

Bharat Nirman Limited

(CIN No: U45209TG2011PLC073659)

◀ **Occupational Health & Safety Policy** ▶

FOREWORD

Bharat Nirman Limited is committed to the Health & Safety of all our employees. The purpose of the Health & Safety policy and procedure is to guide and direct all employees to work safely and prevent injury, to themselves and others.

All employees are encouraged to participate in developing, implementing, and enforcing Health & Safety policy and procedure. All employees must take all reasonable steps to prevent accidents and never sacrifice safety for expedience.

Our goal is to eliminate or minimize hazards that can cause accidents at work place. It is company policy that all employees be given a copy of the policy manual and be familiar with its contents.

This policy will be reviewed annually. Together we can achieve a safe and happy work environment.

Have a safe work... 

Bharat Nirman Limited is committed to the goal of providing and maintaining a healthy and safe working environment, with a view to continuous improvement.

This goal is only achievable by adherence to established objectives striving to exceed all obligations under applicable legislation, and by fostering an enthusiastic commitment to health, safety and the environment within Bharat Nirman Limited personnel, contractors and visitors.

In-Particular

Management, working in cooperation with the “Health and Safety Committee”, will strive to take all reasonable steps to reduce workplace hazards to as low as reasonably achievable.

HOD’s and Managers are held accountable for the health and safety of all employees under their supervision. This includes responsibility for applicable training and instruction, appropriate follow-up on reported health and safety concerns, and implementation of recommended corrective action. This accountability is integrated into the performance appraisal system.

Field level employees, workers and visitors are expected to perform their duties and responsibilities in a safe and healthful manner, and are accountable for the Health and Safety of themselves and others.

Bharat Nirman Limited is committed to providing all necessary trainings and instructions to ensure that appropriate work practices are followed on the job, and to promote their use off the job.

If necessary, Bharat Nirman Limited will take disciplinary action where individuals fail to work in a healthy and safe manner, or do not comply with applicable legislation or corporate policies and procedures.

Health, safety, the environment and loss control in the workplace are everyone’s responsibility. Bharat Nirman Limited expects that everyone will join in our efforts to provide a healthy and safe working environment on a continuous day to day basis. Only through the dedication and efforts of all individuals can Bharat Nirman Limited succeed in providing a healthy and safe working environment.

Health and Safety Policy

Bharat Nirman Limited is a construction, contracting and infrastructure development company where human capital is its greatest asset. Bharat Nirman Limited recognizes that

Occupational Health & Safety (OH&S) is critical to its sustainability since human capital is integral to its success and growth.

Every Bharat Nirman Limited employee, business associate, vendor, contractor, stake holder will strive towards the OH&S obligation and commitment.

Below are the guidelines that should be adhered to by all stake holders to ensure a good and Vibrant OH&S ecosystem:

- Bharat Nirman Limited encourages its employees to sign up for health insurance plan to ensure good health of its stakeholders.
- Bharat Nirman Limited encourages its employees, stakeholders to Comply with relevant OH&S plan as required by the government and go above and beyond the required compliance.
- Bharat Nirman Limited to adopt measures that ensure a work place free of disease/germs and health safety related issues.
- Bharat Nirman Limited expects its stake holders to use the helmet while driving 2 wheeler, wear Seat Belt while driving 4 wheeler and walk on footpath/pavements while commuting to train stations.
- Every facility of Bharat Nirman Limited to have an emergency medical kit consisting of OTC drugs and first aid kits which may be required by its personnel.
- The facility administration of Bharat Nirman Limited to ensure daily cleaning and moping of floors with disinfectant to ensure a germ free environment.
- Keeping in mind that India is a hot country, Bharat Nirman Limited provides free of cost hydration services such as purified water and other hydrating fluids to all its employees, customers, business associates, vendors, contractors and stakeholders.
- All of the Bharat Nirman Limited premises throughout the country are secured with CCTV Surveillance and physical security guards and a documented visitor entry system along with RFID tags for entry and exit.

Responsibilities

Our safety program is the responsibility of all levels of company employees. The chain of responsibility is as follows:

- Construction staff report to the site supervisor.
- Site supervisor, engineers, drivers, operators and surveyors report to the safety officer.
- Safety officer reports to the HR manager.
- All employees are responsible for the health and safety of all visitors, vendors, contractors brought on site by them, and to ensure that they are aware of and follow all company safety rules and procedures at a minimum.

Construction Staff

Construction staff is accountable to the construction supervisor/engineer for ensuring that all aspects of Occupational Health & Safety policy are followed.

Employees must take an active role in protecting and promoting their health, safety and accident prevention. You must not perform activities that jeopardize your health and safety or that of others.

Construction Supervisor/Engineer

The construction supervisor/engineer is accountable to the safety officer and is responsible for ensuring the Occupational health & safety policy is followed. They must provide leadership in all aspects of Health and Safety including developing policy and procedure. They are also responsible for ensuring proper procedures are followed in the lacquer areas for pouring, mixing and storing flammable products.

Planning & Engineering Staff

Planning & Engineering staff is accountable to the safety officer for ensuring that Occupational Health & Safety policies are followed. They are responsible for all aspects of health and safety in their area of the office and sample areas.

Safety Officer

The safety officer is accountable to the HR manager and is responsible for Occupational Health & Safety performance for all employees at all levels. The safety officer must provide leadership in all aspects of health and safety activities at work or otherwise. The safety officer must take an active role in all aspects of safety.

HR Manager

The HR manager is responsible for the health and safety of all employees of the Company. The HR manager must ensure all policies and procedures are followed according to Occupational Health & Safety.

Duties

HR Manager:

- Ensure that all reasonable steps are taken to prevent accidents.
- Ensure that standards and procedures are developed and maintained.

- Be familiar with the Occupational Health & Safety act and any revised regulations and ensure they are followed.
- Ensure that all employees are instructed in the procedures and requirements of Occupational Health & Safety.
- Review accident reports, safety audits and other related material relative to health or safety.

Safety Officer:

- Ensure that all reasonable steps are taken to prevent accidents.
- Be familiar with Occupational Health & Safety act, the company policy and any other legislation pertaining to health or safety.
- Ensure all policies and legislation is followed by all levels of employees.
- Ensure all accidents are reported and investigated.
- Ensure employees are instructed in the procedures and requirements of Occupational Health & Safety.
- Review all accidents and near misses to determine root and basic causes, suggestion/implementation of changes to prevent re-occurrence.

All Other Employees:

- Comply with all Company Procedures, Safety Policy and requirements of Occupational Health & Safety.
- Be responsible for working safely and carrying out their duties with skill and care as to not cause accidental injury to themselves, fellow employees or the general public.
- Immediately report all injuries, near misses or potential hazards to their superior.
- Know the location of all fire extinguishers, fire alarms or other warning devices.
- Ensure all personal safety equipment is being used properly.
- Maintain clean and orderly work area.
- When in doubt.... ASK

Suppliers/Vendors/Contractors:

- Provide input for all hazardous material shipped to our work place/project site.
- Ensure all reasonable steps are taken to prevent an accident.
- Be familiar with Occupational Health & Safety act.

General Safety Rules:

- All accidents, injuries or near misses, regardless of their nature, shall be promptly reported to the safety officer.
- Wearing the safety clothing shall be appropriate to the duties being performed. Long pants, safety helmet and safety shoes are the minimum requirements. If working on high-rise areas wearing the safety belts and other necessary equipment shall be mandatory.
- Running is not permitted except in extreme emergencies.
- Smoking is not permitted in any part of the prohibited site area or office. You may only smoke in designated areas.
- Visitors and customers are to be escorted by the company staff while on project area/site.
- Hand tools are to be used for their intended purpose only.
- Riding on equipment is prohibited except where designated for operator.
- Horseplay, fighting or tomfoolery is strictly prohibited on Bharat Nirman Limited premises.
- All spacers are to be of equal proportion and undamaged. Damaged spacers are dangerous.
- Open lifts are to be stored on the floor or in assigned bunks. Do not stack an open lift; this act will result in disciplinary action up to and including dismissal.
- All spills will be immediately cleaned up and reported.
- Drawers and filing cabinets will be kept closed when not in use.
- Filing cabinet drawers are to be filled from the bottom up or the cabinet is to be securely fastened / anchored.
- Lifts and clutter will be cleaned up before the end of your workday.
- Aisles are to be kept clear at all times.
- Do not unload a truck alone under any circumstances, if someone cannot help you then wait or call someone else for help. (Applies on and off Bharat Nirman Limited property).
- Explosive material/property shall be kept and maintained in officially allocated area under specific maintaining conditions, rules and regulations as specified by the manufacturer/supplier. It must be under the control of senior officer of the particular site/project, and also under the supervision of the store's manager/in-charge.

Safety Tips:

- If you are not sure..... ASK.
- Follow instructions and don't take chances.
- Wear your personal safety equipment.
- Never operate equipment you have not been trained for.
- Keep your work area clean.

- Avoid injury by lifting correctly. If it's heavy ask for help.
- Make sure the job can be done safely.
- DO NOT unload a truck or any materials alone.

Pallets & Storage Racks:

All employees must ensure that pallets used to transport or store materials/containers are loaded, moved, stacked, arranged and stored in a manner that does not create danger to workers.

Bharat Nirman Limited must ensure that racks used to store materials or equipment are designed, constructed and maintained to support the load placed on them and are placed on firm foundations that can support the load.

Employees must report any damage to a storage rack to the manager as quickly as is practical. All managers and employees must take all reasonable steps to prevent storage racks from being damaged to the extent that their integrity as a structure is compromised.

First Aid:

Office(s) or Warehouse(s) must have a first aid kit on site; the following protocol must be followed:

- All employees must immediately report any occupational injury, accident or near miss to the safety officer or their supervisor.
- Supervisors must immediately tend to injuries and then report them to the safety officer.
- HR manager must immediately discuss the incident with the safety officer and injured persons.

The purpose of this procedure is to comply with Occupational Health & Safety act, workers compensation board and to determine the cause of the accident and make recommendations to prevent further re-occurrence. All reports of injury must be filed.

If an injury occurs a record must be kept and include the following:

- Name of employee/worker.
- Name and qualifications of person giving first aid.
- A description of illness or injury.
- The first aid given to the employee/worker.
- The date and time the illness or injury.
- The date and time the illness or injury was reported.

- Where at the work side the incident occurred.
- The work-related cause of the incident, if any.

The company/employer must retain the records kept for 5 years from the date the incident is recorded. A person who has custody of records must ensure that no person other than the employee has access to an employee's records unless:

- The record is in a form that does not identify employee/worker.
- The employee/worker has given written permission to the person.
- The Director of Medical Services or a person authorized by the Director.
- Requires to be produced under the act.

The company/employer must give an employee/worker a copy of the records pertaining to the employee/worker if the employee/worker asks for a copy.

Critical Injury Protocol:

First and foremost, always take whatever measures are required to provide proper care of an injured employee/worker.

If a critical injury has occurred and the employee/worker has been cared for, the branch manager, safety officer and W.C.B must be notified. The appropriate report must be completed as soon as possible; this is to ensure that important details are not forgotten.

A critical injury is an injury that:

- Places life in jeopardy
- Produces unconsciousness
- Results in substantial loss of blood
- Involves the fracture of a leg or arm, but not a finger or toe
- Involves the amputation of a leg, arm, hand or foot, but not a finger or toe.
- Consists of burns to major portion of the body.
- Causes loss of sight in an eye.

Accident Investigation Policy:

All accidents that result in injury or property damage or that could have resulted in serious injury or property damage (near miss) must be thoroughly investigated.

The investigation must determine the cause of the incident so that appropriate action can be taken to prevent recurrence.

The safety officer shall be responsible for conducting the investigation. The investigation report shall be completed as soon as possible after the incident and reported to the HR manager. The safety officer and appropriate supervisor shall determine what steps are to be taken to prevent recurrence.

Any disputes arising from the investigation will be investigated and arbitrated by the HR manager.

Alcohol & Drug Policy:

It is the responsibility of all employees to ensure an alcohol and drug free environment. If there is any awareness or suspicion that any employee, contractor, supplier or visitor is under the influence of illegal narcotics or alcohol, will be removed from the premises immediately.

Should an employee report to work while under the influence of such substances, the employee will be taken home either in a cab or by the HR manager.

DO's & DONT's at Project/Site Areas:

- Consumption of alcohol strictly prohibited, no one allowed drinking at camp/site and any of other part of working location. If any found they will be terminated from duties immediately.
- All of the staff must wear safety shoes, jackets and masks while on duty.
- Incharges, engineers and supervisors must wear safety helmets.
- Road diversion boards must keep at working locations.
- Warning signboards and night-vision ribbon must be arranged at deep cut and hill cutting locations.
- All of the staff should report their daily work report to concern incharge, engineer and/or supervisor.
- No one allow sleeping under the tippers/trucks or any other equipment at anytime as such nature is very dangerous, if anyone repeated such misbehavior they will be penalized.
- Blasting staff, rock breaking operators, supervisors and welders must wear eye glasses.
- While operating the equipment all of the helpers, operators and drivers must check and maintain machinery fuel level, lubricants level, grease, coolant, water and other required checkups at hourly or shift basis as required.
- CNG workmen must wear and use appropriate safety shoes, gloves and tools while on duty.

- All of the operators and drivers should have valid driving license. Apart from this, all of the staff who is working at site they must submit ID Proof, Address Proof, Residence Phone Numbers, Blood Group and 2 Passport Size Recent Colour Photos.
- Civil workmen and blasting workmen should strictly follow the industry safety norms at all the times.

Disciplinary Action:

Careless work and irresponsible behavior directly affect the quality of health and safety in the workplace. Even absenteeism influences safety by placing more duties on fellow employees.

The following instances shall be cause for verbal or written warning and possible dismissal.

- Absenteeism without cause.
- Health and safety violations.
- Poor conduct or misconduct.
- Theft.
- Sexual harassment.
- Racial discrimination.
- Carelessness.
- Willful damage to company property.
- Drugs or alcohol consumption.

Compliance with company and legislative safety standards is necessary to maintain a safe and healthy work environment. As with any program non-compliance issues must be dealt with.

The following is a guideline for disciplinary actions for safety infractions based on seriousness of the offence.

- First offence, employee will be given a documented verbal warning.
- Second offence, employee will be given a written warning and a one day suspension.
- Third offence, employee may be suspended or terminated (suspension or termination to fit seriousness of the offence).

Hazard Warning Signs:

Whenever possible, warning signs will be displayed where a potential hazard may cause injury. Warning signs must be strictly adhered to. Warning signs must be posted where hazards exist and must not be removed unless hazard has been controlled.

Environmental Policy

Bharat Nirman Limited is committed to the Protection of the Environment for Present and Future Generations. All Employees are responsible for incorporating into their planning and work the actions necessary to fulfill this commitment.

Bharat Nirman Limited will meet these responsibilities by endeavoring to provide the resources for continuing to:

- Design and manage our operations to meet or surpass applicable environmental laws.
- Work in partnership with customers, contractors, suppliers, associations and government agencies to promote the environmentally safe handling and disposition of materials and used/damaged products.
- Acquire knowledge and technologies to improve the environmentally save efficient use of our processes and products.
- Formulate and implement effective environmental emergency response systems.
- Involve our employees in our environmental programs and keep them informed of our performance.
- Promote employee awareness of this policy and enhance their capabilities to implement this policy.



Effective Date:

This Policy shall be in force and effective on and from 01st July, 2011.