. If approves, the EGM signs on it and gives it back to the requesting employee and forward same to the Finance & Accounts Department for processing of request.

#### Finance Department

2.15.5 To process the request and release the approved budget for the entertainment expenses.

### 2.16 Liquidation or Reimbursement of Expenses

#### Requesting Employee

2.16.1 Collate all the original receipts incurred for this purpose. The requesting employee need to submit the Original Receipts (O.R.) to claim entertainment expenses.

2.16.2 To accomplish the Expenditure Form and/or Expense Claim Form, attaching therein all the original receipts incurred for the entertainment expenses and submit same to the Finance & Accounts Department for settlement. Where expenses are shared with QIPCO, a duplicate copy of the receipts will suffice with either a copy of the Expense Claim form submitted to QIPCO or a common expense Claim form showing the specific expenses charged to BCEC.

### 2.17 Advance Consultation Window

In the event of situations where you are unable to judge solely from these policies and procedures whether certain business entertainment, gifts or invitations for business associates or other parties would be allowed, including the appropriate level of amount thereof, please consult beforehand with the relevant Department Head or Compliance Officer in-charge of your department's business transactions to provide proper guidance and judgment.

## 2.18 Channels for Consultation and Reporting of Violations

If it should happen that an Employee discovers conduct that was in violation of these policies and procedures, such Employee should use the channels in reference with Company's Grievance Policy and Procedure for reporting and consulting regarding the compliance, and/or inform Human Resource Manager of such occurrence.

### Article 3

#### 3.0 **EMPLOYEE AND BUSINESS CODE OF CONDUCT GUIDELINES DECLARATION POLICY**

- 3.1 The Company will ensure that all employees (either newly recruited or old employees) have read and understood the policies and procedures pertaining to Employee and Business Code of Conduct of the Company. Each employee will be required to sign in the Declaration Letter to signify his acknowledgement and declaration that he will abide and comply with the said guidelines during his employment with the Company.
- 3.2 In case of any revision or amendment made in this policy and procedure, all employees shall still be asked and required to sign in the Declaration Letter.
- 3.3 The Declaration Letter shall be issued and distributed by the **HR Department** to employee on his joining date and from time to time, as it may deem necessary and applicable. The signed document letter shall be kept and filed by within the HR Department.

*- End of this Chapter-*





# Social Responsibility Outlines & Main Stakeholders



Interested Parties (Stakeholders)	Needs & Expectations
1. Employees	<ul style="list-style-type: none"> <li>• Respectful treatment of all employees, at all levels of the organization</li> <li>• Professional growth through targeted human capital development initiatives.</li> <li>• Reward of performance</li> <li>• Opportunity to use skills and abilities towards the fulfillment of aspirations</li> <li>• Trustworthy and psychological safe working environment</li> </ul>
2. Clients	<ul style="list-style-type: none"> <li>• Performance</li> <li>• Efficiency</li> <li>• Openness</li> <li>• Partnership</li> <li>• Reliability</li> </ul>
3. Shareholders	<ul style="list-style-type: none"> <li>• Sustainable value creation</li> <li>• Transparent relationship</li> <li>• Enhanced risk management</li> </ul>
5. Financial Institutions (Banks)	<ul style="list-style-type: none"> <li>• Fair operating practices</li> <li>• Compliance with responsible financing principles (Equator Principles initiative)</li> </ul>
6. Supply chain partners	<p>Environment, Health &amp; Safety alignment</p> <ul style="list-style-type: none"> <li>• Quality</li> <li>• Delivery</li> <li>• Innovation</li> <li>• Engagement</li> <li>• Compliance with our policies and procedures</li> <li>• Sustainable relationships</li> </ul>



# STAKEHOLDER AIMED INITIATIVES

## 1.EMPLOYEES

### VALUE DRIVERS

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- Recruitment
- Retainment & Development
- Other Employee Initiatives-Environment

- EBITDA margins increase
- Improved risks management
- EBITDA margins increase
- Improved risks management
- Reputational "Fly Wheel" effect on recruitment
- SG&A reduction
- SG&A reduction

**Objective:** Attracting talented professionals  
Reframing-monitoring our recruitment offering to highlight:

- Employment safety in case of illness
- Employment safety in case of death
- Professional development opportunities (identification of aspirations)
- Career Advancement opportunities
- CSR training
- SDG's training
- Improving labor standards performance
- (Refer to SAI -i.e. Social Accountability International)
- Satisfying employees needs at work
- Black Cat involvement and contribution towards community initiatives
- Life Insurance program
- Enhancement of camp conditions.



# BLACK CAT INTRANET E-LEARNING PLATFORM- “THE PULSE”

The CSR department is delighted to announce the upcoming launch of Black Cat’s exclusive “e-Learning Platform” developed and purpose-built with you in mind. The platform is state-of-the-art with impressive user experience and interface. The launch is planned in phases and will be your go to hub to advance your career, pursue your passion, keep learning and more.

The platform is aimed at giving you a solid up-to-date development, a strong understanding of the CSR principals and commitment that Black Cat is pursuing with a focus on you, bundled with access to a wealth of information links, videos and publications (e-library) related to multiple professional and personal development learnings and trainings - Thus allowing you become the best version of yourself.

The platform will be also used as an interactive tool to conduct the orientation of new employees onboarding, so as to ensure their awareness of Black Cat, the culture and values, the capabilities and services including some of the induction programs relevant to each department and more. To recap, the main intent of the e-Learning platform, is to provide all employees with the opportunity to further their knowledge in all areas of our business and beyond which will be deployed in planned phases.

The e-learning platform is part of CSR action plan, aligned with the vision 2030 of the UN for which Qatar is part of. In order to provide our contribution, Black Cat is linking itself to the SDG’s (the Sustainable development Goals, which are part of the UN 2030 AGENDA and of which the ISO 26000 is an advocate); to achieve this alignment will require the collaboration of all our departments to ensure the affiliation and the resulting accreditation of our organization comes to fruition. An “SDG blueprint for a better future” course will be available via the e-Learning platform and is highly recommended that all employees complete the course.

We are finalizing the courses in the e-learning platform which will offer a wide range of courses for you to select, complete, and get a Black Cat accredited certificate.

We value your feedback and request every employee, in coordination with their direct supervisors and managers, to provide CSR office with your preferences on the type of course categories or subjects that you feel can enhance your professional knowledge. Only when we receive feedbacks, can we add relevant course categories or subjects into the pipeline for your learning and development.

Point to note, at the end of each course (where applicable), Black cat will issue a certificate of completion that is of a great relevance to your professional advancement, a subject that is very dear to us” With your active participation and completion of courses, we look forward to being motivated and consider further enhancement, development and investment to give you an access to a higher degree of education, in association with renowned entities such as Universities and International Schools for online courses and certifications.

In closure, continuous learning and anticipation are the elements of our culture through which by “keeping abreast, we keep ahead”. As the old saying goes, “Luck favor's the prepared”. That’s why we are actively working to foster your development and well-being in conjunction with CSR initiatives design.



# BLACK CAT INTRANET E-LEARNING PLATFORM- "THE PULSE"

The screenshot displays the Black Cat Intranet E-Learning Platform interface. At the top left is the Black Cat logo with '40' and 'EST. 1961'. The user profile 'Jerry Francis' is shown at the top right. A navigation sidebar on the left includes: Pulse, Announcements, Events, Essentials Hub, e-Library, Media Zone, e-Learning Xperience (highlighted), Forums, Offers & More, and Departments.

The main content area features a grid of course cards for various Sustainable Development Goals (SDGs). Each card includes a progress bar, completion status, last activity date, a 'COMPLETE' badge, a course image, the goal number and name, the instructor's name (Boussaina Kalo Borchetta), and a 'START COURSE' button.

Goal	Completion	Last Activity	Course Title
Goal 11	0% Complete (0/6 Steps)	None	SUSTAINABLE CITIES AND COMMUNITIES
Goal 12	80% Complete	April 20, 2021	RESPONSIBLE CONSUMPTION AND PRODUCTION
Goal 13	100% Complete	April 18, 2021	CLIMATE ACTION
Goal 14	100% Complete	April 20, 2021	LIFE BELOW WATER
Goal 15	None	None	LIFE ON LAND
Goal 16	None	None	PEACE, JUSTICE AND STRONG INSTITUTIONS
Goal 17	None	None	PARTNERSHIPS FOR THE GOALS
Goal 2	None	None	ZERO HUNGER

## 2. COMMUNITY

### VALUES

- Organization of environmental drive initiatives

• Internship Programs with Vocational School & Universities

• Students orientation at location for an engineering , project management, supply chain careers

• Cooperation's with universities & Local Societies on projects related to our sector improvement of productivity, processes & technologies

- Investment into "CIRCULAR ECONOMY" projects.(In cooperation with our Inhouse chemical and mechanical engineers &Industrial design team

Reputational "Fly Wheel effect

Reputational "Fly Wheel Effect(employment contribution)

Reputational "Fly Wheel Effect (employment contribution)

Revenues Growth & Sustainability

- Environmental drive: "Encourage the development and diffusion of environmentally friendly technologies.
- Paper minimization initiatives.
- Internships programs with vocational schools & Initiatives.
- Students orientation for an engineering, project management, supply chain careers.
- Cooperation with universities & local societies on development related to our sectors.
- improvement of productivity processes & technology.
- Integrate persons with special needs (Part of Qatar "Global declaration")
- Heritage preservation and to be a sponsor of the art and culture programs.

"UNGC PRINCIPLE 9: ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES."



## INITIATIVES AGAINST COVID-19

In light of the rapidly evolving pandemic COVID-19, Black Cat Engineering & Construction pledged QR 50,000 to Qatar Charity during the month of Ramadan 2020. Ms. **Boussaina Kalo Borchetta**, Senior **Corporate Social Responsibility** Officer said: “The pandemic is impacting communities worldwide, and it’s never been more urgent to support those in need at this critical juncture; in pursuing its commitment towards social responsibility, and the adoption to the 17 UN’s SDG’s, Black Cat is delighted to join forces with Qatar Charity, to alleviate the impact of COVID-19 on the more vulnerable members of our society.” From May 19th to May 23rd, 2020, Black Cat has launched the “Make a wish. Be a star. Inspire us – We will get through this together” initiative, wherein, every individual has been able to make a wish via Black Cat’s website, and for every wish posted, Black Cat has contributed an amount to Qatar Charity. Black Cat thanks all the 465 individuals in Qatar and beyond who took the time and made wishes.

<https://youtu.be/O5ZAqLBiWcl?t=1>

<https://youtu.be/DBXIQ2ZOCsw>



# BLACK CAT INTRANET E-LEARNING PLATFORM- "THE PULSE"

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The screenshot displays the Black Cat Intranet E-learning Platform interface. At the top, the logo "BLACK CAT 10" is visible, along with the user name "Jerry Francis" and navigation icons for search, mail, and notifications. A left-hand navigation menu includes links for Pulse, Announcements, Events, Essentials Hub, e-Library, Media Zone, e-Learning Xperience, Forums, and Offers & More. At the bottom, there are links for Departments and Employee Directory.

## Farewell – Black Cat Internship Program for graduates

September 5, 2021 7:00 am Category: Announcements, News

Black Cat is glad to announce the closure term of the first batch of the College of North Atlantic's Qatar Students that took part in a four-month internship program in the company premises and project sites.

We would like to thank our CSR Department on such an initiative, Which is in line with the "Qatar National Vision 2030", by shouldering the future young talented Engineers of Qatar and giving them the opportunity to broaden their knowledge and enhancing their learning skills, With the help of our Head of departments, project managers and being part of the active working experience.

The Quality Education goal no 4 falls in line within the CSR Prerogatives that contributes to one of the many sustainable development goals (The UNGC 2030 Agenda, The 17 Sustainable Development Goals) by serving the community needs and delivering rigorously on its social governance.

02 Sep 2021

On the right side of the article, there are three widget boxes: "Search" with an input field, "CATEGORIES" with a "Select Category" dropdown, and "RECENT POSTS" listing three articles: "Farewell - Black Cat Internship Program for graduates" (September 5, 2021), "Girish completes UNDP's certification for Nature-based solutions for sustainable development" (August 8, 2021), and "Black Cat Internship program for graduates" (June 24, 2021). Below these is an "ARCHIVES" widget with a "Select Month" dropdown.



### 3.SUPPLY CHAIN DUE DELIGENCE & SUSTAINABLE PROCUREMENT PRACTICES

#### VALUES

- Establish-Implement Compliance requirements in line with intl. standards(Labor practices)

Defend EBITDA margin

Risk reduction and management through improved execution reliability

In-Country Value

ICV Scorecard Certificate Refresh

This Certificate is issued to:

### BLACK CAT ENGINEERING AND CONSTRUCTION W.L.L

Commercial Registration Number: 10756 | Address: P.O.BOX 12714

#### ICV Certification Details

Certificate Number	Certifier	Financial Year
DE-SCR-00010756-2019-1	Deloitte and Touche - Qatar Branch	30 December 2019
Issue Date	Expiry Date	Download Date
05 October 2020	31 December 2021	06 September 2021

#### ICV Score & Contribution

Valid

ICV Score	A. Goods & Services	26.59%
28.87%	B. Workforce Training	0.00%
Refresh	C. Supplier Development	0.00%
	D. Investments in Fixed Assets	2.28%

This certificate is a refreshed version of the initial certificate issued on 05 October 2020. The refresh was conducted by Tawteen through the ICV Digital Portal. This refreshed certificate must be attached and read in conjunction with initial issued certificate signed by the Certifier and Supplier.

Refresh Date  
31 Aug 2021

Refresh

Notes

- 1) This ICV Certificate is an extraction from Deloitte and Touche - Qatar Branch's full ICV report dated 05/10/2020 and should be read in conjunction with the cover letter and factual findings report relevant to the ICV score in the full ICV report.
- 2) This full ICV report is issued vide an engagement letter between Deloitte and Touche - Qatar Branch and BLACK CAT ENGINEERING AND CONSTRUCTION W.L.L dated [Date of Engagement]. Deloitte and Touche - Qatar Branch does not accept or assume any liability, responsibility or duty of care for any use of or reliance on this document by anyone, other than the intended recipient to the extent agreed in the engagement letter.
- 3) In the case any information included in the ICV Certificate requires further validation, contact should be made with Tawteen.

Tawteen ICV program is developed to complement Qatar National Vision 2030 by driving the localization agenda in Qatar's Energy sector through the following key enablers

a. Way of working, not just a formula

- ICV will change the behavior of procurement process and suppliers spend. Suppliers need to adapt their procurement strategy as the commercial evaluation will be based on suppliers' competitive price and ICV score.

b. Contribute to sustainable economic growth for the Energy sector

- ICV will encourage local businesses to grow and broaden local sources to enhance the supply chain resilience and business continuity.
- ICV will reduce dependency on imports since resources will be available in country, which will result in logistic cost savings and shorter lead-time.

c. Key strategic focus area

ICV in Qatar is driven by focusing on the following strategic objectives of localization:

- Maximize sustainable in-country value creation
- Upskill and develop local talent and suppliers
- Promote in-country private investment



**d. Mechanism to promote GDP diversification**

ICV promotes GDP diversification through developing and supporting local suppliers and SME (small and medium enterprises) as well as incentivizing foreign suppliers to establish new opportunities in Qatar

**e. Enable the development of local suppliers**

Suppliers will benefit from their contribution to develop and support their sub-suppliers. Any cost incurred by the suppliers towards the development of their sub-suppliers counts as 100% contribution to ICV.

**f. Support Qatar in becoming globally competitive**

ICV incentivizes exports since the revenue from export is excluded from ICV formula, which leads to a higher ICV Score.



# ORGANISATIONAL PRACTICES

ERP Implementation has its benefits across different functions that contributes to a better cooperation and implementation of CSR objectives versus supply chain management, manufacturing, finance, human capital management and the Enterprise performance management.

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## An Overview of ERP on Cloud Platform



## Supply Chain Management

- ✓ Integrated operations between Supply Chain and Finance functions
- ✓ A wide variety of dashboards to monitor status on procurement, material receipts, payments to suppliers etc.
- ✓ Streamlined online procedure for ensuring cost effective, timely and quality supplies
- ✓ Enabling of Key Suppliers with Black Cat's Applications ecosystem for easier co-ordination between Suppliers and Black cat

## Manufacturing

- ✓ More streamlined and integrated Planning & Manufacturing Operations
- ✓ Optimized execution as per Resources availability
- ✓ Committed deliveries to customers
- ✓ Organized inspection for deriving better quality of the end products
- ✓ Optimum preventive maintenance to ensure continuous operations with minimal downtime



# Human Capital Management

- ✓ Online publication of job opportunities and recruitment process
- ✓ Better organization of a variety of learning needs of employees across the enterprise
- ✓ Online and transparent Performance Evaluation and Rewards Mechanism across the enterprise
- ✓ Easier Creation/Alteration/ Maintenance of Employee information across the enterprise
- ✓ Online application of Leave & Approvals at anytime from anywhere
- ✓ Integrated Attendance Capture and Payroll processing
- ✓ Variety of Dashboards to monitor Employee Information. Leave Status, Performance Appraisal etc

## Operations Management (Primavera /Unifier/ cloud platform)

- ✓ Workflow enabled Approvals for Tendering, Project Creation, Documents Approvals etc.
- ✓ Integrated solution of Primavera, Unifier and Oracle Projects will give business the visibility of Project Budget, Project Cost, Schedule etc.
- ✓ EVM gives a complete picture of Project status in terms of both schedule and cost
- ✓ Using Cost Breakdown Structure (CBS), Indirect cost can be managed across departments correctly
- ✓ Establish Budgetary Control in ERP to check, analyze budget at the time of indentation.
- ✓ Availability of Project Profitability, Performance. through a variety of Dashboards
- ✓ Alerts available for approvals related Pending Tasks / actions that exceed pre-defined thresholds.



## Finance

- ✓ Integrated operations between Finance and Supply Chain, Projects, Payroll Functions.
- ✓ Easy processing of Invoices with PO Matched, Project related, and Asset related.
- ✓ Automatic Reconciliation Process between Black Cat and their Banks
- ✓ Automatic Accounting process for the various transactions
- ✓ Workflow based Approval process for Invoices and Journals.
- ✓ Inbuilt controls of sub ledger vs Ledger reconciliation process.
- ✓ Easy to perform period closure activity in sub ledgers and General Ledger.
- ✓ Seeded integration with Project billing process.
- ✓ Automatic Depreciation Calculation and Automatic Asset Accounting.
- ✓ Security and Access Controls at Account Code Level.
- ✓ Performs Budgetary Controls at a variety of code Combinations in the Chart of Accounts

## Enterprise Performance Management

- ✓ Near perfect forecasting with less amount of effort.
- ✓ Prediction of Growth with more precision.
- ✓ Mobilizing of work force, Capital assets with ease and its real time impact on company's results
- ✓ Different Dashboards to view Revenue & Cost projection
- ✓ From budgeting to financial results generation, is now a seamless process



## 4. Government & NGO's

## VALUES



- Societal contribution
- Increase employable skills
- Professional development
- Better Networking/Affiliation towards the implementation of SDGs / Partnership for the goals (Goal NO 17)



### 5.CLIENTS

Establish-Implement Compliance requirements in line with international standards(Labor practices).

### VALUES

Reputational “Fly Wheel” effect

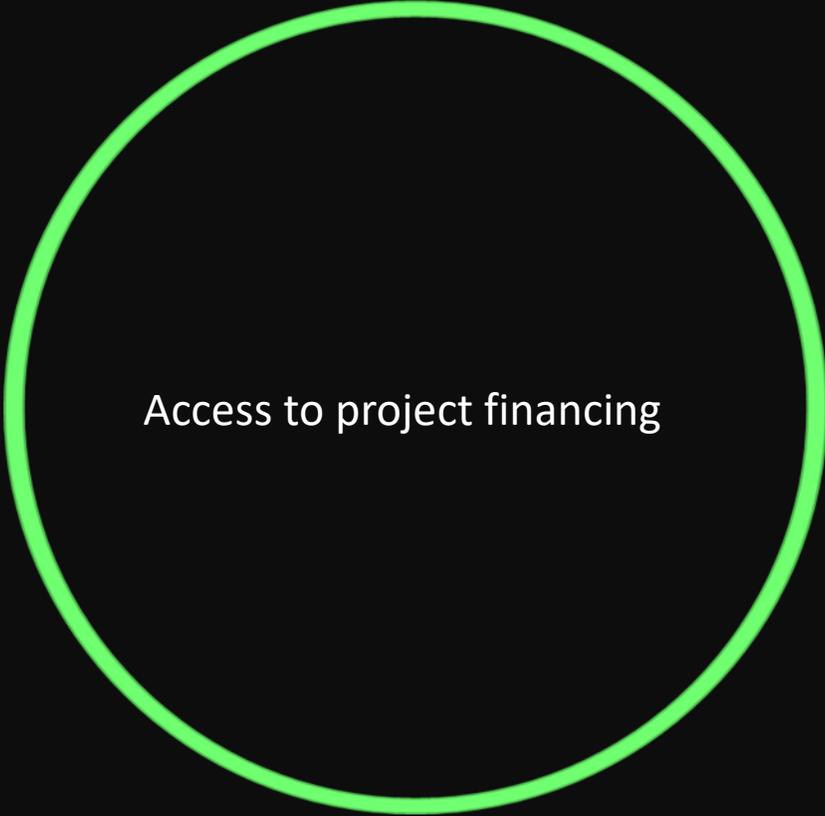
Market Share consolidation



## 6. FINANCIAL INSTITUTIONS AND BANKS

### VALUES

- Black Cat monitors and evaluates financial performance through External Financial Audits conducted by Deloitte.



Access to project financing





# United Nations Global Compact

We thank you for your time spent taking this survey.  
Your response has been recorded.

Below is a summary of your  
responses

[Download PDF](#)

Thank you for completing the 2021 UN Global Compact Implementation Survey, as part of your commitment to the Global Compact. Your response to the survey is especially important as we seek to assess progress made by our participants over time and the initiative's impact.

This annual benchmark survey is not an evaluation of any single company's performance. Rather, it allows the Global Compact to broadly understand the ways in which our business participants are working to implement the ten principles as well as the Sustainable Development Goals. Through your honest responses, we are able to assess where and how progress is being made, as well as identify areas that are challenging for companies. This survey provides the Global Compact with information that is critical to the prioritization and development of future resources, dialogues and learning events for participants.

The survey must be completed by 7 May 2021:

- A copy of the survey can be downloaded to facilitate its online completion: [English](#) - [Français](#) - [Español](#) - [中文](#) - [日本人](#) - [한국어](#) - [Deutsch](#) - [Português](#) - [Türk](#)
- All answers provided will be treated in strict confidence and will only be reproduced in aggregated and anonymous form.
- If you need to leave the survey before it has been submitted, simply close your browser. Your answers will be saved. You can return to and change your answers at any time until you submit the survey.
- To begin the survey, please click on the ">>" button below.

Note on terminology: The terms corporate responsibility and corporate sustainability are used interchangeably in this survey – and are defined as a company's delivery of long-term value in financial, social, environmental and ethical terms – covering all ten principles of the Global Compact.

Compact.

If you have any questions or encounter challenges in completing the survey, please contact [survey@unglobalcompact.org](mailto:survey@unglobalcompact.org). We will respond promptly.

Thank you for your time and important contribution.

The UN Global Compact Office

## Section I: Management & Governance

This is not an evaluation of your company's policies and performance. The survey is strictly used for information gathering and it is important to answer accurately. All information provided will be treated in strict confidence and is anonymous.

Note on terminology: The terms corporate responsibility and corporate sustainability are used interchangeably in this survey - and are defined as a company's delivery of long-term value in financial, social, environmental and ethical terms - covering all Ten Principles of the UN Global Compact.

At what levels within your company are corporate responsibility policies and strategies developed and/or evaluated? Select all that apply:

- CEO
- Board of Directors\*
- Corporate Responsibility or Ethics officer**
- Senior management
- Middle management
- Other (please specify)

Note: \*For companies without a formal Board, other governance or ownership body assumes these responsibilities

How often does your company's Board of Directors (or equivalent\*) address corporate responsibility issues? Select only one choice:

Note: \*For companies without a formal Board, other governance or ownership body assumes these responsibilities

- Board discusses and acts on these issues as part of regular agenda
- Board addresses these issues from time to time, as needed**

- needed**
- Board does not address corporate responsibility issues
  - Other (please specify)
  - Unsure

**How does your company's Board of Directors (or equivalent\*) address corporate responsibility issues? Select all that apply:**

*Note: \*\*For companies without a formal Board, other governance or ownership body assumes these responsibilities*

- Appoints sub-committee or individual member responsible for corporate responsibility**
- Approves reporting on corporate responsibility (e.g., Sustainability report, Communication on Progress)
- Establishes or approves targets for the company's sustainability performance
- Links executive remuneration packages to corporate sustainability performance
- Provides corporate responsibility training for Board members
- Other (please specify)
- Unsure
- None

**What actions has your company taken to embed corporate responsibility throughout its strategies and operations? Select all that apply:**

- Publicly communicate its commitment to corporate responsibility**
- Set measurable sustainability goals**
- Conduct corporate responsibility risk assessment**
- Conduct corporate responsibility impact assessment**
- Establish/adjust policies to incorporate visions and goals**
- Monitor and evaluate sustainability performance**

- Public disclosure of sustainability policies and practices**
  - Engage in multi-stakeholder consultations**
  - Join voluntary initiatives (e.g. sector, issue specific) in addition to the UN Global Compact**
  - Integrate into relevant corporate functions**
  - Communicate commitment to an internal audience**
  - Integrate into business unit strategies and operations**
  - Values reflected in code of conduct**
  - Changed business model to more deeply embed sustainability**
  - Managed transition away from negative impact products and services
  - Use pricing of negative impacts, (e.g. carbon pricing) in decision making
  - Incentivizing and disincentivizing corporate responsibility
  - Other (please specify)
- 
- None
  - Unsure

**Which of the following statements regarding the COVID-19 pandemic is most relevant to your company?**

- COVID-19 has increased the importance of corporate responsibility to our company.**
- COVID-19 has had no impact on how our company perceives the relevance of corporate responsibility.
- COVID-19 has decreased the importance of corporate responsibility to our company.

**In the context of COVID-19 which of the following have gained greater importance for your company in the past year? Please select 5 responses and then rank your responses in order of importance from 1 – 5, with 1 being the most important reason.**

Safety

Ensuring Stable Job  
Growth

Poverty

Access to  
Education

Youth  
employment

4 Human  
rights

Gender Equality

Domestic violence

Racial Equality

Persons with  
Disabilities

2 Provision of social safety  
nets

Climate Change

Water &  
sanitation

Food & agriculture

Biodiversity

Corruption

Infrastructure

3 Disaster preparation and  
recovery

Political Stability

Rule of  
Law

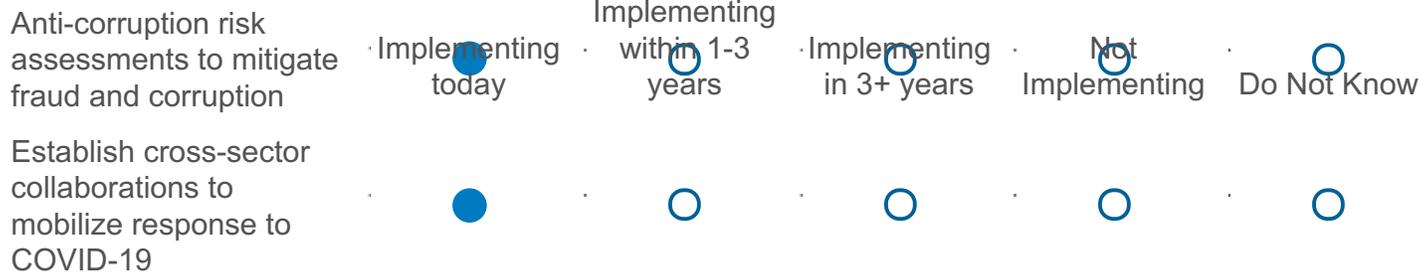
Multi-stakeholder partnerships (with Governments, UN etc.)

Other (please specify)

---

**What actions is your company implementing today or planning to implement in the future as a response to COVID19? Select those that apply**

	Implementing today	Implementing within 1-3 years	Implementing in 3+ years	Not Implementing	Do Not Know
Flexible working arrangements e.g. remote work	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Paid sick and/or emergency leave policies e.g. caretakers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to family support services e.g. childcare, home schooling	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protection schemes for workers e.g. low wage, underrepresented groups	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementing a green recovery plan e.g. renewable supplier, fossil fuel divestment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Human and labour rights risk assessments across the supply chain	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Flexible policies on delivery and quotes for suppliers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wider insurance benefits e.g. at-risk workers, access to credit lines	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop new products or services e.g. medical and sanitary products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strict measures for health and safety e.g. sanitation, hygiene products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**What are the top 5 reasons for your company's participation in the UN Global Compact? Please select 5 responses and then rank your responses in order of importance from 1 – 5, with 1 being the most important reason.**

- Increase trust in company through public commitment to sustainability
- Address humanitarian concerns
- Global Compact is a global initiative with local presence
- Acquire knowledge to advance sustainability into operations and strategy
- Establish links with UN
- Networking with other organizations
- Universal nature of the principles
- Address business opportunities and risks
- Comprehensive framework that includes the range of sustainability issues
- Promotes action on sustainability within the company
- Attract, motivate and retain employees
- Pressure from external stakeholders
- Investor efforts to evaluate corporate sustainability performance

Other (please

specify)

Unsure

**What actions does your company take to advance diversity and inclusion (D&I) practices throughout its strategies and operations? Select all that apply**

- Publicly announced diversity and inclusion organizational targets
- Inclusion and diversity metrics are monitored to identify patterns of exclusion**
- Safe employee resource groups to share grievances with management**
- Unconscious bias training at all levels e.g. racial bias training**
- Inclusive policies that promote diverse teams**
- Expanded D&I programs that promote hiring diverse talent
- Leaderships accountability to diversity and inclusion targets**
- Mentorship and support networks for underrepresented groups entering the workforce**
- Diversity and inclusion targets firmly embedded in recruitment strategy**
- Executive remuneration linked to diversity and inclusion targets
- Chief D&I officer reports segregated metrics directly to CEO e.g. ethnic and/or racial relations**
- Suppliers are required to complete D&I training during onboarding**
- Annual review and enhancement of investments made for D&I**
- Other (please specify)

Unsure

**Currently what time frame do you have in place for your company's corporate sustainability targets?**

Up to 2 years

- 2-5 years**
- 5-10 years
- 10-15 years
- 15+ years
- My company currently does not have corporate sustainability targets

**To what extent do you consider adherence to the UN Global Compact principles by supply chain partners?**

On a scale of 1 to 5: 1=Not considered, 5=Required (select only one choice):

*Note: "Adherence" does not require the supplier to be a participant of the UN Global Compact.*

- 1 (Not considered)
- 2
- 3
- 4
- 5 (Required)**

**What actions does your company take to advance supplier adherence to the UN Global Compact principles? Select all that apply:**

- Include corporate responsibility expectations in relevant documents (e.g. contracts, purchase orders)**
- Conduct corporate responsibility due diligence on potential suppliers**
- Train relevant staff (e.g. legal, product developers) on supply chain sustainability**
- Incorporate responsible purchasing practices into procurement staff training**
- Reward suppliers that perform well on business and corporate responsibility criteria**
- Assist suppliers with setting and reviewing goals**
- Review and comment on supplier remediation plans**
- Provide training for suppliers on relevant issues

- Provide resources to suppliers for specific improvement projects**
- Facilitate supplier engagement with stakeholders (e.g., civil society, Government)**
- Collaborate with other organizations to align supply chain sustainability standards**

Other (please specify)

- None
- Unsure

**How does your company assess adherence to the UN Global Compact principles by supply chain partners? Select all that apply:**

Audits by company staff

Audits by third party

**Self-assessment questionnaire**

**Regular business review**

**Review publicly available sustainability reports, certifications or website**

Review documentation provided by supply chain partner that is not publicly available

Verification of remediation activities

Other (please specify)

Unsure

**For which entities in the supply chain do you conduct corporate responsibility due diligence?**

**Select all that apply:**

First tier suppliers

Second tier suppliers

**All tiers**

Largest suppliers based on size of contract

Suppliers identified based on a risk

Suppliers identified based on a risk assessment

Other (please specify)

Do you have a public policy strategy in relation to your corporate responsibility commitments?

Yes

No

Unsure

What are the characteristics of this public policy engagement? Select all that apply:

Publicly advocate for action in relation to the UN Global Compact Ten Principles and Global Goals

Company leaders participate in conferences and other public policy interactions relating to the Global Compact principles and/or other UN goals

Align traditional government affairs activities (i.e. lobbying) with corporate responsibility commitments

Regional or local public policy activities

Other (please specify)

Unsure

## Section II

### Implementing the Ten Principles

This is not an evaluation of your company's policies and performance. The survey is strictly used for information gathering and it is important to answer accurately. All information provided will be treated in strict confidence and is anonymous.

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### Section IIa: Human Rights

**Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and**

**Principle 2: make sure that they are not complicit in human rights abuses.**

Do you have policies or practices in place related to Human Rights?

Yes

No

How does your company take the human rights principles into account in its policies or practices?

Select all that apply:

- Set of corporate principles on human rights specifically**
- Within an overall corporate code or principles**
- Implementing a public human rights policy
- Human rights risk assessment**
- Human rights impact assessment**
- Operational guidance notes**
- Complaint and/or grievance mechanism**
- Remediation processes**
- Training and awareness programmes for employees**
- Supply chain and subcontracting arrangements**
- Human rights risk assessment for suppliers and subcontractors**
- Employee performance assessment**
- Monitor and evaluate performance**
- Public disclosure of human rights policies and practices
- Participate in industry or issue-specific initiatives
- Multi-stakeholder dialogue**
- Other (please specify)
- Unsure

Which aspects of human rights are addressed in your company's policies or practices? Select all

that apply:

- Life, liberty and security of the person**
- Forced labour**
- Child labour**
- Right to privacy**
- Non-discrimination**
- Gender equality**
- Workplace health and safety**
- Adequate standard of living**
- Health**
- Freedom of association and other rights at work
- Forced displacement
- Other (please specify)
- Unsure

Is your company committed to implementing the UN Guiding Principles on Business and Human Rights?

- Yes**
- No
- Not sure

Has your company signed the CEO Statement of Support for the Women's Empowerment Principles?

- Yes
- No
- No, but my company has made another public commitment to gender equality.**
- Not sure

**Is gender equality embedded into your company's corporate sustainability strategy?**

- Yes**
- No
- Not sure

**Where does the responsibility for gender equality sit within your organization?**

- Board of Directors
- Chief Executive
- Sustainability/Corporate Responsibility**
- Human Resources
- Sales & Marketing
- Environment, Health & Safety
- Operations
- Public Affairs/Communications
- Legal/Compliance
- Finance/Accounting
- Business Development
- Logistics/Supply Chain
- Consultant
- Other
- Not sure

**What is the gender composition of the Board of Directors (or equivalent\*) of your company?**

Male	<input type="text" value="100%"/>
Female	<input type="text" value="0"/>

*Note: \*For companies without a formal Board, other governance or ownership body assumes these responsibilities*

**What is the gender composition of the executive/highest level management team in your**

company?

Male

90%

Female

10%

What is the gender identification of your Chief Executive Officer or equivalent?

- Male**
- Female
- Non-conforming

Do you have a public target for women's representation at any of the following levels within your organization?

- Board of Directors;
- C-Suite/Executive Management;**
- Middle-Management.

What is your target for women's representation at the C-Suite/Executive Management

- 0-15%**
- 16-30%
- 31-50%
- Over 50%

When do you aim to achieve your women's representation goal at the C-Suite/Executive Management

- 2021-2025**
- 2026-2030
- Beyond 2030/target is not time-bound

In what ways is your company taking action to advance Gender equality?

- Leaders are committed to and held accountable for gender representation goals (Targets cascaded, transparency of data, women on board, leadership, across business divisions etc.)
- Pay equity (base pay and bonuses, rigor in analyzing pay decisions and taking action where there are gaps)**

- External partnerships (industry initiatives, policy advocacy)
- HR processes and policies which focus on retaining and promoting women (Recruitment, employee networks, mentoring programs, upskilling opportunities, sponsorship, leadership development)**
- Policies supporting working parents (parental leave, childcare, post-parental leave support)**
- Flexible working options to support work/life balance (flexible working, virtual working, part-time working)**
- Sexual harassment policy (strict, prompt and decisive action against harassment, respectful culture etc.)**
- Diversity and inclusion training (unconscious bias, holistic gender programs etc.)**
- Policies in place to respect and support women's health.**
- Use sex-disaggregated data in company reports
- Inclusive sourcing and support for women entrepreneurs
- Gender-sensitive products and offerings relevant to our sector
- Other
- Not sure

To what extent has the UN Global Compact had impact on how your company addresses human rights? Select only one choice.

- 1: None
- 2: Minimal
- 3: Moderate
- 4: Significant**
- 5: Essential

Which of the following UN Global Compact offerings had impact on how your company addresses human rights? Select all that apply:

- Universal value of the ten principles**
- Tools and resources

- In-person event**
- Online event**
- Support from Local Network**
- Action Platform participation**
- Special Initiatives (e.g. Target Gender Equality, SDG Ambition)**
- Completing the annual Communication on Progress**
- Public policy dialogue
- Other (please explain)

**What challenges does your company face in advancing Human Rights? Select all that apply:**

- Lack of financial resources
- Lack of support from top management
- Competing strategic priorities
- Lack of knowledge
- No clear link to business value
- Lack of recognition from investors
- Implementing strategy across business functions
- Extending strategy throughout the supply chain**
- Extending strategy throughout subsidiaries
- Difficulty due to operating environment (e.g., conflict area, poor state governance)
- Global disruption due to unanticipated circumstances**
- Other (please specify)

- Nothing
- Not

## Section IIb: Labour

This is not an evaluation of your company's policies and performance. The survey is strictly used for information gathering and it is important to answer accurately. All information provided will be treated in strict confidence and is anonymous.

***Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;***

***Principle 4: the elimination of all forms of forced and compulsory labour;***

***Principle 5: the effective abolition of child labour; and***

***Principle 6: the elimination of discrimination in respect of employment and occupation.***

Do you have policies or practices in place related to Labour rights?

Yes

No

How does your company take the Labour principles into account in its policies or practices?

Select all that apply:

Recognize that all workers are free to form and join a trade union of their choice

**Policy not to use or benefit from forced labour**

**Policy not to use or benefit from child labour**

**Non-discrimination policy**

**Equal opportunity policy**

**Policy to ensure safe working conditions**

Other (please specify)

Unsure

What actions does your company take to implement the Labour principles? Select all that apply:

Participate in institutional framework for industrial relations and collective

- Participate in institutional framework for industrial relations and collective bargaining
- Working conditions and terms of employment are addressed through collective bargaining
- Labour rights risk assessment**
- Labour rights impact assessment**
- Take steps to avoid exclusion of union members from employment
- Reliable mechanisms for age verification**
- Offer a living wage to our employees**
- Ensure a living wage is provided to workers in our supply chain**
- Take steps toward achieving zero fatal work-related accidents, severe injuries, and diseases.**
- Take steps toward enabling worker empowerment**
- Support vocational training and counseling programmes**
- Work-life balance measures**
- Inclusion of people with disabilities**
- Training and awareness programmes for employees**
- Supply chain and subcontracting arrangements**
- Monitor and evaluate performance**
- Public disclosure of labour policies and practices**
- Participate in industry or issue-specific initiatives**
- Multi-stakeholder dialogue**
- Other (please specify)
- Unsure

To what extent has the UN Global Compact had impact on how your company addresses Labour rights? Select only one choice.

1:

None

- 2: Minimal
- 3: Moderate
- 4: Significant**
- 5: Essential

Which of the following UN Global Compact offerings had impact on how your company addresses Labour rights? Select all that apply:

- Universal value of the ten principles**
- Tools and resources
- In-person event**
- Online event**
- Support from Local Network**
- Action Platform participation**
- Special Initiatives (e.g. Target Gender Equality, SDG Ambition)**
- Completing the annual Communication on Progress**
- Public policy dialogue**
- Other (please explain)

What challenges does your company face in advancing Labour Rights? Select all that apply:

- Lack of financial resources
- Lack of support from top management
- Competing strategic priorities
- Lack of knowledge
- No clear link to business value
- Lack of recognition from investors
-

Implementing strategy across business functions

**Extending strategy throughout the supply chain**

Extending strategy throughout subsidiaries

Difficulty due to operating environment (e.g., conflict area, poor state governance)

**Global disruption due to unanticipated circumstances**

Other (please specify)

Nothing

Not sure

## Section IIc: Environment

This is not an evaluation of your company's policies and performance. The survey is strictly used for information gathering and it is important to answer accurately. All information provided will be treated in strict confidence and is anonymous.

*Principle 7: Businesses are asked to support a precautionary approach to environmental challenges;*

*Principle 8: undertake initiatives to promote greater environmental responsibility; and*

*Principle 9: encourage the development and diffusion of environmentally friendly technologies.*

Do you have policies or practices in place related to Environment?

**Yes**

No

How does your company take the environmental principles into account in its policies or practices? Select all that apply:

Voluntary charters or codes

**Performance targets and indicators**

Cleaner and safer production objectives

**Sustainable consumption and responsible use objectives**

Other (please

specify)

Unsure

What actions does your company take to implement the environmental principles? Select all that apply:

- Environmental management systems**
- Life-cycle assessment and costing**
- Water footprinting
- Environmental risk assessment**
- Environmental impact assessment**
- Eco-design**
- Resource efficiency**
- Use environmentally-friendly technologies and solutions**
- Account for externalities for materially affect investment decisions
- Emissions trading
- Training and awareness programmes for employees**
- Supply chain and subcontracting arrangements**
- Monitor and evaluate performance**
- Report greenhouse gas emissions and strategic climate change data
- Public disclosure of environmental policies and practices
- Participate in industry or issue-specific initiatives
- Multi-stakeholder dialogue**
- Make public commitments to ambitious environmental actions**
- Advocating for more ambitious policies**
- Assess company impact and take ambitious actions for a healthy and productive ocean**
- Other (please specify)

Unsure

To what extent does your company address each of the following environmental issues?

	1 = Not addressed	2	3	4	5 = Fully integrated into company strategy and operations
Climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Water management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biodiversity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Renewable energy sources	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ocean	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Soil health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

#### SELECT QUESTIONS PROVIDED BY THE CDP

Select the option that best describes how your organization's processes for identifying, assessing, and managing climate-related issues are integrated into your overall risk management.

- Integrated into multi-disciplinary company-wide risk identification, assessment, and management processes**
- A specific climate change risk identification, assessment, and management process
- There are no documented processes for identifying, assessing, and managing climate-related issues
- Not sure

Are climate-related issues integrated into your business strategy?

- Yes**
- No
- Not Sure

Does your company have an emissions reduction commitment?

- Yes**
- No
- Not Sure

Not Sure

**Did you have an emissions target that was active in the reporting year?**

- Absolute target
- Intensity target
- Both absolute and intensity targets
- No target
- Not Sure**

**Which of the following drives action on climate change in your company?**

- Mission (climate action prioritised in company strategy, core values etc.)
- Public Targets (emission reduction targets, commitments etc.)
- Corporate Functions (internal policies on facilities, travel, investments etc.)**
- Product Development (develop low CO2 offerings etc.)
- Business Models (shared or as-a-service offerings etc)
- Value Chain (procurement, manufacturing, embedded circularity principles etc.)**
- Energy Usage (energy consumption, clean energy creation etc.)**
- Impact Measurement (resource requirement, product impacts, services etc.)**
- Advocacy and collaboration (industry partnerships, cross-sectoral initiatives, government engagement)**
- Public policy and the regulatory environment**
- Consumer and customer demand**
- Other (please explain)

**Is your company undertaking disclosures aligned with the Task Force on Climate-related Financial Disclosures (TCFD)?**

Yes

No

- No
- Not sure**

To what extent has the UN Global Compact had impact on how your company addresses the environment? Select only one choice.

- 1: None
- 2: Minimal
- 3: Moderate
- 4: Significant**
- 5: Essential

Which of the following UN Global Compact offerings had impact on how your company addresses the environment? Select all that apply:

- Universal value of the ten principles**
- Tools and resources
- In-person event**
- Online event**
- Support from Local Network**
- Action Platform participation**
- Special Initiatives (e.g. CEO Water Mandate, Sustainable Ocean Principles, SDG Ambition)**
- Completing the annual Communication on Progress**
- Public policy dialogue
- Other (please explain)

What challenges does your company face in advancing Environmental Stewardship? Select all that apply:

- Lack of financial resources
- Lack of support from top management

- Competing strategic priorities
- Lack of knowledge
- No clear link to business value
- Lack of recognition from investors
- Implementing strategy across business functions
- Extending strategy throughout the supply chain**
- Extending strategy throughout subsidiaries
- Difficulty due to operating environment (e.g., conflict area, poor state governance)
- Global disruption due to unanticipated circumstances**
- Other (please specify)
- Nothing
- Not sure

## Section IId: Anti-corruption

This is not an evaluation of your company's policies and performance. The survey is strictly used for information gathering and it is important to answer accurately. All information provided will be treated in strict confidence and is anonymous.

***Principle 10: Businesses should work against corruption in all forms, including extortion and bribery***

Do you have policies or practices in place related to Anti-corruption?

- Yes**
- No

How does your company take the anti-corruption principle into account in its policies or practices? Select all that apply:

- Explicit policy addressing anti-**

- Explicit policy addressing anti-corruption**
- Within an overall corporate code or principles**
- Within a code of ethics**
- Within a code of ethics specifically for suppliers**
- Zero-tolerance policy towards corruption**
- Specialized unit within the company (e.g. an ethics/compliance officer, oversight board)
- Pre-approval of facilitation payments required**
- Political donations publicized**
- Policies limiting the value of gifts**
- Policies on donations to charitable organizations**
- Policy against collusion
- Whistleblower policy including protection against retaliation
- Other (please specify)
- 
- Unsure

What actions does your company take to implement the anti-corruption principle? Select all that apply:

- Management systems addressing bribery and anti-corruption**
- Corruption risk assessment**
- Corruption impact assessment**
- Anti-corruption policy is publicly accessible**
- Anonymous hotline for reporting of corruption instances
- Sanction system for corruption breaches by employees
- Country Managers sign "no bribery" certifications
- Report on profits, income taxes and subsidies of the countries of operation**

**Report on profits, income taxes and subsidies at the country of operation level**

Processes to enable reporting of corruption and bribery

**Terminate contracts with suppliers if corruption occurs**

**Training and awareness programmes for employees**

**Supply chain and subcontracting arrangements**

Record instances of corruption

**Record facilitation payments and gifts**

**Monitor and evaluate performance**

Public disclosure of anti-corruption policies and practices

Engage in collective action

Participate in industry or issue-specific initiatives

**Multi-stakeholder dialogue**

Other (please specify)

Unsure

To what extent has the UN Global Compact had impact on how your company addresses anti-corruption? Select only one choice.

1: None

2: Minimal

3: Moderate

**4: Significant**

5: Essential

Which of the following UN Global Compact offerings had impact on how your company addresses anti-corruption? Select all that apply:

**Universal value of the ten principles**

- Tools and resources
- In-person event**
- Online event**
- Support from Local Network**
- Action Platform participation**
- Special Initiatives (e.g. SDG Ambition)
- Completing the annual Communication on Progress**
- Public policy dialogue
- Other (please explain)

**What challenges does your company face in addressing Anti-Corruption? Select all that apply:**

- Lack of financial resources
- Lack of support from top management
- Competing strategic priorities
- Lack of knowledge
- No clear link to business value
- Lack of recognition from investors
- Implementing strategy across business functions
- Extending strategy throughout the supply chain**
- Extending strategy throughout subsidiaries
- Difficulty due to operating environment (e.g., conflict area, poor state governance)
- Global disruption due to unanticipated circumstances
- Other (please specify)

Nothing

Not  
sure

### Section III

## Contribution To Sustainable Development Goals And Impact

This is not an evaluation of your company's policies and performance. The survey is strictly used for information gathering and it is important to answer accurately. All information provided will be treated in strict confidence and is anonymous.

Note on terminology: The terms corporate responsibility and corporate sustainability are used interchangeably in this survey - and are defined as a company's delivery of long-term value in financial, social, environment and ethical terms - covering all Ten Principles of the UN Global Compact.

Does your company take actions to advance the Sustainable Development Goals (i.e. the Global Goals)

Yes

No

Has your company conducted an assessment of its positive impacts related to the Global Goals along the value chain?

Yes

No

Has your company conducted an assessment of its negative impacts related to the Global Goals along the value chain?

Yes

No

At what point along the value chain do you assess your impacts related to the Global Goals?

Raw materials

Suppliers

Inbound logistics

Company operations

Distribution

Product use

**From your perspective, what would you say is your company's current impact on each of the Global Goals?**

	We are not aware of the impact that our company has on this goal	Significant negative impact	Somewhat negative impact	No impact	Somewhat positive impact	Significant positive impact
Goal 1. No poverty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Goal 2. Zero hunger	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Goal 3. Good Health and Well-Being	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Goal 4. Quality Education	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Goal 5. Gender equality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Goal 6. Clean water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Goal 7. Affordable and clean energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Goal 8. Decent Work and Economic Growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Goal 9. Industry, Innovation and Infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Goal 10. Reduce inequalities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Goal 11. Sustainable Cities and Communities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Goal 12: Responsible Consumption and Production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Goal 13. Climate action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Goal 14. Life below Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Goal 15. Life on Land	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Goal 16. Peace, Justice and Strong Institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>



Which of the following Global Goals does your company currently prioritize? Select all that apply:

- Goal 1. No poverty
- Goal 2. Zero hunger
- Goal 3. Good Health and Well-Being
- Goal 4. Quality Education
- Goal 5. Gender equality
- Goal 6. Clean water and sanitation
- Goal 7. Affordable and clean energy
- Goal 8. Decent Work and Economic Growth
- Goal 9. Industry, Innovation and Infrastructure
- Goal 10. Reduce inequalities
- Goal 11. Sustainable Cities and Communities
- Goal 12: Responsible Consumption and Production
- Goal 13. Climate action
- Goal 14. Life below Water
- Goal 15. Life on Land
- Goal 16. Peace, Justice and Strong Institutions
- Goal 17: Partnerships for the Goals
- None
- Unsure



Has your company set targets to advance Goal 1?

- Yes**
- No

If so, when do you aim to achieve these targets?

- 2021-2025**
- 2026-2030
- Beyond 2030/target is not time-bound

Does your company take action on Goal 1?

- Yes**
- No

Does your company develop products and services that contribute to Goal 1?

- Yes**
- No

Does your company assess its impact on Goal 1?

- Yes**
- No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 1?

- Significant negative impact
- Negative impact**
- No impact
- Positive impact
- Significant positive impact
- Do not know

Does your company ensure that 100% of employees across the organization earn a living wage?

**Yes**

No



Has your company set targets to advance Goal 2?

**Yes**

No

If so, when do you aim to achieve these targets?

**2021-2025**

2026-2030

Beyond 2030/target is not time-bound

Does your company take action on Goal 2?

**Yes**

No

Does your company develop products and services that contribute to Goal 2?

Yes

**No**

Does your company assess its impact on Goal 2?

**Yes**

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 2?

Significant negative impact

**Negative impact**

No impact

- Positive impact
- Significant positive impact
- Do not know

Does your company increase productivity, efficiency and nutrition profile of all food in your operations and portfolio?

- Yes**
- No



Has your company set targets to advance Goal 3?

- Yes**
- No

If so, when do you aim to achieve these targets?

- 2021-2025**
- 2026-2030
- Beyond 2030/target is not time-bound

Does your company take action on Goal 3?

- Yes**
- No

Does your company develop products and services that contribute to Goal 3?

- Yes**
- No

Does your company assess its impact on Goal 3?

- Yes**
- No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 3?

- Significant negative impact
- Negative impact
- No impact**
- Positive impact
- Significant positive impact
- Do not know

Does your company provide healthcare for all employees, including access to contraception and family planning?

- Yes**
- No



Has your company set targets to advance Goal 4?

- Yes**
- No

If so, when do you aim to achieve these targets?

- 2021-2025**
- 2026-2030
- Beyond 2030/target is not time-bound

Does your company take action on Goal 4?

- Yes**
- No

Does your company develop products and services that contribute to Goal 4?

**Yes**

No

Does your company assess its impact on Goal 4?

**Yes**

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 4?

Significant negative impact

Negative impact

**No impact**

Positive impact

Significant positive impact

Do not know

Does your company work with institutions where you operate to define needed skills and help build the future workforce pipeline?

**Yes**

No



Has your company set targets to advance Goal 5?

**Yes**

No

If so, when do you aim to achieve these targets?

**2021-2025**

2026-2030

Beyond 2030/target is not time

Beyond 2030/target is not time-bound

Does your company take action on Goal 5?

- Yes
- No

Does your company develop products and services that contribute to Goal 5?

- Yes
- No

Does your company assess its impact on Goal 5?

- Yes
- No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 5?

- Significant negative impact
- Negative impact
- No impact
- Positive impact
- Significant positive impact
- Do not know

Does your company have gender balance across all levels of management?

- Yes
- No



Has your company set targets to advance Goal 6?

- Yes

Yes

No

If so, when do you aim to achieve these targets?

**2021-2025**

2026-2030

Beyond 2030/target is not time-bound

Does your company take action on Goal 6?

**Yes**

No

Does your company develop products and services that contribute to Goal 6?

**Yes**

No

Does your company assess its impact on Goal 6?

**Yes**

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 6?

Significant negative impact

Negative impact

**No impact**

Positive impact

Significant positive impact

Do not know

Does your company maintain water stewardship in its policies and practices?

**Yes**

Yes

No

Does your company have net-positive water impact in water-stressed basins?

Yes

No



Has your company set targets to advance Goal 7?

Yes

No

If so, when do you aim to achieve these targets?

2021-2025

2026-2030

Beyond 2030/target is not time-bound

Does your company take action on Goal 7?

Yes

No

Does your company develop products and services that contribute to Goal 7?

Yes

No

Does your company assess its impact on Goal 7?

Yes

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 7?

Significant negative impact

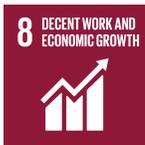
- Impact
- Negative impact
  - No impact**
  - Positive impact
  - Significant positive impact
  - Do not know

Does your company have 100% renewable energy operations?

- Yes
- No**

Does your company strive to be energy positive (supplying energy to the grid, markets, and communities where we operate)?

- Yes**
- No



Has your company set targets to advance Goal 8?

- Yes**
- No

If so, when do you aim to achieve these targets?

- 2021-2025**
- 2026-2030
- Beyond 2030/target is not time-bound

Does your company take action on Goal 8?

- Yes**
- No

Does your company develop products and services that contribute to Goal 8?

**Yes**

No

Does your company assess its impact on Goal 8?

**Yes**

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 8?

Significant negative impact

Negative impact

**No impact**

Positive impact

Significant positive impact

Do not know

Does your company mandate equal pay for equal work?

**Yes**

No

Does your company prepare its workforce for lifelong growth??

**Yes**

No

Does your company extend workforce policies to contractors and broader supply chain??

**Yes**

No

Does your company ensure that 100% of employees across the organization earn a living wage?

Yes

No



Has your company set targets to advance Goal 9?

Yes

No

If so, when do you aim to achieve these targets?

2021-2025

2026-2030

Beyond 2030/target is not time-bound

Does your company take action on Goal 9?

Yes

No

Does your company develop products and services that contribute to Goal 9?

Yes

No

Does your company assess its impact on Goal 9?

Yes

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 9?

Significant negative impact

Negative impact

No impact

Positive impact

- Impact
- Significant positive impact
  - Do not know

Does your company ensure sustainability of all business infrastructure and capital projects, in accord with established criteria?

- Yes
- No

Does your company extend core expertise to improve national infrastructure?

- Yes
- No



Has your company set targets to advance Goal 10?

- Yes
- No

If so, when do you aim to achieve these targets?

- 2021-2025
- 2026-2030
- Beyond 2030/target is not time-bound

Does your company take action on Goal 10?

- Yes
- No

Does your company develop products and services that contribute to Goal 10?

- Yes
- No

Does your company assess its impact on Goal 10?

- Yes**
- No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 10?

- Significant negative impact
- Negative impact
- No impact**
- Positive impact
- Significant positive impact
- Do not know

Does your company ensure diversity of its workforce is representative of the communities in which it operates?

- Yes**
- No

Does your company ensure your products and services are accessible to persons with disabilities?

- Yes**
- No



Has your company set targets to advance Goal 11?

- Yes**
- No

If so, when do you aim to achieve these targets?

- 2021-2025**

2021-2025

2026-2030

Beyond 2030/target is not time-bound

Does your company take action on Goal 11?

**Yes**

No

Does your company develop products and services that contribute to Goal 11?

Yes

**No**

Does your company assess its impact on Goal 11?

**Yes**

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 11?

Significant negative impact

Negative impact

**No impact**

Positive impact

Significant positive impact

Do not know

Does your company ensure it is positively contributing to the communities in which you operate?

**Yes**

No





## Has your company set targets to advance Goal 12?

- Yes**
- No

### If so, when do you aim to achieve these targets?

- 2021-2025**
- 2026-2030
- Beyond 2030/target is not time-bound

### Does your company take action on Goal 12?

- Yes**
- No

### Does your company develop products and services that contribute to Goal 12?

- Yes**
- No

### Does your company assess its impact on Goal 12?

- Yes**
- No

### To what extent has the COVID-19 pandemic impacted your work to advance Goal 12?

- Significant negative impact
- Negative impact
- No impact**
- Positive impact
- Significant positive impact
- Do not know

Does your company ensure that 100% of your sustainable material inputs are renewable, recyclable or reusable?

- Yes
- No

Does your company ensure 100% resource recovery, with all materials and products recovered and recycled or reused at end of use?

- Yes
- No

Does your company ensure zero waste to landfill and incineration?

- Yes
- No

Does your company ensure zero discharge of hazardous pollutants and chemicals?

- Yes
- No



Has your company set targets to advance Goal 13?

- Yes
- No

If so, when do you aim to achieve these targets?

- 2021-2025
- 2026-2030
- Beyond 2030/target is not time-bound

Does your company take action on Goal 13?

- Yes
- No

Does your company develop products and services that contribute to Goal 13?

- Yes**
- No

Does your company assess its impact on Goal 13?

- Yes**
- No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 13?

- Significant negative impact
- Negative impact
- No impact**
- Positive impact
- Significant positive impact
- Do not know

Has your company committed to science-based emissions reduction in line with a 1.5° pathway?

- Yes**
- No

Has your company committed to, or set, a net-zero emissions target by 2050 or earlier?

- Yes**
- No



Has your company set targets to advance Goal 14?

- Yes**
- No

If so, when do you aim to achieve these targets?

- 2021-2025**
- 2026-2030
- Beyond 2030/target is not time-bound

Does your company take action on Goal 14?

- Yes**
- No

Does your company develop products and services that contribute to Goal 14?

- Yes**
- No

Does your company assess its impact on Goal 14?

- Yes**
- No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 14?

- Significant negative impact
- Negative impact
- No impact**
- Positive impact
- Significant positive impact
- Do not know

Does your company extend producer responsibility through the end of life of products?

- Yes**
- No

Does your company ensure that operational waste (inputs and outputs) does not end up in the oceans?

Yes

No



Has your company set targets to advance Goal 15?

Yes

No

If so, when do you aim to achieve these targets?

2021-2025

2026-2030

Beyond 2030/target is not time-bound

Does your company take action on Goal 15?

Yes

No

Does your company develop products and services that contribute to Goal 15?

Yes

No

Does your company assess its impact on Goal 15?

Yes

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 15?

Significant negative impact

- Negative impact
- No impact**
- Positive impact
- Significant positive impact
- Do not know

Does your company ensure land degradation neutrality, including zero deforestation?

- Yes**
- No



Has your company set targets to advance Goal 16?

- Yes**
- No

If so, when do you aim to achieve these targets?

- 2021-2025**
- 2026-2030
- Beyond 2030/target is not time-bound

Does your company take action on Goal 16?

- Yes**
- No

Does your company develop products and services that contribute to Goal 16?

- Yes**
- No

Does your company assess its impact on Goal 16?

**Yes**

No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 16?

Significant negative impact

Negative impact

**No impact**

Positive impact

Significant positive impact

Do not know

Does your company support strong institutions and apply progressive non-discriminatory practices to all countries in which you operate?

**Yes**

No

Does your company ensure that it has zero incidences of bribery?

**Yes**

No



Has your company set targets to advance Goal 17?

**Yes**

No

If so, when do you aim to achieve these targets?

**2021-2025**

2026-2030

Beyond 2030/target is not time-bound

Does your company take action on Goal 17?

- Yes**
- No

Does your company develop products and services that contribute to Goal 17?

- Yes**
- No

Does your company assess its impact on Goal 17?

- Yes**
- No

To what extent has the COVID-19 pandemic impacted your work to advance Goal 17?

- Significant negative impact
- Negative impact
- No impact**
- Positive impact
- Significant positive impact
- Do not know

Does your company co-invest with communities where your people live and work?

- Yes**
- No

Does your company collaborate across your value chains to meet the SDGs?

- Yes**
- No

Does your company conduct training and awareness programmes for key decision makers across all business functions regarding the Global Goals and the extent of change needed to meet them?

- Yes
- No

How does your company take action to contribute to the Global Goals:

- Core business - Upholding the Ten Principles of the UN Global Compact**
- Core business - Align core business strategy with the Goals**
- Core business - Develop products and/or services that contribute to the Goals**
- Core business - Design business models that contribute to the Goals**
- Core business - Set corporate goals that are sufficiently ambitious, science-based and/or align with societal needs (including alignment with the SDG Ambition benchmarks).**
- Social investment and philanthropy - Voluntary financial contributions to charitable and/or non-profit organizations**
- Social investment and philanthropy - Voluntary non-financial/in-kind contributions to charitable and/or non-profit organizations
- Advocacy and public policy - Publicly advocate the importance of action in relation to the Goals**
- Advocacy and public policy - Participate in key summits and other important public policy interactions in relation to the Goals**
- Advocacy and public policy - Publicly communicate/disclose your Global Goal practices and impacts**
- Advocacy and public policy - Contribute to country's Global Goal National Action Plan**
- Advocacy and public policy - Advocate for policy alignment with the Global Goals
- Collaboration and Partnerships - Engage in partnership projects with public or private organizations**
- Collaboration and Partnerships - Participate in industry collaboration to advance the Goals**

What types of organizations have you partnered with? Select all that apply:

- Government
- United Nations**
- Other multilateral organization
-

Company

Customers

End consumers

**Non-governmental organization**

**Academia**

Industry associations

Other (please specify

**At what level(s) within the company do your partnership projects occur? Select all that apply:**

Global partnership

**Local partnership**

**What challenges does your company face in taking action to advance the Sustainable Development Goals? Select all that apply:**

Lack of financial resources

Lack of support from top management

Competing strategic priorities

Lack of knowledge

No clear link to business value

Lack of recognition from investors

Implementing strategy across business functions

Extending strategy throughout the supply chain

Extending strategy throughout subsidiaries

Difficulty due to operating environment (e.g., conflict area, poor state governance)

**Global disruption due to unanticipated circumstances**

Other (please specify)

specify)

- Nothing
- Not sure

## Section IV: Local Networks

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Is your company engaged in a UN Global Compact Local Network?

- Yes
- No
- Unsure

How does your company engage in your Local Network(s)? Select all that apply:

- Receives assistance with implementation of the Global Compact principles**
- Receives assistance with advancing the Global Goals
- Receives assistance with Communication on Progress (COP)
- Participates in policy dialogue
- Shares practices and experiences with peers**
- Engages in collective action**
- Networks with non-business stakeholders
- Networks with other companies**
- Involved in Local Network governance
- Other (please specify)

- Unsure

## How helpful is this engagement to your company?

	1. Not helpful	2	3	4	5. Extremely helpful
Receives assistance with implementation of the Global Compact principles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Shares practices and experiences with peers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Engages in collective action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Networks with other companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

## Section V: Sustainability Reporting

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Note on terminology: The terms corporate responsibility and corporate sustainability are used interchangeably in this survey - and are defined as a company's delivery of long-term value in financial, social, environmental and ethical terms - covering all Ten Principles of the UN Global Compact.

## Has your company reported on its sustainability performance?

- Yes
- No

## Section VI: Assessment & Progress

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The UN Global Compact recognizes that implementing universal principles into business strategy, culture and operations can be a long-term process and encourages participants to follow a path of continuous improvement.

Overall, how would you describe your company's current level of implementation of the UN Global Compact's Ten Principles?

On a scale of 1 to 5: 1= Beginner, 5= Advanced performer (select only one choice):

- 1 (Beginner)
- 2
- 3
- 4
- 5 (Advanced performer)

**Overall, to what extent has participation in the UN Global Compact helped advance corporate responsibility policies and/or practices within your company?**

*On a scale of 1 to 5: 1=No impact, 5=Would not have happened without being a participant (select only one choice):*

- 1: No impact
- 2: Minimally helped advance efforts
- 3: Moderately helped advance efforts
- 4: Significantly helped advance efforts**
- 5: Advancement would not have happened without being a participant

**To what extent do you agree with the following statements.**

**"The UN Global Compact has played an important role in...**

	1. Strongly disagree	2. Disagree	3. Neither agree nor disagree	4. Agree	5. Strongly agree
...shaping our company's vision"	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
...driving our implementation of sustainability policies and practices"	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
...guiding our corporate sustainability reporting"	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
...motivating our company to advance broader UN goals and issues, such as the Global Goals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

What challenges does your company face in advancing to the next level of implementation of the UN Global Compact's principles and the Global Goals? Select all that apply:

**Lack of financial resources**

- Lack of support from top management
- Competing strategic priorities
- Lack of knowledge
- No clear link to business value
- Lack of recognition from investors
- Implementing strategy across business functions
- Extending strategy throughout the supply chain
- Extending strategy throughout subsidiaries
- Difficulty due to operating environment (e.g., conflict area, poor state governance)

**Global disruption due to unanticipated circumstances**

- Other (please specify)

- None
- Unsure

In your view, how significant has the UN Global Compact been in spreading the practice of corporate sustainability worldwide?

- 1. No impact
- 2. Minimal
- 3. Moderate
- 4. Significant
- 5. **Essential**

Please rank the top 5 areas in which the UN Global Compact should focus its efforts. Please select 5 responses and then rank your responses in order of importance from 1 – 5, with 1 being the most important reason.

3 Promote universal values and principles to business

2 Advocate for global and national policies that support corporate sustainability

Increase capacity of Local Networks

1 Provide guidance for companies on how to implement sustainability into business strategies and operations

4 Establish stronger linkages with investors, educators and consumers

Collect and share good practice examples

5 Promote multi-stakeholder approach to addressing sustainability issues

Develop action platforms by issue or sector

Provide collective action opportunities

Other (please specify)

None

Unsure

## Section VII: Basic Company Information

This is not an evaluation of your company's policies and performance. The survey is strictly used for information gathering and it is important to answer accurately. All information provided will be treated in strict confidence and is anonymous.

Where is your company located?

Region

Country

Country

**Is your company a subsidiary?**

- Yes
- No**

**How many people does your company employ, including all locations?**

- 10 - 249
- 250 - 4,999**
- 5,000 - 50,000
- > 50,000

**How has COVID-19 affected your number of employees?**

- We have seen a noted increase in the number of people employed**
- Our employee numbers have remained approximately the same
- We have seen a noted decrease in the number of people employed

**What are your company's annual revenues (in US\$)?**

- < 25 million
- 25 – 250 million**
- 250 million – 1 billion
- > 1 billion

**How has COVID-19 affected your revenues?**

- We have seen a noted increase in revenues
- Our revenues have remained approximately the same**
- We have seen a noted decrease in our revenues.

Which of the following best describes your company? Select all that apply:

- Privately owned**
- Publicly traded
- Partially state-owned enterprise
- Fully state-owned enterprise
- Other (please specify)

Please select your industry:

When did your company join the UN Global Compact?

- 2000
- 2001
- 2002
- 2003
- 2004
- 2005
- 2006
- 2007
- 2008
- 2009
- 2010
- 2011
- 2012
- 2013
- 2014
- 2015
- 2016
- 2017
- 2018
- 2019

- 2020**

Please specify your corporate department/position:

- Board of Directors
- Chief Executive
- Sustainability/Corporate Responsibility**
- Human Resources
- Sales & Marketing
- Environment, Health & Safety
- Operations
- Public Affairs/Communications
- Legal/Compliance
- Finance/Accounting
- Business Development
- Logistics/Supply Chain
- Consultant
- Other (please specify)

**This is the last page of the survey. Please click the “>>” button to enter your survey and have your answers recorded. Thank you.**



## CLOSING STATEMENT



This is the result of our first year of adherence to the UNGC, next phase will include the establishment of a series of KPI's to monitor all the areas we have identified in order to improve. Black Cat reaffirms its commitment to adopting the UNGC principles into its daily operations and processes which fall in line within its corporate ethics and a corporate social responsibility blueprint that gives us the license to operate in the global market.

Last but not least, I extend my gratitude to our board members, HSE, QA/QC, HR, Procurement, Finance Team and all of Black Cat Head of departments and our engineers for their collaboration towards the CSR initiatives.

Yours Sincerely,

**Boussaina Kalo**

**Sr. Corporate Social Responsibility Officer**

