
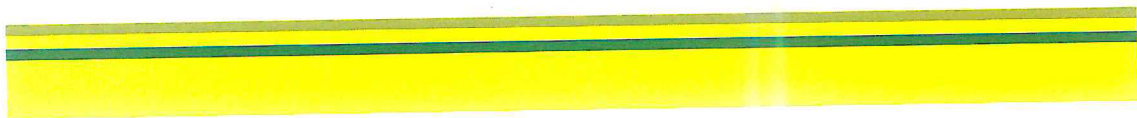


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MIKANO INTERNATIONAL LIMITED

HEALTH, SAFETY AND ENVIRONMENT MANUAL



The approval below certify that this Manual has been reviewed and accepted, and demonstrate that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

Action	Name	Function	Signature	Date
Prepared by	Edidiong Udoh	HSE Manager		02/06/22
Reviewed by	Adeyeye Adetona	HSE Coordinator		02/06/2022
Approved by	Peter Bourdillion	GH/HR/Admin.		02/06/22

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1.0 INTRODUCTION

The Mikano International Limited HSE Management System defines the principles by which we conduct our operations with regards to health, safety, and the environment.

All management communicates the HSE philosophy to all employees, customers, contractors, third parties associated with our business, and each Mikano organization must provide positive evidence of conformance to the system in its day-to-day business.

The HSE Management System Industry Standard model comprises eight interrelated components:

- Leadership and Commitment
- Policy and Strategic Objectives
- Planning and Procedure
- Organisation, Responsibilities, Resources, Standards and Documentation
- Implementation and Performance Monitoring
- Management Review

These are continuously improved by conformance checks on day-to-day standards and procedures (controls) on the management system (correction) through modifications to the management system (improvement).

1.1 Health & Safety Principles and Objectives


Mikano International Company Limited holds Health & Safety as a core business value and is committed to creating a future free of incidents and injuries, where:

- All stakeholders actively create safe environments;
- Leadership, passion and commitment are present at all levels;
- Working safely enhances quality, improves productivity and generates value;
- Attitude and behavior replace statistics as a measure of success;
- People are enabled to make safe choices about their own and their neighbor's safety and to challenge the environment in which they work;
- Good safety behavior is admired, respected and recognized across the organization;
- We have a well-trained & fully competent workforce actively contributing to the safe planning of their work;
- We have a good reputation for professionalism in service delivery with the zeal for consistence advancing and allowing her clients to delivery of their core business;
- Our business only welcomes those who support our vision and are willing to change – no compromise on safety.
- We are committed to the protection and enhancement of the environment. This will be delivered by implementing and maintaining an Environmental Management System.

1.2 Scope

The Management System provides the framework for how HSE aspects of Mikano International Limited activities will be addressed, beginning with a philosophy and commitment detailed in the HSE Policy and Principles and cascading to practices, plans, procedures and review for continuous improvement.

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Mikano International corporate culture, supported by the HSE Manual, gives priority to HSE considerations for its employees and its stakeholders and is fundamental for achieving profitability

1.2.1 Application

Mikano International's executive management is responsible for the implementation of the HSE Manual on all company's bases and offices. It is the responsibility of the company employees, contractors, and agents to comply with the Mikano International's HSE Management System as outlined in this manual. Compliance with the HSE Management System contributes to a high level of consistency of operational excellence in HSE Management in Mikano International Limited activities.

1.2.2 Control of the HSE Management System

The Mikano International Limited HSE Unit has overall responsibility for drafting, reviewing, and issuing the Mikano International Limited HSE Management System. Reviews of this manual will be made annually, unless otherwise determined by the HSE Department / Top Management on improvement review agree meeting.

2.0 HSE MANAGEMENT SYSTEM DESCRIPTION

The HSE Management System aims to apply best practice hazard management techniques to systematically identify and manage HSE risk that may be associated with the business of the company.

2.1. Structure of the HSE Management System

The structure of Mikano International HSE Management System incorporates several levels of control documents as shown in Figure 1

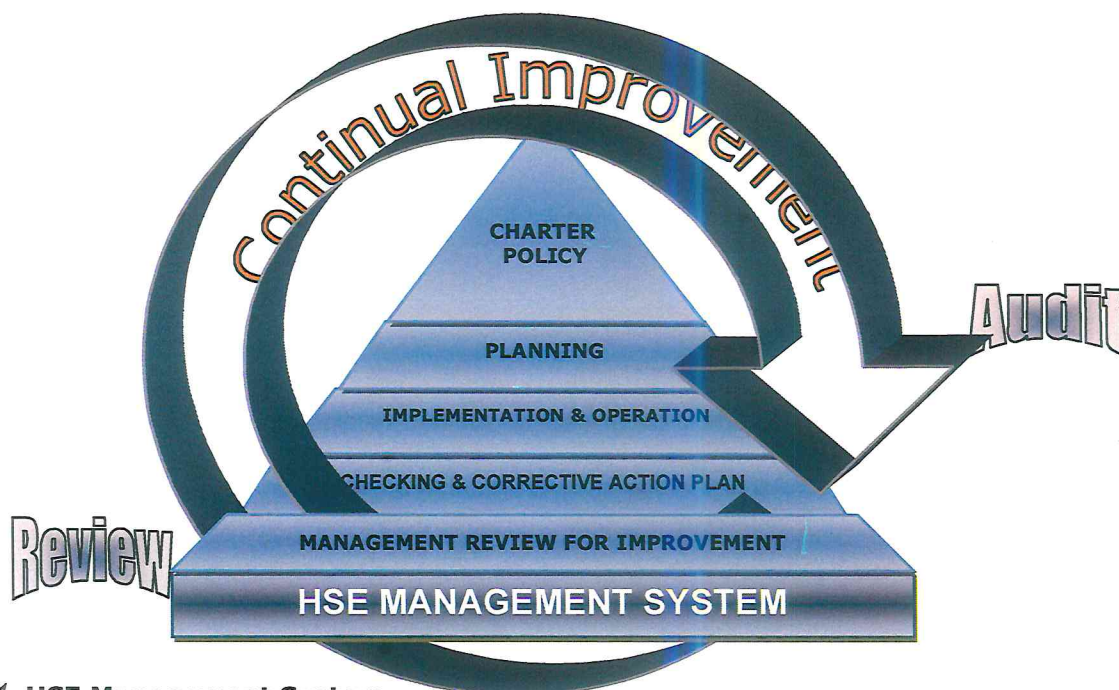



Figure1. HSE Management System

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2.2 HSE Rules

These rules provide the vision, objectives, and goals that describe how the HSE Management System works within the company to meet the objectives of the Mikano International Limited HSE Policy

2.3 Exceptions and Waivers

When Mikano International Limited is engaged in collaboration with other parties, such as joint ventures, partnerships or alliances, the nature of the operating system to be applied will be based on the Mikano International HSE Management System unless decided otherwise by collaboration management.

When MIKANO employees work under the managerial control of another organization, such as in supplemental labour arrangements (e.g., employees loaned to client organizations), their work may be performed in accordance with the HSE Management System of that organization, provided that a signed checklist (through a bridging document) indicating the arrangement is returned to the HSE Department

2.4 System Compliance

The Company HSE Management System is based on a continual improvement model. This System is designed to comply with local and international standards.

Key elements of the HSE Management System


HSE MS Element	Addressing
Leadership & Commitment	Top-down commitment and Group culture
Policy & Strategic Objective	Corporate intentions, principles actions with respect to HSE
Planning	Corporate HSE object and target goals, hazard and aspect identification
Implementation & Operation	Resources, role, responsibility, accountability, and authority
Checking & Corrective Action Plan	Monitoring and performance measurement, auditing, evaluation of compliance,
Management Review for continual improvement	Evaluated for sustainability, suitability, and adequate effectiveness

3.0 Leadership and Commitment

3.1 Leadership

The Top Manager and the Senior Management must provide strong and visible leadership and commitment, and ensure that this commitment is translated into the necessary resources, to develop, operate and maintain the HSE Management System and to reach the strategic objectives determined by the Mikano International Limited.

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3.2 HSE Commitment

Mikano International is committed to providing a healthy and safe workplace for all people at each of its offices and operational site, and to protecting the environment in accordance with applicable laws. Our commitment is based on the principle that accidents are preventable and risks will be maintained to a level that is ALARP (as low as reasonably practicable).

3.3 Leadership and Commitment Principles

General Executive management has provided the evidence of its commitment to the development and implementation of the HSE management system and continually improving its effectiveness by:

- Communicating to all employees of MIKANO INTERNATIONAL LIMITED the importance of effective HSE MS and conformity to standard requirement and meeting customer requirements as well as statutory and regulatory requirements;
- Ensuring that the HSE MS policies and objectives are established and are compatible with the context and strategic direction of the organization.
- Ensuring the integration of the HSE requirement into the Organization's business process.
- Promoting the use of the process approach and risk-based thinking;
- Ensuring that the resources needed for the HSE MS are available;
- Ensuring that the HSE management system achieves its intended results;
- Engaging and supporting persons to contribute to the effectiveness of the HSE Manual.
- Promoting improvement by conducting management review;
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibilities.

4.0 Policies and Strategic Objectives:

4.1 HSE Policy

Management recognizes that it is Mikano International Limited responsibility to provide continual commitment to our HSE Management System as it will protect all workers engaged in its activities from personal injury and health hazards; the policy statements which signify company overall commitment & intention are signed off and approved by top management and communicated to all employees and reviewed periodically.

–Occupational Health & Safety;

–Environmental;

The HSE policy is appropriate to the company's business strategy and the Mikano International culture, and sets the direction of the HSE Management System.

4.2 Strategic Objectives


The following HSE objectives describe how the Mikano International HSE vision will be attained.

4.2.1 HSE Management System Implementation

Implement and monitor a detailed HSE Management System for Mikano International's, and train all personnel in the use and application of the system.

4.2.2 HSE Department

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Maintain a multi-skilled group of HSE professionals to provide HSE assistance and implement the HSE Management System within Mikano International Limited.

4.2.3 Audit Protocols

Provide audit protocols against which implementation of the Mikano International HSE Management System and supporting practices and procedures can be measure.

4.2.4 Legislative Requirements

Identify HSE legislation relevant to our operations, follow the legislation that sets out minimum requirements and fundamental principles, such as the principle of prevention and risk assessment, as well as the responsibilities of employers and employees and inform Mikano International's personnel.

4.2.6 Performance Measurement

Continue to develop and implement measurement and reporting tools that encourage proactive HSE management, and based on those measurements, recognize excellent HSE performance.

4.2.7 Communication

Maintain effective communication networks to allow the HSE Management System to function to its full potential.

4.2.8 Emergency Response

Address emergencies in a structured manner so that predetermine priorities are maintain and that the impact of the situation is mitigate.

5.0. Planning:

5.1 Company HSE Objectives and Targets:

To stimulate a positive HSE culture throughout Mikano International Limited by providing leadership and awareness for the sole purpose of creating a culture that strives to eliminate incidents, which have the potential to harm our employees, visitors, reputation and equipment, the environment, or the communities in which we operate,


The company yearly targets and objectives will be compile, sign off and authorize by management and communicate to all employees through appropriate medium or through various line management or employees that are recognize as leaders within the various levels of the company such as Departmental head, who are in turn expected to communicate these HSE objectives and targets down their administrative chain via HSE meets, toolbox talks, induction programs and notices board as this promotes company active leadership, positive and visible HSE commitment behaviors at all levels within the company.

5.2 HSE Plan and Programs:

In agreement with meeting the HSE targets and objectives, a performance record/program in line with time bound plan aligned to company strategic goals is developed and reviewed periodically as the need arises; this is to ensure accountability and to measure commitment towards the realization of the Company HSE Objectives and targets.

5.3. Hazard and aspect identification:

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To guarantee all occupational Health and Safety hazards and environmental aspects are identified it is domineering to demonstrate that all HSE support activities ensure:

- All hazards with the potential to cause injury or any major asset damages, significant environmental impacts, and / or considerable adverse impact to our reputation have been identified, assessed and are suitably controlled.
- Hazards that are not suitably controlled, a list will be compiled to close out these outstanding deficiencies on priority basis via Safety Observations to line managers for close out.
- Exposure to these hazards has been reduced to a level that is as low as reasonably practicable.

Sequel to the above, generic risk and aspect identification assessments covering routine hazards and effects associated with High, Medium and Low Risks are identified with controls in place whilst a Task Specific Job Risk Assessment shall in turn be implemented as required for both routine and non-routine tasks to complement and to ensure full and detailed HSE assessment for the task at hand.

5.4. Environmental Planning:

In the areas of Environment which requires regulatory obligations, core service activities such as general waste management and disposal, sewage evacuation /disposal and treatment, noise / sound level measurement, grass cutting and removal of shrubs, general office/ drainage cleaning, Illumination measurement, Control of Liquid and Gaseous Emissions to Water, Air and Land, Land and Water Oil-Spillage Control (Pollution Prevention), Storage of fuel and hazardous Substances and contingency Planning for Environmental Emergencies are taken into cognizance.

5.4.1. Segregation of Waste and Storage

- colour coded bins as follows:

Organic Waste	Green
General Waste /Non-recyclable Waste	Black
Hazardous waste	Red
Mixed Recycling (Paper/Wood/Glass/Plastic/Cans)	Blue

5.4.1.1. Waste Disposal

An accredited waste disposal contractor in accordance with approved Waste management procedure shall dispose all wastes.


All subcontractors shall be made to comply with the waste disposal method herein established. Waste shall be disposed in two ways based on whether it has a value or not. Waste of "value" shall be sold or recycled or given out at no cost while waste of "no value" shall be disposed into either landfill or incineration in line with local authority regulations.

5.4.1.2. Waste Minimization

Management shall adopt waste minimization practices in all project sites and in Operation Base, with particular concern to packaging of campsite catering consumables and prefabrication yard materials.

5.4.1.3. Waste Documentation

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Waste Consignment Notes with proper records shall be maintained and updated

5.4.2. Noise Control

The use of heavy mechanical equipment for the execution of the Mikano International Limited operations increases the risk of exposing the workforce and third parties to critical levels of noise. Noise monitoring shall be carried out on regular basis and when required to ascertain the rate of noise in work areas and put preventive controls in place. At the time of purchasing or hiring any equipment, all Supervisory staff shall pay utmost attention and retain the responsibility of self-protection from high noise levels, activities mainly due to the operation of the following equipment:

- Earth moving machines.
- Cranes.
- Transportation equipment, trucks, forklifts.
- Power generating units.
- All motor powered equipment.

National / Nigerian Permissible Work Exposure Limits shall be strictly observed and, whenever in doubt, Supervisors shall adopt precautions by rendering compulsory the use of ear protectors or ear-plugs which will be provided by Mikano International Limited Management

5.4.3 ENVIRONMENTAL PROTECTION – GENERAL GUIDELINES

a) Fuel Storage Tanks

- Petroleum products shall be stored in areas designed to ensure non – compatible materials and wastes are segregated and located in designated areas to optimize control. Fuel Storage Tanks shall have the minimum following requirements to protect the environment and to prevent pollution:
- Fuel storage tank shall be properly install, including leak protection.
- There shall be a secondary containment (with high-density polyethylene (HDPE) liner) with bund walls
- Floors of all fuel stations need to be made impervious.
- Firefighting equipment must be available in the immediate vicinity of fuel tanks.
- Oil spill kit with a yellow colour waste bin shall be available.
- Signs for 'No smoking' shall be visibly placed within and around the vicinity.

b) Generator Area

Generator areas should have the following requirements:

Floors of all generators areas shall be made impervious.

- There shall be a spill kit / spill absorbent (Saw dust) near generator with red colour waste bin to collect oil rags /gloves / spilled material.
- Firefighting equipment (CO₂ or hydrant) shall be available in the immediate vicinity of the generator area.
- Grounding connection (with the measurement of the resistance)


c) Engine oil storage area

Engine Oil storage areas should comply with the following requirements:

The engine oil storage area shall have a secondary containment (with high-density polyethylene (HDPE) liner) with bund walls and roofing.

- Floors of all storage area shall be made impervious.
- Firefighting equipment (foam type) shall be available in the immediate vicinity.
- Oil spill kit with a red coloured waste bin should be available.
- Signs for 'No smoking' shall be visibly placed within and around the vicinity.

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d) Waste / condemned oil storage area

The waste / condemned oil storage areas should be properly located and should have the following requirement

- The waste oil storage area shall have a secondary containment with bund walls and roofing.
- In case if the waste oil is stored in plastic drums, the drums shall be free of leaks. Floors of all storage area shall be made impervious.
- Firefighting equipment (foam type) shall be available in the immediate vicinity of Oil tanks.
- Oil spill kit with an orange colour waste bin shall be available.
- Signs for 'No smoking' shall be visibly placed within and around the vicinity.

e) Waste storage areas

Wastes shall be stored in containers / drums that have been designed specifically for such purpose. Sufficient number of waste collection containers / drums shall be provided at all operational, residential, office and recreational areas. Waste storage areas shall

- Be located away from sensitive areas (surface water bodies, residential areas etc.)
- Be clearly fenced (to prevent access to live stock and unauthorized personnel).
- Be of sufficient size to accommodate generated waste volumes.
- Be provided with secondary containment with a roof and fire fighting equipment.
- Comply with applicable Local, Regional and Federal requirements if any.
- Floors of all storage area should be made impervious.

f) Sewage evacuation/ disposal

The Sewage evacuation / disposal will be carried out when required by a Government registered contractor. The sewage evacuation exercise will be monitored by HSE team. All sewage collected from septic tanks in facilities will be properly transported from evacuation point and disposed in a government approved dump site

g) Water Treatment Plant

The source of water for various purposes in all Mikano location / sites from borehole water. The water shall have physico-chemical parameters as per the standards stipulated by World Health Organization (WHO). In most areas, the source of water supply is from the boreholes, hydrants and GP tanks. The treatment plant will have at least filtration and chlorination facilities. (Filtration allows water to pass through a thick layer of sand and or filtering media. By so doing, the suspended and colloidal matter in water are partially removed.

h) Pest Control

Pest control shall be carried out regularly to keep the premises free of pests. Measures to be adopted shall include:


- Fumigation of the premises quarterly
- Rat Control Programme.
- Fogging of manholes drains and gutters if any.

5.5. Legal and Other requirements:

It is also important to note that the information detailed within this HSE Manual, does not in any way take superiority over the occupational Health and Safety and Environmental aspect laws/ acts/ regulations of any relevant laws or attempts to contravene them all.

However, in the light of the above and in the attempt to ensure the familiarization of Occupational Health, Safety and Environmental acts or other relevant legislations and requirements within the area in which Mikano International Limited operates, a procedure for

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identification of legal/other requirement register and evaluation of compliance is documented and maintained

Therefore, the above process is geared towards identifying legal and other requirements and maintaining a periodical evaluation of compliance with legislations on Safety, Health and Environment and Mikano International internal requirements for HSE Management system.

6.0. Implementation and Operations of Management System

6.1. Organization, Resources, Role and Responsibility

Define, document and communicate the roles, responsibilities and accountabilities to enable every individual to fulfill their role in improving HSE performance.

Expectations

- Define the interrelationships between individuals, operating groups, support functions, employees, clients and partners in joint activities, trade associations and regulatory bodies.
- Appoint and support a management team representative to act as the focal point for HSE matters.
- Ensure that each group and individual receives sufficient information and training to fulfill his or her role with respect to HSE.
- Allocate sufficient resources to support policies and work towards achieving objectives set for HSE issues.
- Ensure a system that provides and maintains effective procedures, resource material and records on HSE subjects.

Roles and Responsibilities

This section describes the roles and responsibilities of personnel with regard to the HSE Management System.

6.1.1. Managing Director / Chief Executive Officer

Chief Executive Officer / Managing Director is responsible for the HSE Management System and provides resources available for managing HSE in projects execution

Roles

- Ensure all team members are trained on the HSE Management System
- Ensure implementation of the HSE Management System
- Liaise with HSE unit on all HSE issues

Responsibilities

- Oversee the production and implementation of an HSE management plan for every office or project in accordance with the HSE Management System
- Follow HSE performance


6.1.2 Project Managers

Project Managers have a role in communicating the HSE Management System to clients in order to show our excellence in HSE management.

Roles

- Promote MIKANO INTERNATIONAL 's HSE Management System
- Manage HSE in project or office groups with assistance from dedicated HSE professionals

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Responsibilities

- Communicate information about the HSE Management System effectively to clients
- Consult with HSE unit for HSE information and assistance in the preparation of applicable documentation, such as tender bids

6.1.3 HSE Manager / HSE Advisor

The HSE team acts under the leadership of the Top Management. The team advises and assists offices, bases and projects in the implementation and monitoring of the HSE Management System.

Roles

- Provide high-quality HSE management services
- Ensure good application of HSE Management System
- Advise Subsidiary on the HSE issues

Responsibilities

- Maintain and continually improve the HSE Management System.
- Advise Mikano International employees and contractors of their HSE responsibilities.
- Identify HSE training needs and provide appropriate training.
- Prepare and review HSE documentation, as required.
- Report office and project HSE performance.
- Work with clients' representatives and regulatory bodies on HSE issues as required.

6.1.4 Employees

HSE demands individual participation at all levels of the Mikano International organization. Employees are expected to engage in HSE activities in their workplace.

Roles

- Uphold the requirements of the HSE Management System.
- Contribute to a Mikano International culture of strong HSE management principles.

Responsibilities

- Maintain a high degree of professional competency, personal initiative, and communication effectiveness.
- Assist with the HSE Management System implementation and provide feedback where appropriate.
- Assist in identifying training needs and undertake training as required.

6.1.5 Contractors and Subcontractors

HSE demands for all contractor of Mikano International organization. Contractors expected to engage in HSE activities in their various operations within the company premises or facilities


Roles

- Uphold the requirements of the Mikano International HSE Management System.

Responsibilities

- Maintain high standards of HSE management.
- Communicate and cooperate with Mikano International on HSE issues.
- Refer to Mikano International HSE professionals when clarification of procedures is required.

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- Adopt Mikano International HSE Management System or develop and submit their own system for review and comment

6.1.6 Visitor's

Any person or group of people within Mikano International organization are expected to partake in all HSE rules and regulation

Roles

- Take care to protect their health, safety, and that of other workers and to cooperate with Mikano International HSE Management System.

Responsibilities

- Following safe work procedures.
- Complying with rules and regulations.
- Wearing and maintaining appropriate personal protective equipment.
- Participating in training programs.
- To complete a visitor orientation before you go into or visit the workplace.

6.2 Documentation and document control

Document such as working procedure or instruction, form or record must be managed through the HSE-MS, which must be made available, when need arise and that availability is made to all personnel who have a need to use or access it via HSE unit.

It is also domineering to note that controlled documentation is maintained up to date as required and communicated by the HSE department.

Below you can find a list of documents and procedures useful for the HSE Management System.


6.2.1 Company documentation

- ✓ HSE Standards (Policies)
- ✓ HSE Management System
- ✓ Procedures
- ✓ Waste Management
- ✓ Incident Reporting & Investigation System
- ✓ HSE Performance Monitoring and Reporting
- ✓ Risk Assessment System.

6.2.2 The minimum local documentation required

- General documentation
- HSE Management System
- Plan of HSE Site visits
- HSE meetings records
- Risk Register/HSE Critical Activities
- HSE Training Plan
- Annual HSE Objectives & Targets
- Records of Incident Investigation Reports
- Emergency/Fire Response Plan
- HSE Performance evaluation record
- Permit to Work audit Form

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- Risks assessment document
- Waste Management
- HSE meeting and Safety Toolbox

All written procedures should be stated simply, unambiguously and understandably and should indicate the persons responsible, the methods to be used and where appropriate, performance standards and criteria to be satisfied

6.3 Competence, Training and Awareness:

Mikano International Limited has established the general requirements for the Training of Personnel within the requirements of the safety, health and environmental management system by the development of a training matrix where in particular, the maintaining and raising awareness for HSE impacts and risks for all new employees / temporary workers ,existing employees alongside contractors, visitors, sub-contractors; this is implemented via HSE induction programs, on-the job training, toolbox talks, in-house and external trainings, HSE stand downs, forums, workshops, participation in client's safety courses etc.

The HSE unit shall also ensure competence compliance monitoring of staff and training facilitation where required.

6.4 Communication:

This aspect of the HSE-MS addresses ways at which Mikano International Limited communicates internally for all levels the Safety, Health and Environmental Management System, communication with contractors and visitors alike within the workplace.

In addition, it describes the receiving of documents from other external and interested parties. These mediums, although not limited to the below highlights are as follows:

6.4.1. Internal Communication:

- HSE Meetings
- Toolbox Talks
- E-mails
- Memos
- Contractors' meetings
- HSE Monthly/Quarterly performance meetings

6.4.2. External received Communication:


- Clients' HSE forums / meeting
- E-mail
- Memos

6.5 Emergency Preparedness and Controls

Mikano International has procedure within the business for handling of emergency for the benefit of all staff it is geared towards ensuring Health, Safety and the sustainability & protection of the Environment via awareness & mitigation programs, Emergency preparedness, response & recovery contingency programs in the below structure.

1. HSE preventive / protection unit
2. Medevac services in partnership with retained Medical service providers
3. Community commonly crisis

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It is also pertinent to note that Mikano International Limited also maintains first aid services within work sites with trained first aiders and kits/equipment i.e. First aid box, kits and and operates health program (HMO).

6.6 Operational controls:

6.6.1 Mikano International Limited operates proactive and reactive safe operational controls which are geared towards risk elimination and reduction to ALARP through task planning, Risk assessment and other controls geared at ensuring competence, medical, equipment, procedural compliance requirements and of course adequate and effective monitoring; there are no repercussions to this top Management approved policy.

6.6.2 Contractor selection process is a very important key to ensuring HSE controls related to purchased goods, equipment and services; – The Management in liaison with the HSE team shall ensure all risks have been evaluated and considered prior to any contract for services required.

6.6.1 Contractors, Sub-Contractors' and Visitors Safety Guidelines:

6.6.3.1 Each approved contractor, sub-contractor and visitor shall comply with all applicable requirement of Mikano International Limited HSE Manual and any other required specifications or standards.

6.6.3.2 It is the responsibility of each contractor or sub-contractor to ensure that all work that they perform as required are conducted in a safe manner without risk of injury to persons and damage to equipment or property; hence it is therefore a requirement/responsibility of each contractor or sub-contractor to develop and implement a safety program in accordance with their operational HSE Manual.

6.6.3.3 The contractor or sub-contractor's safety program shall describe specifically what procedures they will adopt to prevent injuries and property and equipment damage while performing under the contract; this will include detailed method of safety work plans and scope


6.6.3.4 The contractor or sub-contractor's safety program shall include specific plans for safety training and/or induction and education of the contractors or sub-contractors' employees including regular safety meetings for various craft groups which should be documented and cited accordingly.

6.6.3.5 More so, it is of utmost importance that all visitors within Mikano International facilities receive a HSE induction to ensure HSE full compliance within company facility so as to eliminate or reduce risk of harm to as low as reasonably practicable.

6.6.4 Hazardous conditions in the workplace is also prevented through compliance monitoring of compiled standard operational procedures which in turn is extended to all Mikano International Limited operations, contractors and subcontractors such as the below which can be referenced accordingly.

- Hazard identification and risk assessment
- Aspect and impact identification procedure
- PPE procedures
- Safety Observation procedures
- Permit to work procedures

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- Job Risk Assessment
- Task Specific Toolbox Meeting
- Worksite induction procedure
- Accident and Near miss reporting procedure
- Measuring and monitoring procedure
- Management of Change procedure

6.6.5. Sign Boards and Caution Signs are displayed within all Mikano International facilities and offices as precautionary measures in the control or reduction of risk of harm/injury to personnel and impact on environment and prevention of deviations from HSE system standards/objectives.

6.6.6. Personnel Protective Equipment (PPE) is the last line of control that can save life; to promote its compliance and use with legislation and industry standards, all contractor and subcontractor must provide its employees working/visiting the company operational sites with appropriate PPE wears such as safety shoes, safety helmet, gloves, eye protection etc. Except stated otherwise that the Mikano International will provide in the contractor agreements.

6.7. Risk Assessment

Mikano International maintain procedures and methods to systematically identify the hazards and effects which may affect or arise from its activities regarding personnel, assets and the environment taking technical and local data into account.

The Mikano International employees are involved in the hazard identification and the reporting each week, identifying anomalies, taking action and discussing these during the weekly meeting. Mikano International record all the risk assessment analyses in a document.

The Risk Assessment Document ensures the safe condition of each workstation for each position.

6.7.1 The Potential Risk

The method is based on the definition of potential risk. It is define by the following formula:

Potential Risk = Probability x Consequence. The potential risk does not take methods of protection into account.

6.7.2 The residual risk

The residual risk is the risk remaining from the work situation after the means of protection have been applied. It is characterize by the formula:

Residual risk = Potential risk – Methods of Protection.


Once the methods of protection is define, it is sufficient to subtract the number obtained from the potential risk, as is described in the formula above.

Once the subtraction is done, we obtain the figure corresponding to the residual risk

6.7.3 The document

The risk assessment document has to be update at least each year. The update must be affected when significant modifications trigger consequences to risk level (modification of the work, change of products...) so the action plan also has to be regularly updated.

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The risk assessment document is a management tool and we must update it for the safety of our staff

7.0 CHECKING AND CORRECTIVE ACTION PLAN:

7.1 Measurement and Evaluation

The audit and feedback mechanisms are important to the HSE Management System. These mechanisms are used to confirm that the HSE Management System is being implemented and used correctly. They also measure performance, monitor effectiveness, and evaluate proposed changes to the system.

Measurement and evaluation tools include:


7.1.1 Audit – Auditing is the primary tool for measuring performance. The following audit protocols will be developed and implemented:

- Systems audit – to measure implementation and effectiveness of the HSE Management System,
- Compliance audit – to measure compliance with the HSE practices and procedures, and
- Performance audit – to measure whether the required performance level is being met.
- **HSE Process** – HSE professionals will be integrally involved in the process before and during project start-up. This involvement will identify key areas of the project that require particular attention and will help to adapt or create procedures that are tailored to the project. In addition, it will allow HSE personnel to become part of the project team and provide an opportunity to disseminate information on the HSE responsibilities of all project personnel.
- **Document Review** – The HSE Management System will be reviewed on an annual basis, unless otherwise determined by the Company HSE Unit / Top Management, to enable improvements and new initiatives to be formally included in the system.
- **Communication of the HSE Management System** – HSE management will communicate the HSE Management System to Mikano employees and other stakeholders through training, safety meetings, printed documents, and other forms of communication. These communications will facilitate the effective use of the HSE Management System and promote a high level of awareness regarding HSE issues. These communications will address overall HSE performance that will be included in the Annual HSE Report.
- **Performance Measurement** – A system of performance measurement shall be implemented to assess the overall effectiveness of the HSE Management System. This measurement system will include the setting and measuring of strategies and objectives, the collation of statistics, the recording of HSE initiatives, and skill base identification. In addition, a general awareness program provides feedback on HSE awareness to all employees.

7.2 Reporting

Mikano International Limited uses a mix of both indicators (near misses, first aid cases number, and road accidents, number of safety induction...) and (fatalities, LTI, MTC, LTIF, TRIR...) to measure overall HSE effectiveness and performance.

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To maintain this monitoring activity, Mikano International prepares three different reports:

- Accident/Incident Report
- Monthly report
- Annual report

7.2.1 Accident/Incident Report

All accident and incident reports are sent to the HSE unit for action, trending and analysis, and are discussed at the monthly HSE management review meetings.

Following an incident or near miss, details are input directly into the incident management system and sent to the HSE unit within 24 hours of the event.

7.2.2 Monthly Report

All monthly report must compile and send to management before the 10th of the subsequent month.

7.2.3 Annual Report

This is a compilation of all HSE results and activities performed during that year. It should be sent to the Management before January 15 of following year, so that the management can use the information for decision taking.

7.3 Action Plan

The Company HSE Action Plan is an integrated part of business planning and its schedule must always be harmonized with the Group Action Plan. (Planning of awareness's campaign, HSE audit)

7.3.1 Auditing and reviewing Auditing

The HSE audit schedule must be prepared in December for the following year and validated by senior management. The audit must be performed according to the Company procedure as follows:

- **Bi-monthly** - the HSE Officer must perform a safety audit in order to ensure personnel are fully aware of HSE behavior.
- **Three times a year** - the Top Manager must perform a general safety audit in order to demonstrate HSE commitment management and to use this opportunity to communicate and inform personnel about HSE risks.
- **Yearly** - the HSE department shall perform an HSE MS audit in order to monitor HSE performance. Any dysfunction and corrective actions required are reported to the Mikano International Executives to guarantee continuous improvement.


The corrective measures are validated and recorded by the respective departments, which are themselves committed to checking their efficiency.

The HSE Audit will be planned in order to maintain a high level of HSE management quality.

- **Phases**

- ✓ Preparation of the audit

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- ✓ Conduct of the audit
- ✓ Analysis of the audit
- ✓ Implementation of corrective actions

• **Operative modes**

- ✓ Preparation, conduct and analysis of the HSE department on site by the HSE officer or the group HSE unit
- ✓ Implementation of the improvement actions (responsibility of HSE officer and/or the Team Leader)

7.4 Permit to Work Audit

The success of the PTW system largely depends on the care and competence of the personnel responsible for authorizing the work, strict supervision and the professionalism in the way the work is undertaken.

8.0 MANAGEMENT REVIEW FOR IMPROVEMENT

8.1 Management Review:

The HSE Management System will be regularly review to accommodate factors such as changing expectations, new objectives, new legislation, organizational changes, and continual improvement.

8.1.1 A formal process shall be in place for top/senior management to review the effectiveness and suitability of the MS in managing HSE risks and ensuring continuous improvement in HSE performance.

The Review shall address but not be limited to:

- the findings of previous reviews;
- the need to change HSE policies and strategic objectives;
- the impact of significant organisational, location or activity changes;
- the HSE concerns of employees, contractors and external stakeholders;
- the provision of adequate resources and competent personnel to achieve HSE targets objectives and strategies;
- audit findings;
- Self-Appraisal Assessment (HSE-MS);
- verification of closure of corrective actions resulting from HSE reviews,
- audits, inspections and incident investigations and
- review of legal compliance.

Management Reviews of the MS shall take place on an annual basis.


Performance against annual HSE Plans and Department HSE Plans shall be reviewed regularly.

Results of Management reviews and identified remedial actions shall be documented and monitored until conclusion.

8.2. Improvements:

Continual improvement process: This process demonstrates continual improvement in a planned, implemented & maintained manner via incentive and recognition programs and consequence management. The required and actual outcomes of continual improvement are communicated to employees via monthly Performance review reports communicated.

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8.3 Consequence Management:

Enforcing our HSE policies should never be necessary as it is in every employees and contractor's best interest to follow its guidelines. However, discipline which is a means of altering employees' behaviour to conform to the accepted norms of the organization will be used as a tool to safeguard, maintain control and enforce HSE system standards/objectives. This process shall be in line with HSE policies, procedures, rules, standards and best practice and are outlined as follows:

- I. Written communication with an employee highlighting the fact that the employee is not meeting the established standards of performance or conduct. A warning letter should be given which valid for a year and where the employee still fails to comply a second issuance within this period is an automatic removal / termination or 1-week suspension base on the pedigree of violation committed

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