

IMSP-013 January 1st 2023

INTRODUCTION

Achieving ISO 45001:2018 certification exemplifies NCPL's commitment to our employees, community, and customers, by continuously evaluating and improving our safety processes to ensure we exceed the highest standards in the world. Certification offers NCPL a single, clear framework to improve their OHSE performance.

1.0 Purpose

The Occupational Health and Safety (OHSE) procedures that follow, form a system that provides a framework for managing OHSE Risks and Opportunities, preventing work-related injuries and illnesses, and providing safe and healthy workspaces at the NCPL port facility.

They incorporate considerations and decision-making into the ports day-to-day operations and strategic planning.

Additionally, the OHSE system provides a structured framework designed to achieve continual Health and Safety compliance beyond regulatory compliance, aiming to improve efficiency, reduce costs and minimize negative impacts on human Health and Safety.

2.0 Responsibility

The Department Managers are responsible for ensuring that the following procedures are effectively implemented and maintained.

3.0 Procedures

The procedural elements of the Occupational Health and Safety System are as follows:

NCPL's Occupational Health and Safety (OHSE) Objectives

The Key objectives and benefits that NCPL obtains from implementing the OHSE standard include the following:

- Prevention of workplace-related injury and/or ill health.
- Provide a safe and healthy workplace.
- Eliminate hazards and minimize OHSE risks.
- Take advantage of OHSE opportunities.
- Reduction of absenteeism and staff turnover, leading to increased productivity.
- Reduced cost of insurance premiums.



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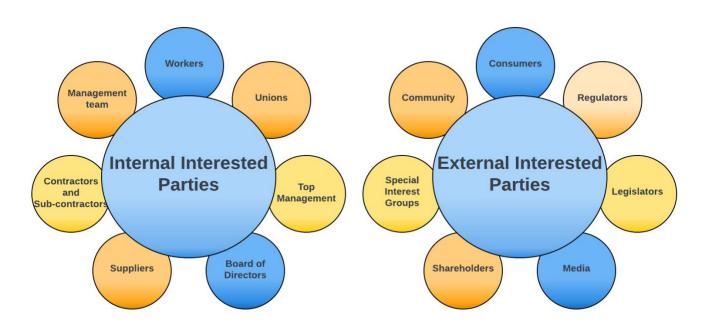
- Creation of a Health and Safety culture whereby employees are encouraged to take an active role in their own OHSE.
- Reinforced leadership commitment to proactively improve OHSE performance.
- Ability to meet legal and regulatory requirements.
- Enhanced reputation.
- Improved staff morale.
- Reduced risk and liability and improved security and emergency response capability.
- Enhance credibility, public image, and confidence as NCPL monitors and evaluates the OHSE impacts and aspects and positions themselves as leaders in the Occupational Health and Safety field.

OHSE Factors that Impact NCPL

Internal and External issues that impact our ability to meet our objectives are defined in the Company Manual section 4.0.

NCPL understands the requirements, needs, and expectations of our workers and interested parties about meeting OHSE objectives, as outlined below:

Internal and External Interested Parties.





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NCPL is committed to defining our position in the marketplace and understanding how relevant factors arising from legal, political, economic, social, and technological issues influence our strategic direction and our organizational context.

NCPL's Leadership and Commitment

NCPL is committed to, and is proactively involved in, implementing, and maintaining our organization's Occupational Health and Safety Management System as defined in the Company Manual section 5.0 and includes:

- Leadership and commitment.
- OHSE policy.
- Organizational roles, responsibilities, and authorities.
- Consultation and participation of workers.

Effective safety management supports our efforts to drive towards an increasingly positive safety culture by increasing the visibility of NCPL's support and improving the active involvement of personnel in managing safety risk.

NCPL ensures that all necessary resources, responsibilities, and accountabilities are allocated for the continual improvement of the Occupational Health and Safety Management System. The OHSE Policy is set out in the Company Manual.

NCPL's Organizational Roles, Responsibilities & Authorities

➤ The NCPL management structure organigrams and the lines of communication and authority are contained in the Company Manual.

Consultation and Participation of Workers and Others.

NCPL has established clear lines of communication, consultation, and participation of workers and others, with sufficient allocation of time and resources.

Occupational Health and Safety Committees and activities for meeting frequency and worker and other participation have been established.

Information that impacts OHSE is communicated at all levels of the organization. This is achieved by:



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- Periodic meetings with senior leadership to discuss processes, including OHSE issues.
- > OHSE committee meetings, with worker participation and representatives (where required).
- Identification and elimination of hazards (risk assessments).
- Development of training, talks, and presentations (This may include training tools for workers outside of NCPL's organization such as visiting contractors).
- Development of Safe Systems of work and work Instructions.
- Near miss reporting schemes with follow-up actions, including root cause analysis.
- Open door policy to talk to a safety representative and/or HR representative.
- Communication Notice boards, newsletters, email, and blogs.
- Occupational health promotion campaigns.

Reference: OH& Safety meetings activities and worker participation.

NCPL's Planning to Achieve our OHSE Objectives,

The planning requirements of the OHSE are defined in the Company Manual section 6.0 and include:

- > Actions to address risks and opportunities.
- Hazard identification and assessment of risks and opportunities.
- Determination of legal requirements and other requirements.
- Planning action.
- OHSE objectives as described earlier in this document.
- Planning to achieve OHSE objectives.

NCPL has incorporated risk-based thinking into our organization's culture. This includes establishing risk management procedures and processes to ensure that adequate risk and opportunity management principles are undertaken throughout the lifecycle of our operations, processes, Occupational Health and Safety Management System, products, and services.

NCPL uses the Risk & Opportunity Register to identify and evaluate risks associated with our Occupational Health and Safety Management System, specifically, changes in the



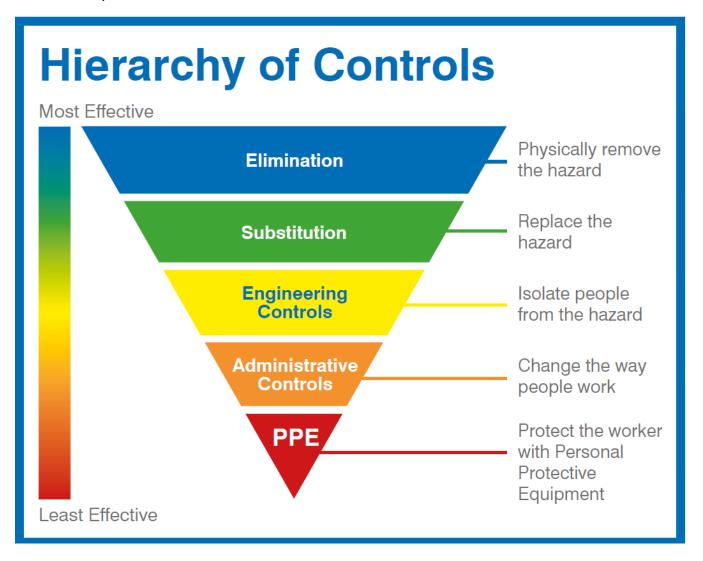
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organizational context, strategy, and legal requirements that relate to the needs and expectations of our workers and other interested parties.

Reference: Risk & Opportunity Register

Planning for the Identification and Elimination of Hazards and Reduction of OHSE Risks

NCPL has established controls for achieving a reduction in OHSE risks using the following Hierarchy of Controls:





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Hazard Elimination: Avoiding risks and adapting work to workers (integrating health safety and ergonomics when planning new workplaces and creating a physical separation of traffic between pedestrians and vehicles)

Substitution: Replacing the dangerous with the less or non-dangerous (replacing solvent-based paint with water-based paint)

Engineering Controls: Implementing collective protective measures (isolation, machine guarding, ventilation, noise reduction, etc.)

Administrative Controls: Giving appropriate instructions to workers (lock-out processes, induction, forklift driving licenses, etc.)

Personal Protective Equipment (PPE): Providing PPE and instructions for PPE use/ maintenance (safety shoes, safety glasses, hearing protection, chemical, and liquid resistant gloves, electrical protection gloves, etc.

Action is taken in various ways using management review meetings, safety committee meetings, design review meetings, setting objectives, reviewing procedures and policies, improving operational control, emergency preparedness planning, supplier evaluation, and other appropriate processes.

Findings are recorded as documented information and communicated to workers and other interested parties.

Reference: Activities for reducing OHSE Hazards and risks

NCPL's Supporting Role

NCPL's' supporting role for the requirements of the OHSE are defined in the Company Manual section 7.0 and relevant procedures and include:

- The provision of resources.
- Competency needs.
- Awareness training for the OHSE.
- Communications, both internal and external.



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NCPL is responsible for planning, providing, and maintaining the infrastructure and resources needed to achieve product and process conformance, including buildings, workspace, and associated utilities; process equipment (hardware and software); and supporting services (such as internal transportation, material handling systems, and communications systems)

Control of Documented Information

The requirements for Document and Data Control are contained in Company Manual section 7.0.

NCPL Document and Data control procedures are aimed at preventing the risk of unintended use of obsolete documentation information. It does not have the effect of preventing workers from obtaining a complete picture of the hazards/risks of their work.

Reference: Document control procedures

Operational Planning and Control.

Requirements for Operational Planning and Control are defined in the Company Manual section 8.0 and include:

- Eliminating hazards and reducing OHSE risks.
- Management of change.
- Procurement.
- Emergency preparedness and response.

All teams and departments implement OHSE procedures and controls using the appropriate supporting documentation, competent workers, and safe routines.

NCPL ensures that all operational activities, including product and service outputs, meet the applicable safety requirements and regulatory standards.

Management of Change

- It is recognized that accidents can occur when processes deviate from defined, established control measures.
- This may include changes in competent supervision and workers or new materials, machinery, and processes.



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- The organization has defined and implemented a process that considers change throughout the business.
- The change process is a documented system to acknowledge issues and receipt of the notification to ensure it is communicated and understood.

Reference: Management of changes

Procurement/Suppliers

- NCPL has put controls in place to ensure those purchased goods and services do not introduce hazards and expose workers to harm, including contractors.
- The OHSE Department is required to follow the NCPL procedures contained in the Company Manual.

Contractors and Outsourcing

NCPL has assessed current contractors, including due diligence competency checks.

- Contractor selection criteria are used to ensure services are within the scope of the task.
- NCPL controls protect contractors (workers) and other workers who may be exposed to hazards due to their activities.

Emergency Preparedness and Response Procedures

NCPL has planned for unexpected events. The risk assessment process for the identification of hazards highlights potential emergencies with possibly catastrophic consequences. Therefore, control measures have been implemented to mitigate these potential events.

- Workers may identify Emergencies at every level of the organization.
- Emergency plans have been formulated and tested to raise awareness of potential events and ensure effective control measures.
- Emergency preparedness and response are also tested within the internal audit plan.
- Testing emergency response plans is a critical function, including supervision, individual responsibilities, suitability of training and communication.

Reference: Emergency procedures.



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Performance Evaluation

Requirements for performance evaluation are defined in the Company Manual section 9.0 and include:

- Monitoring, measurement, analysis, and performance evaluation.
- Evaluation of compliance.
- Internal Audit.
- Management Review.

NCPL has established, implemented, and maintained a process for monitoring, measuring, and evaluating the performance of the OHSE.

- Criteria against which the organization will evaluate the OHSE performance.
- Methods for monitoring, measurement, analysis, and evaluation, as applicable, to ensure valid results.
- When the monitoring and measuring will be performed.
- When the results from monitoring and measurement are analyzed, evaluated, and communicated.

Activities that are monitored and measured include:

- Progress on meeting policy commitments, achieving objectives, and continual improvement.
- Occupational health complaints, health surveillance of workers, and work environment monitoring.
- Work-related incidents, injuries, ill health, and complaints, including trends.
- Effectiveness of operational controls and emergency exercises.
- Proactive and reactive actions affecting OHSE performance.
- Competence.
- Level of risk and types of control measure.
- Trends in incidents or corrective actions.

Reference: Performance evaluation activities.



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Internal Audits

An internal audit is a systematic method to check organizational processes and requirements of the IMS, as well as those detailed in the OHSE ISO 45001 standard.

The internal audit ensures that the processes are effective, and the procedures are being adhered to.

The internal audit program will aid the organization in achieving the OHSE objectives and targets. It helps to:

- Monitor compliance with policy and objectives.
- Provide evidence that all necessary checks are carried out.
- Ensure all current legislative and other requirements are met.
- Assess the effectiveness of risk management.
- Worker engagement leads to a positive safety culture.
- Identify improvement using 'fresh eyes' to review a process.
- Aid continual improvement.

NCPL ensures to communicate audit results to relevant interested parties, including workers, and sets realistic completion timescales for identified 'opportunities for improvement' or 'non-conformities'.

Top Management is made aware of deficiencies within the system to ensure that necessary resources can be allocated to mitigate the findings.

Audit results are reviewed as part of the management review process.

Reference: Internal Audit Activities.

Management Reviews

The aim of the review is for Top Management to assess the performance of the IMS and OHSE Management System to ensure it has been effective and suitable for the needs of the business, ultimately preventing injury or harm to workers.

The management review is also a planned activity to review objectives, including compliance, and to set new objectives.

On completion of the management review meeting, NCPL top managers and support decide what is needed to improve OHSE and satisfy the standard continuously.

NCPL records the meeting minutes with documented information.



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This information is communicated to the relevant interested parties and, where applicable, worker representatives.

Reference: Management Review Activities.

Continuous Improvement

Requirements for the continual Improvement of the OHSE are defined in the Company Manual section 10.0 and include:

- Incident, nonconformity, and corrective actions.
- Continual improvement.

The OHSE Manager uses a range of performance evaluation tools to make recommendations for improvement and achieve our Occupational Health & Safety Management System's intended outcomes.

Recommendations may emerge from workers' or interested parties' suggestions or concerns, OHSE Committee meetings, hazard reviews, task analysis, physical inspections, and internal audit findings.

To determine and select opportunities for improvement or to implement any necessary actions to meet the requirements of workers and relevant interested parties, NCPL drives improvement via the analysis of relevant data, which include:

- Risk and opportunity evaluations.
- Assessment of the changing needs and expectations of interested parties.
- Assessment of the changing needs of the business.
- The conformity of existing operations, products, and services.
- The effectiveness of our Occupational Health and Safety Management System and trends in Accident, Incident Frequency Rate (AFR).

NCPL also ensures that the OHSE Manager evaluates opportunities for improvement from daily feedback on operational performance as appropriate. Changes are typically implemented through the corrective action system.

Continued improvement is achieved through management reviews, audits, hazard mitigation, investigation of accidents, incidents, and near misses, and setting up preventive, corrective actions.



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Nonconformity and corrective action

NCPL has implemented the Incident Investigation Procedure for handling and investigating accidents, incidents, and near misses.

The procedure defines the controls for reporting and establishing the root cause of all types of accident, incident, or near miss that may occur on our premises and the implementation of preventive and corrective actions. Any staff member involved in an accident, near miss, or dangerous incident must report the occurrence.

Reference: Nonconformance and Corrective Action Activities.

