

**Lotte Chemical Pakistan Limited
Port Qasim**

PROCEDURE NO.	HSE&S Procedure No. 1.01-01	Page 1 of 10
TITLE	Organisation and Arrangements to Implement HSE&S Policies	
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Changes w.r.t revision of organizations & designations

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1. PURPOSE

The purpose of this procedure is to provide guidance in developing the Lotte Chemical Pakistan Limited (LCPL) HSE&S policy.

2. SCOPE

The policy herein applies to the LCPL, including Site and City Office. It supports the HSE&S Standards and Procedures that requires LCPL to have the arrangements and resources to implement the Health, Safety, Environment & Security, Policy and to conform with local laws.

3. DEFINITION

3.1 Site

In the context of this procedure, Site is taken to mean the LCPL Site, the Raw water Pumping Station, and the adjacent 50 Acre Plot.

4. POLICY STATEMENT

This is included as Appendix-2.

5. HEALTH, SAFETY, ENVIRONMENT & SECURITY, POLICY

5.1 Introduction

This Policy is issued in support of the HSE&S Policies of LCPL. It identifies responsibilities and describes the Organisation (Personnel and their duties) and Arrangements (Systems and Procedures) by which the Policy is to be implemented.

The Policy Statement shall be brought to the attention of all LCPL employees & Contractors. It shall have the date of the next review and be signed and dated by the Chief Executive.

The Policy shall be reviewed by the Chief Executive after three years or when required and controlled copies shall be updated following any revisions. All employees shall be informed of revisions through the normal management communication processes.

LCPL management sees the implementation of this policy as of primary importance to the well-being of its employees and the environment and fundamental to the success of the business. Compliance with the policy is a condition of employment for all employees.

5.2 Responsibilities

Appendix-1 details the LCPL Organisation Chart.

5.2.1 Prime Responsibility

The attainment of high and continually improving HSE&S standards is the prime responsibility of line management. It is considered to be their first priority and is used as an important measure of their performance assessment.

HSE&S matters are considered to be an integral part of the line management function and everyone supervising subordinates carries responsibility for the health and safety of those who respond to them, the public and the protection of the environment.

It is the responsibility of management to:

- Provide plant, machinery and equipment which is safe to use.
- Provide a workplace which is safe and will not affect the health of employees.
- Reduce adverse effects on the environment to a practicable minimum.
- Provide appropriate information, instruction and training for all employees.
- In meeting this responsibility management is required to:
 - Set demanding standards for individuals and for the LCPL as a whole.
 - Establish the means by which the standards are to be achieved.
 - Monitor performance against those standards.

Management believe that all accidents are preventable

5.2.2 General Responsibilities

The high standards for HSE&S call for continued commitment and intensive effort by all employees. Everyone has a duty to exercise personal responsibility in preventing harm to themselves and others and to the environment.

Management shall seek to achieve high standards by enlisting the full support of all employees through effective communication, consultation and training. The contribution of each employee to improved HSE&S performance will be valued as essential to the success of the business.

All employees have a responsibility to use their skills, knowledge and experience to improve safety and health in the workplace and environmental protection.

5.2.3 The Chief Executive shall be responsible for the implementation and monitoring of the relevant LCPL HSE&S policies and shall be

accountable for the HSE performance of the Business. He shall also be responsible for ensuring that there is full compliance with both statutory and Company requirements. He shall be responsible for issuing and ensuring that the LCPL HSE&S Policy is kept up to date and is understood by all employees.

5.2.4 The General Manager Manufacturing is accountable to the Chief Executive and is responsible for:

- The safe operation and maintenance of plant, machinery and equipment that minimises risks to health and the environment.
- The cleanliness and upkeep of structures, access, buildings and other facilities in a safe condition.
- The provision and maintenance of safe systems of work.
- The provision of appropriate information, instruction, training and supervision.
- Arrangements for the safe use, handling and storage of chemicals
- Prevention of harmful emissions to atmosphere and meeting local laws and standards.
- Safe disposal of liquid effluents, wastes and surplus substances.
- Ensuring that smoking will only be permitted in designated open "Smoking Areas".

5.2.5 Chief Financial Officer is accountable to the Chief Executive and responsible for:

- Ensuring relevant laws compliance in Finance and Legal functions.

5.2.6 The General Manager HR & IT is accountable to the Chief Executive and is responsible for:

- Establishing a Corporate Social Responsibility (CSR) Programme when appropriate to improve corporate social responsibility local to the Port Qasim Site. The programme will include a) a complaint and follow up procedure, b) general appearance of the Site, c) local information arrangements, d) emergency procedures.
- Making arrangements for ensuring that substance abuse is strictly prohibited at LCPL.
- Control of mobile phone use during driving as it is important aspect for safety of employees during travelling.

5.2.7 The Engineering Manager and Technical Manager are accountable to the General Manager Manufacturing and are responsible for ensuring that inspections of plant equipment as specified in LCPL Codes and Statutory Regulations are carried out. They also coordinates the activities of Waste Minimisation, Recycling Potential and Environmental Burden reduction.

5.2.8 The Production Manager, Engineering Manager and HSE & Technical Training Manager are accountable to the General Manager Manufacturing for the physical integrity and fitness for duty of the assets on the Site, and are also responsible for the regulatory compliance of Boiler, PNRA and Electricity Acts.

5.2.9 The HR & IT Manager, Administration Manager, Manager General Affairs and General Affairs & Security Manager are accountable to the General Manager HR & IT , HR & Training Manager is accountable to HR & IT Manager ,and responsible for:

- Provision of medical facilities, pre-employment, routine and specialist medical examinations and annual health screening of employees.
- Site security in compliance with HSE&S Procedure No. 9.01-01 / 9.02-01.
- Maintenance of all employee training records.
- Ensuring high standards of safety and hygiene in the provision of food from the canteens.
- Provision of vehicles and drivers of high safety standard to minimise risks to employees.
- Cleanliness and general management of the main offices and canteen buildings including fumigation and potable water monitoring.
- The compliance of Factories Act and Motor Vehicle Ordinance [and all applicable laws](#).
- Communication and implementation of Mobile Phone and Driving Policy.
- Ensuring relevant laws compliance in IT fuction (where applicable).

5.2.10 The Occupational Health function shall be coordinated by the General Manager HR & IT through the Occupational Health Physician, and shall support LCPL activities by:

- Preventing adverse effects on the health of employees, customers and the general public that may arise out of the Business activities.
- [Encourage safe working practices](#)
- Managing adverse health effects that may occur.
- Complying and monitoring relevant legal requirements.
- Providing competent and independent professional advice to management and employees on occupational health matters.
- Providing general health care resources in accordance with the requirements developed by the management.
- Promoting good health [awareness](#)
- Cooperating with government, regulatory, professional bodies and local communities on matters relating to [occupational health](#)
- Implimentation of Occupational Health Monitoring.

- Making arrangements for training and participation of Occupational Health Provider in relevant risk assessments.
- [In the pandemic situation, the role of Occupational Health Physician has been strategic in ensuring the best health conditions at the workplace.](#)

5.2.11 The General Manager HR & IT shall ensure that Occupational Health Physician and his staff follow basic ethical principles in their interaction between management and employees which are given below:

- In medical examination e.g. pre-employment, fitness to drive etc., the physician shall report conclusions only to management, the clinical findings not being revealed without the informed consent of the individual examined. The fit or unfit status to be communicated to the Manager General Affairs.
- [To keep confidentiality of employees clinical records.](#)
- Routine Doctor – Patient relationship: Clinical information shall not be revealed to management without the patients consent. Where such information has to be necessarily provided for the patients benefit, consent shall be obtained.
- Occasionally employees health condition can affect the safety of others. Efforts shall be made to gain the patients consent for disclosure of such information to the management, failing which, a decision shall be taken on the merit of the situation.
- Approval for any research involving people shall be obtained from General Manager HR & IT.

5.2.12 The Commercial Manager is accountable to the Chief Executive and is responsible for the compliance with the LCPL HSE&S standards and procedures which relate to the following activities:

- Distribution, including imports of raw materials, exports of finished products and warehousing and storage activities.
- Product Safety, including provision of HSE information to Customers and inspection of Customer premises.
- HSE aspects of Purchasing and Supply.
- Aspect related to Product Stewardship for communication and implementation as the Product Stewardship is an integral part of the process for identifying, managing and reducing the HSE&S risks through all stages of our products life cycle.

5.2.13 The Production Manager, Engineering Manager & Technical Manager, HSE & Technical Training Manager and their management teams are accountable to the General Manager Manufacturing for the effective, practical application of this policy within their own activities.

5.2.14 Plant Managers are accountable to Production Manager and responsible for individual plant operations. Plant Manager Utilities is also responsible for compliance of Petroleum Act and Boilers Act.

5.2.15 Senior Shift Managers (SSMs) are accountable to Plant Manager Oxidation and are responsible for:

- Strict compliance of LCPL's HSE Policies, Standards & legislative requirements
- Compliance of Permit to Work System including hot jobs and vessel entries to ensure plant safety standards are met during the shift.
- Conducting Job Cycle Audits (JCA) / Housekeeping audits of various plant areas as per plan.
- Take immediate actions on SUSA observations shared by SUSA auditors on Oxidation plant and ensure mitigation actions are taken on Purification, Utilities & Co-Gen Plant to ensure strict adherence of HSE requirements.

5.2.16 Shift Managers (SMs) are accountable to respective Plant Managers and are responsible for:

- Strict compliance of LCPL's HSE Policies, Standards legislative requirements
- Compliance of Permit to Work System (including hot jobs) in the areas of responsibility to ensure plant safety standards are met during the shift.
- Conducting Job Cycle Audits (JCA) / Housekeeping audit of various plant areas as per plan to ensure strict adherence of HSE requirements.

5.2.17 Non Management Staff (Workers) are responsible for:

- To comply with company policies, health, safety & environment standards, ISO 14001, 45001 & 9001 quality procedures and legislative requirements.
- To operate assigned area safely and efficiently as per defined procedures and operating instructions to meet production, efficiency and quality targets. Job holder should also perform plant routine activities planned in shifts.
- To monitor plant conditions and fill relevant check / log sheets as per defined time interval, inform any problem or abnormality to concerned manager.
- All Non-Management employees need to participate in health & safety training sessions and refresher trainings.
- All workers must monitor themselves for sign and symptoms of the disease and report to their supervisor and company

physician immediately in case if they are experiencing any pandemic disease (e.g. Covid-19 etc) symptoms.

5.2.18 The HSE & Technical Training Manager is accountable to the General Manager Manufacturing for promoting, advising and reporting on HSE matters in support of this policy. He provides a professional advisory and support service to assist line management in the discharge of their responsibilities. As part of this process he is responsible for:

- Managing the HSE&S Procedure System.
- Monitoring and auditing activities associated with this Policy and the HSE&S Procedure System.
- Keeping up to date with all HSE related Pakistan legislation in the area of Fire Safety, Environment and Radiation Protection.
- Maintaining safety statistics and monitoring trends to assist in the preparation of improvement plans.
- Implementation of new HSE initiatives including publicity.
- Ensuring new employees receive induction safety training.
- Operation of Emergency Medical Treatment System.
- Provision and operation of the Fire Service.

5.2.19 The Process Engineering & Development Manager is accountable to the Technical Manager and is responsible for Environmental compliance testing.

5.2.20 The Site Toxicologist is accountable to the Technical Manager and is responsible for all aspects of toxicology.

5.2.21 Commercial Manager is Product Steward for the Business.

5.3 Arrangements

The following arrangements exist for making the policy effective.

5.3.1 Site HSE&S Procedures

Detailed arrangements for the implementation of LCPL HSE Standards are specified in the Site HSE&S Procedures. These Procedures are controlled documents and numbered copies are with relevant members of the management and at Raw Water Pumping station. These Site Procedures are mandatory and are seen as a cornerstone of the LCPL HSE&S Policy. They apply to all activities in the LCPL.

5.3.2 Training

All Managers and Supervisors are responsible for identifying and meeting training needs for their activities. This includes planning, validating and recording system for all training. A HSE induction training is available for employees and contractors. HSE & Technical

Training Manager is responsible for facilitating as well as organising assigned training events.

5.3.3 Auditing

Operational, Specialist and Management audits are carried out as per LCPL requirements and or as per Business requirements.

5.3.4 HSE&S Improvement Plans

A detailed HSE&S Improvement Plan for the LCPL is based upon the requirement to implement Standards together with locally agreed issues.

5.3.5 The Chief Executive shall be responsible for constituting the LCPL Business HSE&S Committee and advising frequency of it's meetings.

5.3.6 Consultation

Formal consultation with employees will be by way of both direct and cascade communication. However, great importance is attached to the resolution of HSE&S problems as close to the workplace as possible. Day to day problems are dealt with by appropriate employees and managers concerned, with assistance from the HSE Department as necessary. Regular discussions are held with employees as part of the formal Communications procedure and HSE matters are priority items at these meetings. Management are committed to full involvement of all employees where appropriate, on HSE issues.

5.3.7 Accident Reporting and Investigation

A system is in operation for the formal reporting of Learning Events or accidents both injury and non-injury, occupational diseases and environmental incidents using HSE Database. Investigations are carried out to determine root causes so that action may be taken to prevent recurrence. The implementation of recommended actions is regularly monitored. Statistics are compiled, analysed and reported as appropriate.

5.3.8 Plant and Equipment

Capital projects, modifications and maintenance of Plant and Equipment shall take into account all relevant Engineering Procedures adopted by the business.

5.3.9 Control of Hazardous Substances

LCPL is an Asbestos Free site. Hazard data including hygiene standards is available for all existing hazardous substances. No new substance may be introduced onto the Site until hazard data is available. Management is required to assess, evaluate risks and implement the necessary control measures to ensure the health and safety of employees. A programme of personal monitoring is in place to monitor the effectiveness of the control measures. Information and training is given to all employees concerned.

5.3.10 Sustainability

LCPL is committed to conduct its business responsibly, with integrity, and with due respect to the interests of all those affected by our operations. LCPL believes that its activities generate economic benefits; create opportunities for enhanced quality of life; respect the environment; and are a positive influence in the communities in which we operate.

5.3.11 Legal Compliance

LCPL is committed to ensure legal compliance specifically with respect to HSE&S.

6. COMMUNICATIONS AND TRAINING

- 6.1 This policy shall be communicated to all employees of LCPL.
- 6.2 Copies of the Policy shall be maintained in various work area in the Site LCPL HSE&S Management System”Green Book” Manual and be available to all employees.
- 6.3 All new employees shall be made aware of the Policies during their induction training.

7. DOCUMENTATION

Appendix-1 Organization Chart with HSE&S Responsibilities

Appendix-2 HSE&S Policy

8. AMENDMENTS

This is the [eleventh](#) revision.