

## HEALTH, SAFETY & ENVIRONMENT(HSE) POLICY

Policy Number	Department	Policy Status	Issue Date
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## 1. POLICY OVERVIEW

Heckerbella Limited considers the Health & Safety of its employees, customers, others involved in its operation and the protection of its facilities and the environment where the company operates to be of high importance. Heckerbella Limited will operate efficiently and safely, in ways that minimize risk and hazards to its employees, equipment, facilities and impacts positively on the environment.

## 2. SCOPE

This policy shall apply to all Employees, business partners, Visitors, and stakeholders of Heckerbella Limited. All persons representing Heckerbella Limited outside of Heckerbella Limited Offices.

## 3. PURPOSE

The purpose of this document is to define and establish guidelines for Health and Safety management at Heckerbella Limited. At Heckerbella Limited, we are committed to:

- 3.1. Ensuring compliance with regulatory requirements and continuous improvement on HSE management.
- 3.2. Eliminating and reducing risk to as low as reasonably practicable through the deployment of an effective risk management strategy and best practices.
- 3.3. Being proactive and prepared to respond to potential emergencies.
- 3.4. Educating our Employees, Contractors and Customers on how their actions influence Health & Safety performance through regular training and awareness programs.
- 3.5. Recognizing and rewarding outstanding Health & Safety performance.
- 3.6. These commitments are in addition to our basic obligation to comply with all local and national Health & Safety laws and regulations.

## 4. POLICY STATEMENT

- 4.1. Heckerbella Limited will operate efficiently and safely, in ways that minimize risk and hazards to its employees, equipment, facilities and impacts positively on the environment. "Safe Operations" means that Health & Safety are equal in importance to our business objectives. Safety shall not be compromised for the sake of business expediency.
- 4.2. Heckerbella Limited shall ensure that Health & Safety risks associated with its operations are identified, evaluated and effectively controlled.
- 4.3. Health & Safety performance is an integral part of our business and achieving cost effective Health & Safety solutions is essential to our long-term business success.
- 4.4. Heckerbella Limited shall provide all necessary support to ensure Health & Safety performance is improved, monitored and sustained.
- 4.5. Heckerbella Limited emphasizes individual responsibility and accountability. It therefore requires everyone throughout the organization including all employees, business partners and others involved in its operations to adhere to Health & Safety standard and procedures on the job and encourage good Health & Safety practice of the job.
- 4.6. It is equally the duty of everyone engaged in company activities to exercise responsibility and care in the prevention of injury and ill- health to themselves and to others who may be affected by acts and omissions at work.
- 4.7. Heckerbella Limited shall work in partnership with industry associates, government, regulatory agencies and others for the provision of professional, technical and expert advice to Heckerbella Limited.



## 5. POLICY GUIDELINES

### 5.1. Key Expectations - Health, Safety & Environment

- 5.1.1. The Heckerbella Limited shall continuously measure and improve its HSE program and ensure communication of safety standards and procedures to all persons, using available awareness tools.
- 5.1.2. No person shall intentionally interfere with, or misuse assets provided by the company for safety, health or welfare.
- 5.1.3. All employees and business partners must comply with all established Health & Safety Rules and guidelines as contained in this document and any other HSE requirement or guidance document as may be provided by the Company.
- 5.1.4. All Heckerbella Limited Business Partners and Employees must obtain necessary permits and wear appropriate and approved PPE (Personal Protective Equipment) necessary to control the specific risk for the assigned task.
- 5.1.5. All employees, contractors or business partners are responsible and obligated and empowered to protect themselves, others and the environment by taking every precaution to prevent death, accidents and/or injuries by observing established safe working rule and to make the safety of co-workers the foremost consideration.
- 5.1.6. Each employee shall have the authority to stop or prohibit any work that they can reasonably foresee is likely to cause property damage, injury or ill-health to persons.
- 5.1.7. Adequate resources and other communication & monitoring tools shall be provided for effective health and safety management and emergency response

### 5.2. Smoking

- 5.2.1. All Heckerbella Limited facilities are non-smoking areas; Smoking is PROHIBITED within the premises and facilities
- 5.2.2. Smoking shall only be permitted in designated smoking areas well away from nearby buildings such that smoke does not drift into them. Violation of the policy shall be subject to disciplinary action.

### 5.3. Physically Challenged Persons

- 5.3.1. The company shall, make provision for the health and safety of any physically challenged person within its employ.
- 5.3.2. Employees with any form of physical challenge which may affect safe performance of work task in the work place or their safety during an emergency, should expressly notify HR.
- 5.3.3. Precautionary measures relevant to each individual situation shall be discussed and implemented as required. These measures shall also be applicable to visitors, contractors etc.



#### 5.4. **Visitors & Business Partners**

- 5.4.1. All visitors to the company shall go through security checks and are not allowed into the premises where adequate security and safety protocol is not followed. The checks aid to minimize the admittance of dangerous or hazardous items into the premises.
- 5.4.2. It is the responsibility of employees to ensure that their visitors follow established Health & Safety guidelines and emergency procedures while within Heckerbella Limited work environment or operations.
- 5.4.3. Business Partners performing work on behalf of the company shall accept full responsibility for complying with the company's HSE policy, and requirements of the Heckerbella Limited and any other relevant statutory provisions in respect of work being carried out.

#### 5.5. **Drugs and Alcohol**

- 5.5.1. Heckerbella Limited recognizes that the use of legal or illegal drugs and/or alcohol may hinder performance at work and can be a serious threat to health and safety resulting in harm to our people, the community, environment and physical assets.
- 5.5.2. The manufacture, sale, possession, cultivation, distribution or consumption of illegal drugs, alcohol or any intoxicating beverage within company premises or during work hours is prohibited.
- 5.5.3. All prescription or non-prescription medication should be taken in strict accordance with doctor's or manufacturer's instructions, and it is the responsibility of everyone to notify their manager or host, of any medication they are taking which could impact their safety or performance at work.
- 5.5.4. Outside working hours, alcohol may be consumed at company sponsored functions, provided the function is authorized by the Management and conducted in area not requiring performance of safety-sensitive function or for the participants to operate any automobile or machinery or enter Heckerbella Limited operational premises.
- 5.5.5. Where alcohol is to be consumed at a company sponsored function, the most senior manager present is responsible for the conduct of the function. He or she shall ensure that alcoholic beverages are not made available or offered in a manner that encourages excessive consumption and that the ability of attendees to travel home safely is considered.
- 5.5.6. Heckerbella Limited recognises the benefits of, counselling and rehabilitation. All persons requiring such shall be managed in an effective, fair and constructive manner.
- 5.5.7. Heckerbella Limited shall comply with Federal and State Drugs laws and regulations. Necessary disciplinary actions shall be used to enforce this policy and any other policy relating to drug and alcohol.

#### 5.6. **Incident Reporting and Monitoring**

- 5.6.1. It is the responsibility of all employees to report any work-related incidents to the HR department (whether or not the incident resulted in injury or harm). HR Manager shall ensure that investigations on reported incidents are carried out, root causes identified, and corrective measures implemented to prevent future reoccurrence.



- 5.6.2. A record of incident statistics shall be kept by the HR department to track work related accidents and ill-health and identify trends.
- 5.6.3. The HR department shall be responsible for investigating any work-related incidents and ill-health occurring within his/her zone.

#### 5.7. **Journey Management**

- 5.7.1. Heckerbella Limited journey management system places due consideration to the safety of personnel, material and equipment. All travel shall be done in line with the Company's Travel Policy.
- 5.7.2. Employees embarking on a journey in the interest of the company by land, air or water must have specific travel plans and the integrity and safety of the mode of transportation shall be the first consideration.
- 5.7.3. Heckerbella Limited encourages restriction on night journey or when environmental conditions are unsafe.
- 5.7.4. Only trained and competent persons shall be authorized to operate vehicle or machinery used to transport persons, materials or lift equipment's on behalf of Heckerbella Limited.

#### 5.8. **Seat Belt**

- 5.8.1. Heckerbella Limited values the lives and safety of employees and recognizes seat belt use as a measure towards reducing the impact of Traffic Accidents on drivers and passengers in accordance with Nigerian traffic laws.
- 5.8.2. All employees and their passengers are required to wear a seat belt, regardless of seating position, when traveling in any vehicle while conducting company or personal business.
- 5.8.3. This requirement applies to business travel in a vehicle owned by the company, in a rental vehicle and in a vehicle owned by an individual employee, regardless of whether the employee is compensated for the use of his or her vehicle.
- 5.8.4. Where an employee is provided a company-owned vehicle that is used in the course of his or her employment and is also available for that employee's personal use, that employee, together with all passengers who occupy the vehicle at any time and for any purpose, whether business-related or personal, are required to use seat belts at all times the vehicle is in motion.
- 5.8.5. Where vehicle is driven by a company designated driver, the driver shall not commence a journey until all occupants of the vehicle, both front and rear seat passengers have fastened their seat belts.
- 5.8.6. The Company shall comply with all Federal and State road traffic laws and shall use where necessary, disciplinary actions to enforce this policy.

#### 5.9. **First Aid and Medical**

- 5.9.1. The company ensures there is an "Appointed Person" (HSE personnel or Safety Champion) to take charge and administer first aid in the event where a person becomes ill or injured and to implement emergency procedures where necessary. Safety Champions shall be appointed in all locations and communicated to all employees. Line managers are encouraged to let their team members act as Safety Champions and consequently facilitate the effective management of Health & Safety within the company.



- 5.9.2. First aid boxes shall be provided at all Heckerbella Limited locations and managed by the respective appointed person.
- 5.9.3. In the event of an emergency, the Safety Champion of that office location must be notified.
- 5.9.4. Arrangements shall be made by HR department and support of the appointed person to evacuate any employee negatively-affected during an incident to the nearest HMO approved hospital.

#### **5.10. Emergency Procedure**

- 5.10.1. The HR manager shall be responsible for developing and implementing training programs for employees on emergency evacuation procedures.
- 5.10.2. Emergency procedures shall be properly communicated, and appropriate signs shall be clearly displayed. Employees are expected to familiarize themselves with the escape or exit routes within their immediate environment and guide their visitors through these routes during emergency evacuation.
- 5.10.3. It is the responsibility of respective Safety Champions to coordinate emergency procedures at the various locations direct evacuees to the assigned muster point and ensure everyone is accounted for.
- 5.10.4. Adequate Fire extinguishers and exit route shall be placed and identified at all Heckerbella Limited facilities. Access to them must always be unobstructed. Fire extinguishers shall be regularly checked by the Safety Champions to ensure that they are fit for use
- 5.10.5. Exit access and Muster points shall be clearly marked, kept clear always and their location communicated to employees by their respective Safety Champion.
- 5.10.6. Evacuation plans must be tested at least every 6 months to educate employees on fire safety and emergency procedures
- 5.10.7. All employees are expected to follow established emergency procedures and report any related Health and Safety issues to designated teams for prompt correction.

#### **5.11. Access Control**

- 5.11.1. Heckerbella Limited encourages Community or Public Relations but such interactions must not give room to uncontrolled entrance into offices and premises. Entrance into Heckerbella Limited premises by unauthorised person or persons is highly prohibited.
- 5.11.2. All employees, contractors and visitors must respectively display their identity cards or visitors tag at all times within the Company premises. Unauthorised access into assets areas and equipment rooms is prohibited.



#### 5.12. **Training**

- 5.12.1. All new employees shall receive basic HSE orientation as part of induction or onboarding process.
- 5.12.2. Refresher trainings and drills are performed for all employees at least twice a year and specific trainings and drills shall be conducted where there is a significant change to the risk profile within the work environment to the affected persons.
- 5.12.3. Training of Safety champions to facilitate safety in the work place shall be performed at least twice a year.
- 5.12.4. A review of Safety Champions be done bi-annually to ensure that HSE lists are updated and training is scheduled for all new (and untrained) representatives.

#### 5.13. **Facility Inspection**

- 5.13.1. Heckerbella Limited is committed to the identification, assessment and control of risks to people, the environment and assets.
- 5.13.2. HSE inspection shall be carried out on any facility intended to be used or occupied by Heckerbella Limited.
- 5.13.3. Upon inspection of the intended facility, Safety Champions or company shall make appropriate recommendations to the project owner, necessary to ensure that all identified risk and hazards to life, asset or environment are adequately eliminated or reduced to as low as reasonably practicable.
- 5.13.4. Requirements of this policy shall apply to both new and existing facilities requiring renovation or modifications.
- 5.13.5. The Safety Champions as part of its proactive monitoring of safety performance, shall carry out quarterly scheduled safety inspections and risk assessment of facilities. Facilities with high risk assessment rating shall have more frequent inspections while facilities with low risk assessment rating shall be inspected quarterly.
- 5.13.6. The Safety Champions shall track to closure, implementation of corrective actions identified during inspections/risk assessment.

#### 5.14. **Contractor Management**

- 5.14.1. Heckerbella Limited shall prequalify and evaluate every potential contractor for HSE suitability and competence as part of tender or bid process. Part of the evaluation process may require review of some relevant documents and visit to the contractor's site.
- 5.14.2. The contractor shall ensure adequate consideration is given to health and safety provision for maintenance or construction projects when tendering for jobs.
- 5.14.3. Contractor prior to start of any work on Heckerbella Limited site or on behalf of Heckerbella Limited, shall ensure that all foreseeable hazards associated with the work has been identified and the risk from those hazards properly assessed.
- 5.14.4. Contractor shall provide on demand such documents like HSE plans, method statements etc. outlining how the job will be carried out safely.



- 5.14.5. Heckerbella Limited shall inspect and evaluate all items to be purchased for the company which may otherwise have health and safety risk associated with its use or operation.
- 5.14.6. This policy and all other guidelines as may be provided shall apply also to sub-contractors or persons working on behalf of the contractor.
- 5.14.7. Agreements with contractors shall contain clauses that require the contractor's compliance with this policy and any related guidelines.
- 5.14.8. The HR and Safety Champions shall regularly review contractors HSE performance and advice management on the continued engagement of the contractor.

## **6. ENVIRONMENTAL MANAGEMENT**

- 6.1. Heckerbella Limited is committed to the protection and sustainability of the environment where it operates. Subsequently, it shall ensure to as far as reasonably practicable that only energy efficient and environmentally friendly resources are utilized in its operations and shall employ the principles of "Reduce, Reuse and Recycle" for waste management.
- 6.2. Handling, storage, transportation and disposal of hazardous materials shall be carried out only by competent and authorized persons.
- 6.3. It is the responsibility of employees or any person involved in Heckerbella Limited's operation to ensure efficient use of energy by switching off electrical appliances when not in use, optimize water usage, follow approved waste management process and to as far as reasonably practicable go paperless.
- 6.4. Heckerbella Limited shall in addition to these commitments, comply with the relevant local and national environmental laws and regulations.

## **7. RESPONSIBILITY**

### **7.1. Human Resources**

- 7.1.1. Must ensure all guidelines and policy are duly followed by all departments in Heckerbella Limited.
- 7.1.2. Provide support to Employees when necessary about HSE.
- 7.1.3. Identify and coordinate selection and training of safety champions.
- 7.1.4. Provide adequate support for Safety Champions.

### **7.2. Employee**

- 7.2.1. All Employees are expected to adhere to the HSE policy.
- 7.2.2. To report all HSE issues to Safety Champions on a time.
- 7.2.3. To watch out for their own safety and that of others.
- 7.2.4. To provide necessary support to the Safety Champions.

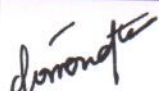

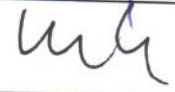
### 7.3. Safety Champions

- 7.3.1. To adhere and support the implementation of the HSE policy.
- 7.3.2. To investigate all HSE issues or incidence and provide adequate report.
- 7.3.3. To ensure periodic inspection in carried on all Heckerbella Limited's facilities and HSE requirements.
- 7.3.4. To guide and provide support to employees on HSE matters.

## 8. DEFINITION OF TERMS

Acronyms	Meaning
HSE	Health, Safety & Environment
HR	Human Resources Department
Appointed Person	Person who is nominated to take care of First Aid
Safety Champion	Person who is nominated to coordinate evacuation within their work area. This person shall also act as the Appointed Person
First Aid	Immediate help given to an injured person before professional medical care is available
HMO	Health Management Insurance Company for Heckerbella Limited Employees
Company	Heckerbella Limited.

## APPROVAL

Approval	Name	Job Title	Signature	Date
Reviewed by	Patience Diamond	H.R.M		22/10/18
Reviewed by	Peter Okiti	CDO		15-10-18
Approved by	Yemi Keri	CEO		29/10/18.