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HEALTH AND SAFETY MANAGEMENT SYSTEM MANUAL TNCL-OHS-MAN-0001



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1. INTRODUCTION

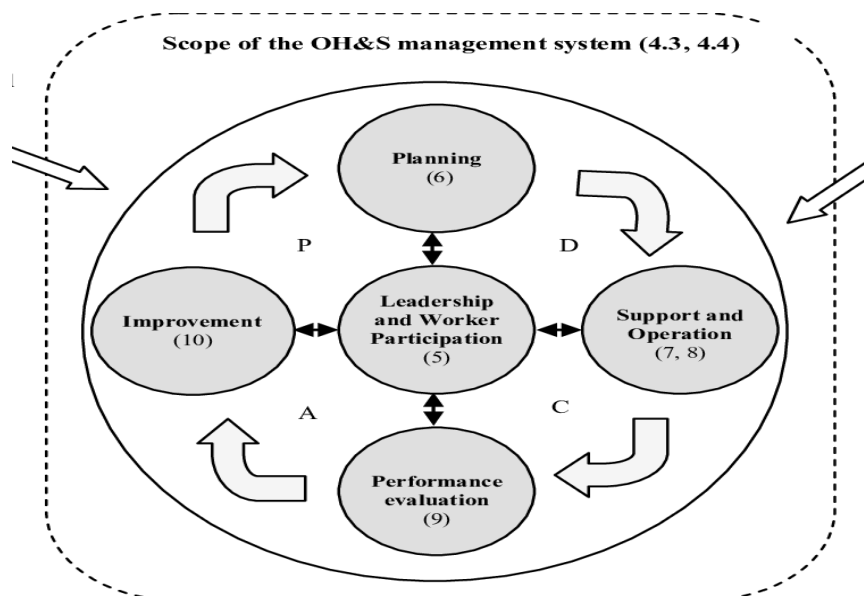
TNCL has designed and executed an Occupational Health & Safety Management System that conforms to the ISO 45001:2018 standard. This system serves as a framework for our organisation to document and enhance our operational practices, making them more efficient in meeting the requirements and expectations of our workers, suppliers, stakeholders, and interested parties.


This manual is designed to introduce our employees, stakeholders, and interested individuals to the measures that have been put in place to ensure that our management system is maintained with integrity and focused on achieving its intended results.

This manual explains the structure and interactions of our management system, as well as the authorities, responsibilities and interrelationships of the personnel who work within our organisation's occupational health and safety (OHS) boundaries. It also references the procedures, processes and activities that make up the OHS system.

The Figure below illustrates our methodology for developing an Occupational Health and Safety Management System. We use the Plan-Do-Check-Act cycle to implement the process approach, delivering management system objectives, stakeholder requirements, and worker safety.

Figure 1: OHS Management System Process Modal



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1.1. TNCL Core Values

TNCL collaborates with shareholders to achieve their goals and develop efficient performance. Our core values include:

- Safety
- Respect
- Honest
- Integrity

2. REFERENCE

ISO 45001:2018, Occupational Health and Safety Management Systems — there are no normative references in this document.


3. TERMS AND DEFINITION

For this OHS Management System Manual, the definitions given in ISO 45001:2018 standards apply.

4. DEFINITION AND ABBREVIATIONS

Table 1: Definitions and Abbreviations

Terms / Abbreviation	Definition / Meaning
CEO	Chief Executive Officer
CET	Control Effectiveness Test
COO	Chief Operating Officer
FRM	Form
GM	General Manager
ILO	International Labour Organisation
ISO	International Standardization
MFG	Maximum Foreseeable Gain
MFL	Maximum Foreseeable Loss

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MMI	Maximum Medical Improvement
OEL	Limit value set by the Minister, which represents the airborne concentration of a hazardous chemical agent, where the exposure the standard may be— (a) an eight-hour time-weighted average. (b) a ceiling limit or (c) a short-term exposure limit;
OHS	Occupational Health and Safety
OHS-MS	Occupational Health and Safety Management System
OREP	Occupational Risk Exposure Program
PESTLE	Political, Economic, Sociological, Technological, Legal and Environmental
RGT	Register
RPN	Risk Potential Number
RRR	Residual Risk Rating
SDS	Safety Data Sheet
SOP	Standard Operating Procedure
SWOT	Strength, Weakness, Opportunity, Threat
TLV	Threshold Limit Values
TNCL	Tembo Nickel Corporation Limited
Top Management	The person or group of people who has the power to delegate authority and provide resources within the organisation. This manual refers to the site GM, COO, and CEO.
Worker	The person performing work or work-related activities that are under the control of the organisation.

4.1. Context Of Our Organisation

TNCL is dedicated to determining our position in the market and understanding how various factors, such as legal, political, economic, social, and technological issues, impact our strategic direction and organizational context. To ensure we meet the needs of our workers and stakeholders, as well as maintain stable processes and a strong management system, TNCL identifies, analyzes, monitors, and reviews factors that could potentially affect our operations and integrity.

To align our management system with our strategy, we analyze internal and external factors to determine potential impacts on our context and business strategy.


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Table 2: Internal and External Influences


Type of Internal influence	Types of external influence
Culture	Insurance
Directors	Stakeholders
Knowledge	Community
Shareholders	Legislators
Suppliers / Contractors	Customers
Workers, Workers Rep	Regulators

Such issues include factors that are affected by our organisation or can affect our organisation. Broadly, these issues are defined as:

- 1. Internal issues** – Our organisation's activities, products, services, strategic direction, culture, people, knowledge, processes, and systems can be affected by various conditions. We use SWOT analysis as a framework to review and evaluate our strategies, assess the position and direction of our organisation, evaluate business propositions, and assess other ideas.
- 2. External issues** – Our organisation uses PESTLE analysis to measure market potential by evaluating cultural, social, political, legal, regulatory, financial, technological, economic, and competition at local, national, and international levels.

TNCL ensures a continual understanding of each group's requirements by monitoring and reviewing information. To understand our context, we consider issues that influence it during review meetings using the Context & Interested Parties analysis template. We document the results via minutes and business planning documents. We also maintain additional documented information, besides this document, to describe our organizational context and decisions related to it.

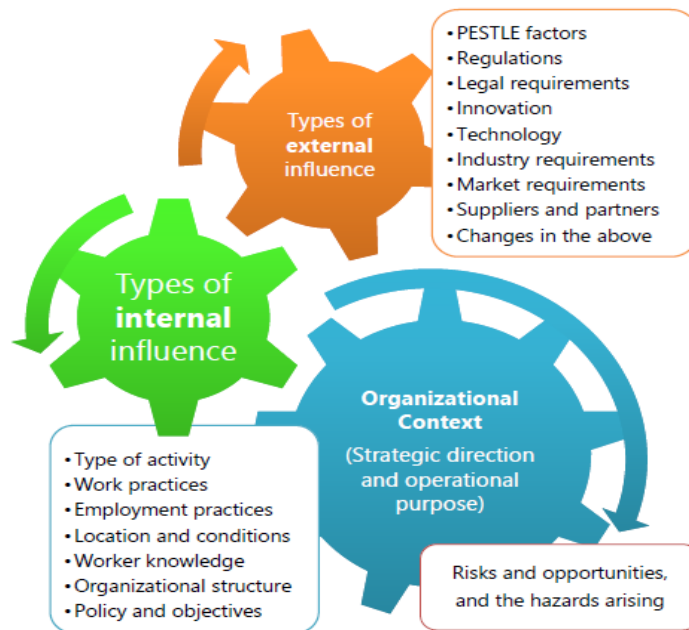
1. Context & Interested Parties Analysis underpins our **policies** and drives our **future goals**.
2. SWOT Analysis to help understand **internal issues**.
3. PESTLE Analysis to help understand **external issues**.


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The results obtained from these activities serve as inputs when determining the scope of our management (4.3) and its processes (4.4). They are also considered when assessing the risks and opportunities that may affect Occupational Health and Safety (OHS). The information gathered is used to take appropriate actions to address any identified risks and opportunities (6.1).

The SWOT analysis gives our organisation a framework to assess and evaluate our strategies, business propositions, and other ideas. It also helps us determine the position and direction of our organization. Similarly, the PESTLE analysis provides us with a framework to measure the market and growth potential according to external factors such as political, economic, social, technological, legal, and environmental aspects.

Figure 2: Internal and External Influences



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4.2. Requirement of Workers and Other Interested Parties

TNCL identifies and classifies its interested parties based on the information and knowledge available within our business. We allocate each interested party to one or more categories and then analyze them to determine whether they have any relevant needs or expectations that could impact our business activities or the OHS.

To prioritize the interested parties and their requirements, we use the Context & Interested Parties analysis template, which ranks and scores them based on simple, subjective criteria. This ranking generates a Risk Potential Number (RPN) by multiplying the perceived power score by the priority score by the relevance score.

Once we have prioritized the relevant needs or expectations, we convert them into requirements. These requirements become inputs for OHS planning and/or service designs. The outputs generated from this process are typically used to inform the following sections and processes of the OHS.

1. OHS Management System Scope - 4.3
2. OHS Management System Process - 4.4
3. Risk and opportunities - 6.1.1
4. Hazard Identification, Risk Assessment & Opportunities - 6.1.2
5. Legal requirements and other Requirements - 6.1.3
6. Planning Action - 6.1.4
7. Communication - 7.4
8. Operations - 8.0.

TNCL acknowledges that its interested parties have evolving needs and expectations and that only a subset of these apply to its operations.

Reference:

TNCL-OHS-REG-0024, Internal and External Issues

TNCL-OHS-REG-0025, Needs and Expectations



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Figure 3: Types of Interested Parties



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4.3. Health and Safety Management System Scope

TNCL has established the scope of its Occupational Health and Safety (OHS) management system based on the activities described in Section 1.0 and the analysis of the issues and requirements identified in Sections 4.1 and 4.2. This helps to implement objectives and policies that are relevant to TNCL's context, physical and organizational boundaries, product life cycles, and interested parties.

TNCL has different levels of control and influence over its products and services performed at its facilities. The functional and organisational boundaries for different physical locations (where applicable) and the level of control and influence are summarised below:

- Human Resources
- OHS
- Engineering
- Maintenance & Construction
- Geology
- Environment
- Community Relations
- Finance and Administration
- Supply Chain Management (Procurement, Logistics, Stores)
- Security

These organisation units/functions help TNCL manage its operations effectively.

TNCL has determined the scope of the OHS management system (OHS) as follows:

“Nickel Exploration, Mining, and Processing Activities” from its project site TNCL Ngara, Kagera and Buzwagi Kahama - United Republic of Tanzania.


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Table 3: Organisational Boundaries

Physical Boundary	Functional Boundary	Organisation Boundary	Authority to Control or Influence
TNCL, Ngara, Kagera, & Buzwagi Kahama in the United Republic of Tanzania	All activities performed and managed by our organisation that result in product or service outputs.	Complete organisational control over current activities	TNCL have a high degree of authority to control or influence related processes
No external 3rd parties performed our process.	Undertaking process as per our specifications	Purchasing and contractual controls	3rd Parties shall be controlled and influenced through contractual mechanisms


Our management system needs to be strong and comprehensive so that all activities, products, and services offered by TNCL are included in the scope of the OHS. This helps us control and influence our operations.

The document's scope explains our OHS and outlines the authorities, relationships, and responsibilities of process owners and staff operating within the management system. It also details the sequence and interaction of our processes. Our conformity to ISO 45001:2018 has been verified through a formal assessment and review process conducted by the business registration authority.

Although we understand that ISO 45001:2018 does not require a formal manual, TNCL has decided to keep and update our OHS-MS manual as our employees, suppliers, and other stakeholders believe it adds value to our operations.

4.4. OHS Management System Processes

TNCL has implemented an Occupational Health and Safety (OHS) management system as part of a larger strategy that complies with ISO 45001:2018. The process approach advocated by the above management system standards has been adopted by TNCL. The top management has identified the processes required to achieve the intended outputs. The Process Matrix & Application template is used to record and assign requirements to relevant functions, processes, departments, and teams. This information forms the basis for programming process audits.

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Our organization has defined three key process groups, and we manage their inputs, activities, controls, outputs, and interfaces to ensure system effectiveness is established and maintained. These process groups are described using tools such as procedures, process maps, turtle diagrams, matrices, schedules, charts, etc. Refer to Figure A1 in this manual for the sequence of our processes and the interaction of the processes within our OHS.

We monitor key performance indicators (KPIs) linked to our objectives to measure and communicate process performance. This approach allows top management to review management system performance regularly and ensure its ongoing integration with business processes.


We use trends and statistical data related to non-conformities, OH&S-related aspects, targets, objectives, and corrective actions, as well as monitoring and measurement results, audit results, process performance data, and compliance data, as part of the decision-making process to ensure objective management decisions can be made.

If TNCL identifies the requirement to outsource another process or part thereof, that affects conformity with the stated requirements, we identify control criteria such as the competence of workers and suppliers, inspection regimes, the provision of product conformity certificates, adherence to specifications, specific job files, etc.

5. LEADERSHIP & WORKERS PARTICIPATION

5.1. Leadership and Commitment

The top management of our organization is proactively involved in implementing and maintaining our health and safety management system. Effective safety management is crucial for driving towards a positive safety culture by increasing the visibility of top management's support and improving the active involvement of personnel in managing safety risks.

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A positive safety culture empowers effective safety management, and vice versa. To encourage front-line leaders to feel a sense of shared responsibility towards achieving our safety objectives, the upper and middle management visibly supports our organization's positive safety culture. Top management provides accountability and governance to all activities related to the lifecycle of our processes and products. This includes defining the appropriate responsibilities, authorities, and methods of communication to ensure safe and effective performance.

Top management ensures that all necessary resources, responsibilities, and accountabilities are allocated for the continual improvement of the health and safety management system. You can refer to Appendix A.2 for a copy of our current Organization Chart.

The OHS Manager, appointed by top management, ensures that the necessary financial, technological, and organizational resources, including the services of specialists and competent Health & Safety personnel, are available to implement, monitor, maintain, and report upon the status of the health and safety management system.

The Standard Committee, which comprises various organizational levels, functions, and work areas, is established to support active occupational health and safety management. The Standard Committee oversees the implementation of improvement plans and the development of safety objectives. It reports to top management and the OHS Manager.

Regular reviews and data reporting ensure that our health and safety management system is effective and can react to emerging issues. Top management is committed to implementing and developing the management system, and this commitment is defined by our corporate policies and objectives. You can find top management's involvement and commitment in our corporate policies and objectives.

Reference:

TNCL-OHS-SOP-0010 - Standard Committee Procedure

TNCL-OHS-SOP-0011 - SHE Committee Procedure

TNCL-OHS-SOP-0006 - Consultation & Participation Procedure



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Figure 4: Leadership PDCA Cycle




TNCL's top management has demonstrated leadership and commitment concerning the OHS management system by:

- a. Taking responsibility for the effectiveness of the Occupational Health and Safety (OHS) management system.
- b. Taking overall accountability for preventing work-related injuries and illnesses, as well as providing safe and healthy workplaces and activities.
- c. Ensuring that the OHS policy and objectives are established for the OHS management system and are compatible with the context and strategic direction of TNCL.
- d. Ensuring that the OHS requirements are integrated into the organisation's business processes.
- e. Promoting the use of process approach and risk-based thinking.
- f. Ensuring that the resources required for the OHS management system are available.
- g. Communicating the significance of effective OHS management and conforming to the OHS management system requirements.

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- h. Ensuring that the OHS management system achieves its intended results.
- i. Engaging, directing, and supporting individuals to contribute to the effectiveness of the OHS management system.
- j. Ensuring and promoting continuous improvement.
- k. Supporting other relevant management roles to demonstrate their leadership in their areas of responsibility.
- l. Developing, leading, and promoting a culture in the organization that supports the intended outcomes of the OHS management system.
- m. Protecting employees from retaliation when reporting incidents, hazards, risks, and opportunities.
- n. Ensuring that the organization establishes and implements a process for consulting and involving employees.
- o. Supporting the establishment and functioning of health and safety committees.

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Reference:

TNCL-OHS-POL-0001, Occupational Health and Safety Policy Statement

5.2. Health and Safety Policy


5.2.1. Establishing Our OHS Management Policy

TNCL's top management has established, implemented, and maintained an OHS management policy that is within the defined scope of its OHS management system.

- a. Is appropriate to the purpose and context of the organisation and supports its strategic direction, including the nature, scale, and OHS risks,
- b. Provides a framework for setting OHS objectives.
- c. Includes a commitment to the prevention of injury and ill health and other specific commitments relevant to the context of TNCL.
- d. Includes a commitment to satisfy applicable requirements.
- e. Includes a commitment to fulfil its compliance obligations and comply with other requirements to which the organisation subscribes that relate to its OH&S hazards,
- f. It is documented, implemented, and maintained.
- g. It is communicated to all persons working under the control of the station with the intent of making them aware of their individual OHS obligations.
- h. Is available to interested parties and
- i. This includes a commitment to the continual improvement of the OHS management system.
- j. It is reviewed periodically to ensure that it remains relevant and appropriate to the organisation.

Reference:

TNCL-OHS-POL-0001, Occupational Health and Safety Policy Statement

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5.2.2. Communicating Our OHS Policy

TNCL OHS Management policies are available and maintained as documented information.

- a. Communicated, understood, and applied within the organisation.
- b. Available to relevant interested parties, as appropriate.
- c. Relevant and appropriate.


5.3. Organisational Roles, Responsibilities, and Authorities

Top management shall take ultimate responsibility for the OHS management system. The top management has demonstrated its commitment by:

- a. Ensuring the availability of resources is essential to establishing, implementing, maintaining, and improving the OHS management system.
- b. Defining roles, allocating responsibilities and accountabilities, and delegating authorities to facilitate effective OHS management; roles, responsibilities, accountabilities, and authorities shall be documented and communicated.

TNCL's top management has ensured that the responsibilities and authorities for relevant roles are assigned, communicated, and understood within the organisation. TNCL's top management has assigned the responsibility and authority to appoint a member of top management with specific responsibility for OHS, irrespective of other responsibilities, and with defined roles and authority for:

- a. Ensuring that the OHS management system is established, implemented, and maintained following these OHS standards.
- b. Ensuring that the processes are delivering their intended outputs.
- c. Report on the performance of the OHS management system and opportunities for improvement, particularly to top management.
- d. Ensuring that the integrity of the OHS management system is maintained when changes to the OHS management system are planned and implemented.

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The identity of the top management appointee has been made available to all persons working under the control of TNCL.

All those with management responsibility have demonstrated their commitment to the continual improvement of OHS performance. The organisation has ensured that persons in the workplace take responsibility for aspects of OHS over which they have control, including adherence to TNCL's applicable OHS requirements.

Reference:

Organisation chart (Appendices A2)

Job descriptions

Appointments

5.4. Top Management


TNCL's top management ensures that the responsibilities and authorities for relevant roles within the OHS management system are assigned and communicated at all levels within the organisation, and the information is maintained as documented.

The top management has assigned the responsibility and authority to:

- a. Ensure that the OHS management system conforms to the requirements of ISO 45001:2018 and the self-regulatory OHS management system.
- b. Reporting on the performance of the OHS management system to the top management.

5.4.1. OHS Manager

The OHS Manager holds the responsibility of overseeing the Occupational Health and Safety management system in the workplace. This involves monitoring occupational health and safety risks and hazards, providing advice to employees on how to minimize or avoid such risks and hazards, and ensuring that all workers are protected from anything that may cause harm. The OHS Manager must also effectively control any risks to injury or health that could arise in the workplace, while also ensuring that the budget is allocated for the implementation of all occupational health and safety activities.

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5.4.2. Health, Safety Leads

Occupational Health and Safety Leads bear the responsibility of managing the Occupational Health and Safety Management System. They monitor health and safety risks and hazards in the workplace, provide advice to employees on how to minimize or avoid them, and ensure that workers are protected from anything that may cause harm. Their primary objective is to effectively control any risks to injury or health that could arise in the workplace.


5.4.3. Safety Officers / Specialists

Safety Officers and specialists are responsible for implementing, monitoring, maintaining and reporting on the status of the health and safety management system. They also ensure that workers receive proper training and have the necessary competencies. The Health and Safety officers are responsible for planning, implementing and overseeing the company's compliance and adherence to Occupational health and safety guidelines.

5.4.4. Health and Safety Representatives

TNCL's top management has appointed the OHS Health and Safety Representatives as per the Occupational Health and Safety Act of 2003; in terms of this appointment, the OHS representative shall be responsible for all activities and duties designated, including:

- a. Identification of potential hazards and major incidents in the workplace
- b. Report accidents, near misses, injuries, illnesses, and non-compliance
- c. Participate in any internal health or safety audit.
- d. Investigate complaints by any employee relating to that employee's health or safety at work.
- e. Participate in incident investigations.
- f. Conduct toolbox and monthly safety meetings.
- g. Recommend ideas for improving health and safety in the respective workplace.
- h. Set an example by working safely and responsibly.
- i. Observe how safety and health are enforced in the workplace.
- j. Ensure assignments are completed as recommended by the Safety Committee.
- k. Represent employee safety interests.
- l. Safety inspections in the workplace and on the fire extinguishers in the work areas.
- m. Ensure fellow employees perform a risk assessment before the commencement of activities.
- n. Review policy/procedures when required.
- o. Ensure company rules/procedures are always adhered to.

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Reference:

TNCL-OHS-SOP-0011, SHE Committee Procedure

TNCL-OHS-APP-0001, SHE Reps Appointment

5.4.5. Standard Committee

TNCL Top Management has implemented the Standard Committee, and the purpose of this committee is to ensure TNCL's standards, Procedures, Policies, and rules are friendly and practicable. The committee also specifies how TNCL will effectively and consistently manage and structure its governance documentation, which must lead to the reduction and prevention of injuries and risks to employees.

Reference:

TNCL-OHS-SOP-0010, Standard Committee Procedure


5.4.6. Managers and Supervisors

Managers and supervisors play major roles in workplace OHS responsibilities,

- a. Making decisions about health and safety that may affect work activities or other workers.
- b. Ensuring legal requirements and others regarding health and safety are met.
- c. Actioning safety reports and carrying out workplace inspections.
- d. Ensuring safe work method statements are completed.
- e. Ensuring safe work practices

Reference:

TNCL-OHS-APP-0001, Managers Appointment Letter

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5.4.7. Workers and Contractors

Workers and contractors are required to be involved and participate in the input and operation of the Occupational Health and Safety Management System. TNCL ensures that the work or work-related activities performed under the control of the organisation may be performed by workers employed by TNCL, workers of external providers, contractors, individuals, agency workers, and other persons to the extent the company shares control over their work or work-related activities, according to the context of the organisation.

5.4.8. Consultation and Participation of Workers

TNCL has established, implemented, and maintained a process for consultation and participation of workers at all applicable levels and functions, workers' representatives, in the development, planning, implementation, performance evaluation, and actions for improvement of the OHS management system. TNCL has:

- a. Provided mechanisms, time, training, and resources necessary for consultation and participation.
- b. Provided timely access to clear, understandable, and relevant information about the OHS management system.
- c. Determined and removed obstacles or barriers to participation and minimized those that cannot be removed.
- d. Emphasized the consultation of non-managerial workers on the following:
 - i. Determining the needs and expectations of interested parties.
 - ii. Establishing the OH&S policy.
 - iii. Assigning organisational roles, responsibilities, and authorities, as applicable.
 - iv. Determining how to fulfil legal requirements and other requirements.
 - v. Establishing OH&S objectives and planning to achieve them.
 - vi. Determining applicable controls for outsourcing, procurement, and contractors
 - vii. Determining what needs to be monitored, measured, and evaluated.
 - viii. Planning, establishing, implementing, and maintaining an audit program.
 - ix. Ensuring continual improvement.

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- e. Emphasized the participation of non-managerial workers in the following:
- i. Determining the mechanisms for their consultation and participation.
 - ii. Identifying hazards and assessing risks and opportunities.
 - iii. Determining actions to eliminate hazards and reduce OH&S risks.
 - iv. Determining competence requirements, training needs, training, and evaluating training.
 - v. Determining what needs to be communicated and how this will be done.
 - vi. Determining control measures and their effective implementation and use.
 - vii. Investigating incidents and nonconformities and determining corrective actions


Reference: TNCL-OHS-SOP-0006, Consultation & Participation Procedure

5.4.9. Safety Bulleting

TNCL has established communication alerts for major faults that would result in a serious or fatal injury, and where remedial action is required, a Safety bulletin is issued when there is a specific safety issue that, without being taken, could result in a serious or fatal injury.

5.4.10. Safety Flash

TNCL established, implemented, and maintained a system for incident reporting and analysis as an important tool for sharing vital information among the TNCL. This report is intended to provide initial notification that an incident or high-potential event has occurred. Safety Flash helps members around the TNCL portfolio. Safety Flash helps members around the TNCL portfolio identify potential hazards, share a lesson learned, and avoid repetition.

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5.4.11. Health and Safety Committee

TNCL ensures that the Safety committee brings together workers and employers through regularly scheduled meetings where safety issues are discussed; the goal of the safety committee is to create and encourage a culture of safety at TNCL. The following is a list of some roles of a health and safety committee.


- a. The Safety Committee shall meet as often as necessary but at least once every three months. The minutes of the meeting shall be recorded.
- b. The Safety Committee shall have the right to be adequately and suitably informed.
- c. The functions and duties of the safety committee shall include the following:
 - I. Dealing with all matters concerning health, safety, and environment, and arriving at practical solutions to problems encountered.
 - II. Creating safety awareness among all the workers.
 - III. Undertaking educational, training, and promotional activities.
 - IV. Discuss reports on safety, environmental, and occupational health surveys, safety audits, risk assessments, emergency and disaster management plans, and implementation of the recommendations made in the reports.
 - V. Carrying out health and safety surveys and identifying the cause of accidents.
 - VI. Looking into any complaint made on the likelihood of imminent danger to the safety and health of the workers and suggesting corrective measures and
 - VII. Reviewing the implementation of its recommendations.
 - VIII. Incident investigation results & review of the effectiveness of the action taken.
 - IX. The safety Manager is accountable for conducting safety committee meetings.

Reference:

TNCL-OHS-SOP-0011, SHE Committee Procedure

5.4.12. Safety Mass Meeting

TNCL ensures that employees and contractors come together once a week with the top management team, whereby occupational health and safety issues are discussed; the goal of weekly safety meetings is to raise awareness of safety-related matters and encourage a culture of safety at TNCL.

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5.4.13. Weekly HSE Meeting

TNCL's top Management ensures that employees, contractors, OHS representatives, and members of the worker's forum and top management come to meet every week, where occupational health, safety, and environmental issues are discussed; the goal of this meeting is to review OHS issues raised during and discuss challenges hindering the progress of OHS management system implementation and other safety and workers welfare related matters at TNCL.

5.4.14. External Regulatory Parties

TNCL has determined the other interested parties, in addition to workers, that are relevant to the OHS management system; TNCL has also determined the relevant needs and expectations of workers and other interested parties. TNCL has also identified the needs and expectations, which are legal requirements and other requirements.

Reference:

TNCL-OHS-REG-0024, Internal and External Issues


TNCL-OHS-REG-0025, Needs and Expectations

6. PLANNING

6.1. Actions to Address

TNCL takes into account the risks and opportunities associated with business planning (4.1), workers, and interested parties (4.2). Our management system and its processes (4.3), along with our operations and supply chain (8.1), are designed to ensure that our health and safety management system meets its intended outcomes, reduces undesired effects, and achieves continuous improvement.

To help all TNCL employees or contractors assess risks associated with physical hazards when it is difficult to quantify levels of exposure or risk, we have a basic risk assessment. Additionally, we have a detailed risk assessment that considers the probability and exposure to physical hazards.

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Risk Process

Identify risk.

- a. Identify threats and opportunities by considering them.
 - What can go wrong and what must go right.
 - Five-year plan, the life of asset planning, and other deliverables from our requirements for corporate alignment planning.
 - Purpose statement from TNCL requirement for organization design
 - Internal and external sources of risk
 - Intended and unintended when introducing change.
- b. Prioritize the assessment and treatment of any risks that can impact the achievement of strategic and operational business objectives.

Assess risk.

- a. For each identifies risk
 - Classify risk as a current risk or an emerging risk.
 - Use one or more recommended techniques in the Risk Frame to perform a risk assessment.
 - Use the TNCL Severity and Likelihood table (Table 4) to determine the Maximum Foreseeable Loss (MFL) and for each risk or risk scenario with an MFL impact level to determine the Residual Risk Rating (RRR)
 - Determine maximum foreseeable gain (MFG) for an opportunity.
 - Review and, when applicable, update the risk assessment following any risk-relevant change.
 - Ensure people with relevant expertise and experience are involved in all risk assessments.
- b. For each current risk, classify it as a current material risk if it has an MFL \geq level 4 impact.


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c. For each current material risk, identify critical controls, and for each critical control, determine:

- The critical aspects of the design and operating performance criteria required to achieve the control's primary objective.
- The verification activities required to check that the critical control is operating effectively according to its design and
- A manual test plan is used to test that the critical control is achieving its primary objective and effectively managing the risk.

Table 4: Severity Matrix

IMPACT	1	2	3	4	5
	Insignificant	Minor	Moderate	Significant	Very significant
Financial impact on available cash	<\$200,000	<\$500,000	<\$1,000,000	<\$10,000,000	>\$10,000,000
Strategy	No or insignificant impact of ability to achieve strategic objectives	Minor impact of ability to achieve strategic objectives	Moderate impact of ability to achieve strategic objectives	Significant impact of ability to achieve strategic objectives	Unable to meet one or more strategic objectives
Management time	No or insignificant diversion of senior management time	Some senior management time required to minimise impact	Significant senior management time required to minimise impact	Significant diversion of senior management time required to minimise impact with some involvement of Lifezone ExCo and/or Lifezone Board	Complete diversion of senior management time for a prolonged period and significant involvement of Lifezone ExCo and/or Lifezone Board
Reputation	Minor, temporary impact on company reputation, legal rights or compliance, or social value proposition	Measurable but limited impact on company reputation, legal rights or compliance, or social value proposition at a local level (region, city, town)	Substantial impact on company reputation, legal rights or compliance, social value proposition, or ability to access opportunities at a sub national level (state, territory, province)	Serious impact on company reputation, investment attractiveness, legal rights or compliance, social value proposition or ability to access opportunities at a national level	Severe impact on company reputation, investment attractiveness, legal rights or compliance, social value proposition or ability to access opportunities at a global level
OHS	Minor Injury	Medical Treated Injury	Lost Time Injury	Irreversible disability or impairment	One or more fatalities
Environmental Impact	Minor, temporary impact to the environment, where the ecosystem recovers with little intervention	Measurable but limited impact to the environment, where recovery of ecosystem function takes less than 1 year	Substantial impact to the environment, where recovery of ecosystem function takes between 1 and up to 3 years	Serious impact to the environment, where recovery of ecosystem function takes between 3 and up to 10 years	Severe impact to the environment and where recovery of ecosystem function takes 10 years or more
Community	Minor, temporary community impact that recovers with little intervention	Measurable but limited community impact lasting less than one month	Substantial impact on community lasting 2-6 months	Serious impact on community lasting 6-12 months or a substantiated human rights violation impacting 1-5 persons	Severe impact on community lasting more than 12 months or a substantiated human rights violation impacting 6 or more people

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Treat risk

- a. For each current risk (either materials risk or non-material risk) and each one of short-term materials risks.
 - Implement preventive control to prevent the causes of a threat and mitigate controls to reduce its impacts.
 - implement controls to enable and/or enhance an opportunity; and
 - if the RRR \geq 80%, stop the activity or get approval to continue the activity by completing a risk evaluation under the TNCL Critical Control and risk evaluation.
- b. For each emerging risk, make sure contingency controls are in place when the RRR \geq 80%.

Table 5: Risk Evaluation


LIKELIHOOD	1	2	3	4	5
	Rare	Unlikely	Possible	Likely	Very likely
Probability of occurring at least once over the next three years	<10%	10 - 25%	25 - 50%	50 - 80%	>80%
Description	May occur only in exceptional circumstances	Could occur at some time	Might occur at some time	Will probably occur in most circumstances	Is expected to occur in most circumstances

Monitor and Review

- a. For each current material, risk follows under the TNCL Critical Control and Risk Evaluation register to perform a critical control effectiveness test (CET) and risk evaluation at least annually.
- b. For each emerging risk, TNCL will review the risk at least annually to confirm the following:
 - the risk remains an emerging risk and has not become a current risk.
 - the RRR remains accurate, and
 - any required contingency controls remain in place.
- c. TNCL will review the risk register for completeness and continued management of risks within requirements and get approval annually.

Communication

- a. Each risk with MFL \geq I Level 4 impact is to be recorded in the risk register.

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References:

- TNCL-OHS-REG-0003, Baseline Risk Assessment
- TNCL-OHS-REG-0012, Risk and Opportunity Register
- TNCL-OHS-SOP-0032, Hazard and Risk Management Procedure
- TNCL-OHS-SOP-0008, Hazard Identification Procedure

6.1.1. Risks and Opportunities

It is the responsibility of the top management to embed risk-based thinking into our organization's culture. This involves setting up risk management procedures and processes to ensure that effective risk and opportunity management principles are applied throughout the lifecycle of our operations, processes, health and safety management system, products, services, and activities.

- a. Providing sufficient resources to carry out risk and opportunity management activities.
- b. Assigning responsibilities and authorities for risk and opportunity management activities.
- c. Reviewing information and results from audits and risk and opportunity management activities.

After identifying significant hazards (6.1.2.1), safety risks, management system risks (6.1.2.2), safety opportunities, and other SMS opportunities (6.1.2.3), as well as legal and other requirements (6.1.3), our organization plans actions to avoid or mitigate perceived risks. We also take advantage of opportunities that improve safety.

To identify and evaluate risks associated with our health and safety management system, TNCL uses the Risk & Opportunity Register. This includes changes in the organizational context, strategy, and legal requirements that relate to the needs and expectations of our workers and other interested parties.

We take action in various ways, including through management review meetings, safety committee meetings, design review meetings, setting objectives, reviewing HPIs and policies, improving operational control, emergency preparedness planning, supplier evaluation, and other appropriate processes.


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Table 6: Risk & Opportunity Supporting documentation.

Ref	Title and description
1	Risk and Opportunity Procedure
2	Risk and Opportunity Register
3	Risk Assessment Procedure
4	Legal requirements and other requirements register
5	TNCL Critical Risk Control Standards (11)

TNCL has put in place and upheld the necessary procedures to comply with the requirements related to occupational health and safety management. When developing the OHS management system, TNCL takes into account the following factors:


- a. The issues that are relevant to the organization and its context.
- b. The requirements that are based on the needs and expectations of interested parties.
- c. The extent of the OHS management system's coverage.

TNCL has conducted a thorough analysis of the risks and opportunities associated with its compliance obligations, as well as other issues and requirements relevant to its organization and context. Additionally, the company has taken into account the needs and expectations of interested parties that must be addressed to achieve the following objectives:

- a. Assuring that the OHS (Occupational Health and Safety) management system can deliver the intended results.
- b. Enhancing desirable effects.
- c. Preventing or minimizing undesirable effects, including the possibility of external environmental factors impacting TNCL.
- d. Achieving continuous improvement.

TNCL has developed contingency plans to address potential emergencies identified in its OHS management system. When determining the risks and opportunities for the system and its intended outcomes, TNCL has considered.

- a) hazards,

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- b) OH&S risks and other risks,
- c) OHS opportunities, other opportunities,
- d) legal requirements, and other requirements.

In the planning process, TNCL has assessed risks and opportunities relevant to the intended outcomes of the OHS management system that may arise due to changes in the organization, processes, or the OHS management system. If any planned changes are to be made, whether permanent or temporary, TNCL will assess before implementing the change.

6.1.2. Hazard Identification and Assessment of Risks and Opportunities

6.1.2.1 Hazard Identification


TNCL understands that risks related to occupational ill-health can occur at all levels within our business. To be proactive in identifying hazards before they lead to accidents, incidents, or other safety-related occurrences, TNCL has adopted two methodologies for hazard identification: one reactive and one proactive.

- a) The **reactive** methodology involves analyzing past outcomes or events. Through an investigation of safety occurrences, hazards are identified. Incidents and accidents indicate system deficiencies and are used to determine which hazard(s) contributed to the event. Additionally, safety data analysis is performed to identify adverse trends and make predictions about emerging hazards. All this information is recorded and kept in the Hazard Identification Register.
- b) The **proactive** methodology involves collecting safety data from lower consequence events or process performance and analyzing the safety information or frequency of occurrence to determine if the system is effective.

TNCL has put in place a process to identify and manage hazards proactively.

This process considers various factors including:


- a. How work is organized, social factors (including workload, work hours, victimization, harassment and bullying, leadership, and the culture in the organisation.
- b. Routine and non-routine activities and situations, including hazards arising from:

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- i. Infrastructure, equipment, materials, substances, and the physical conditions of the workplace.
- ii. Product and service design, research, development, testing, production, assembly, construction, service delivery, maintenance, and disposal.
- iii. Human factors.
- iv. How the work is performed.
- c. Past relevant incidents, internal or external to the organization, including emergencies and their causes.
- d. Potential emergencies.
- e. People, including consideration of:
 - i. Those with access to the workplace and their activities, including workers, visitors, and other people.
 - ii. Those in the vicinity of the workplace can be affected by the activities of the organization.
 - iii. Workers at a location not under the direct control of the organization.
- f. Other issues, including consideration of:
 - i. The design of work areas, processes, installations, machinery/equipment, operating procedures, and work organization, including their adaptation to the needs and capabilities of the workers involved.
 - ii. Situations occurring in the vicinity of the workplace are caused by work-related activities under the control of the organization.
 - iii. Situations not controlled by the organization and occurring in the vicinity of the workplace can cause injury and ill health to persons in the workplace.
- g. Actual or proposed changes in organization, operations, processes, activities, and the Integration management system.
- h. Changes in knowledge of, and information about, hazards.

Reference:

TNCL-OHS-SOP-0008, Hazard Identification Procedure

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6.1.2.2 Physical Hazards and Management

TNCL has taken measures to identify the physical hazards present in its area of operations. To ensure the safety and health of all individuals who may be exposed to these hazards, TNCL has developed a control system. This system is designed to minimize or eliminate exposure to hazardous agents and conditions, based on the degree of risk. The hazards that have been identified and defined include:

- a. Noises,
- b. Radiation
- c. Vibration
- d. Chemical hazards
- e. Ergonomic hazard
- f. Biological hazard
- g. Psychological hazard
- h. Thermal Environment
- i. Pressure environment

Reference:

TNCL-OHS-SOP-0008, Hazardous Material Risk Control Standard

TNCL-OHS-SOP-0012, Hazardous Chemical Agents Management Procedure


TNCL-OHS-SOP-0017, Respiratory Protective Equipment

TNCL-OHS-PLN-0006, Ergonomic, and Manual Handling Plan

6.1.2.3 Assessment of OHS Risks

TNCL has developed and implemented processes to evaluate occupational health and safety (OH&S) risks associated with identified hazards, while also considering the effectiveness of existing controls. Additionally, TNCL identifies and assesses other risks related to the establishment, implementation, operation, and maintenance of the OH&S management system.

The methodology and criteria used by TNCL for assessing OH&S risks have been defined in terms of their scope, nature, and timing. This ensures that the assessments are proactive

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rather than reactive and are carried out systematically. TNCL has documented information on the methodology and criteria used, which is maintained and retained for future reference.

References:

- TNCL-OHS-REG-0003, Baseline Risk Assessment
- TNCL-OHS-REG-0028, Occ Health, Baseline Risk Assessment (BRA)
- TNCL-OHS-REG-0026, Occupational Risk Exposure Program (OREP)
- TNCL-OHS-SOP-0032, Hazard and Risk Management Procedure


6.1.2.4 TNCL Critical Risks Control and Management (Material Risks)

TNCL has set up Risk Control Standards with the aim of reducing the risk of fatalities and injuries in the workplace. The company strongly believes that a thorough comprehension of workplace hazards and their controls, coupled with effective leadership, will help in making decisions and taking actions that ensure a safe work environment. TNCL has identified eleven (11) critical risks and has established, implemented, and maintained control standards to take a proactive approach toward risk management.

1. Aviation Risks
2. Equipment and Safeguarding
3. Vehicle Operations Risks
4. Working at Heights Risks
5. Lifting and Rigging Risks
6. Hazardous Substance and Chemical Risks
7. Isolation and Tagout Risks
8. Explosive and Blasting Risks
9. Ground Falls Risks
10. Fire Risks

Reference:

- TNCL-OHS-REG-0003, Risk Register
- TNCL-OHS-FRM-0002, Occ Health, Baseline Risk Assessment (BRA)
- TNCL-OHS-PLN-0002, Occupational Health & Medical Plan
- TNCL-HRE-SOP-0005, Plan Task Observation (PTO)

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TNCL-OHS-SOP-0008, Hazard Identification Procedure
 TNCL-OHS-SOP-0032, Risk Assessment Procedure
 TNCL Critical Risk Control Standards (12)

6.1.2.5 Field-Level Risk Assessment (FLRA)

Field Level Risk Assessments (FLRA) is a crucial tool used by TNCL to identify and rectify potential OHS Risks before starting work every day. FLRA involves checking a list of pre-identified potential hazards and established controls. This helps to ensure that any new or unusual hazards are not present, and all necessary precautions are taken to mitigate known risks.

Reference

TNCL-OHS-FRM-0007, Field Level Risk Assessments Tools.

6.1.2.6 Job Safety Analysis (JSA)


Identifying, evaluating, and controlling potential occupational health and safety (OHS) risks that may arise from a new or modified work activity is an important aspect of the TNCL OHS Management System. To accomplish this, the OHS Manager will ensure that a Job Safety Analysis (JSA) is performed for every new or modified work task. The OHS Manager will use their professional judgment to determine which jobs or activities are included in the analysis.

The TNCL JSA process will systematically evaluate potential OHS hazards to the best of its ability, including all types of hazards that are potentially present. Each risk assessment will:

- a. Identify and recommend the appropriate personal protective equipment (PPE) for the work.
- b. Generate a risk ranking that prioritizes the hazards of various work tasks.
- c. Encourage the development of a risk-reduction strategy.
- d. Set a date for reviewing the assessment to determine if corrective action has been taken and provide evidence that these reviews have occurred.
- e. Generate a report that can be shared with management and personnel.
- f. Be used as a tool for investigating accidents/incidents.

Reference:

TNCL-OHS-FRM-0029, Job Safety Analysis

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6.1.2.7 Assessment of OHS Opportunities

TNCL has established a system to assess the following aspects related to occupational health and safety (OHS):

- a. Opportunities to improve OHS performance while considering any planned changes to the organization, policies, processes, or activities, including adjusting work, work organization, and work environment to better suit workers.
- b. Possibilities to eliminate hazards and minimize OH&S risks.
- c. Alternative methods to enhance the OH&S Management System.

References:

TNCL-OHS-REG-0012, Risk and Opportunity Register


6.1.2.8 Design, Construction, and Assets Management

TNCL has implemented a continuous and proactive process for identifying hazards. This process prioritizes safety within a design framework that sets a standard for implementing safety measures throughout the project's lifecycle. The process systematically assesses and manages risks that may arise from the project, from the selection phase through to execution.

TNCL takes into account the various stages and controls involved in design, construction, and asset management.

Here are some of the key considerations that TNCL adheres to:

- a. Project plans are developed with safety in mind.
- b. Control interfaces are established between individuals involved in the safety design process.
- c. Project personnel and contractors are selected based on their level of experience.
- d. Formal hazard identification and safety studies are conducted at the appropriate stage of design.
- e. Options for inherently safer designs are reviewed.
- f. Safety considerations related to design decisions are addressed, managed as reasonably practicable, and documented.

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- g. Materials risk events, safety-critical elements, critical risk controls, and performance standards are identified or updated.
- h. The required process stages, including applicable design and development reviews, are carried out.
- i. TNCL collaborates with suppliers in the safety design and development process.
- j. Verification and validation of safety in design are required.
- k. Roles and responsibilities of the individuals involved in safety in the design process are clearly defined.

Reference:

TNCL-OHS-STD-0013, Safety in Design and Controls Standard

6.1.3. Legal Requirements and Other Requirements

TNCL has established, implemented, and maintained a process to;

- a. Ensure that it has access to the latest legal requirements and other requirements that apply to its hazards, OH&S risks, and OHS management system.
- b. Determines how these legal requirements and other requirements apply to its operations and ensures that the information is communicated to the relevant parties.
- c. Takes these legal requirements and other requirements into account when establishing, implementing, maintaining, and continually improving its OHS management system.

TNCL has also maintained and retained documented information on its legal requirements and other requirements and ensures that it is up to date to reflect any changes.

Reference:

TNCL-OHS-SOP-0030, Legal and other requirements Procedure.


TNCL-OHS-REG-0010, Legal Compliance Register

TNCL-OHS-REG-0011, Evaluation of Legal Compliance Register

6.1.4. Planning Action and Management OHS Risks

TNCL has planned to take action to:

- a. Address its significant OHS risks.
- b. Address legal requirements and other requirements (Compliance obligations);

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- c. Address Risks and opportunities identified.
- d. Prepare for and respond to emergencies.

How to:

- a. Integrate and implement the actions into its OHS management system processes or other business processes.
- b. Evaluate the effectiveness of these actions.

TNCL shall take into account the hierarchy of controls and outputs from the OHS management system when planning to take action.

When planning these actions, TNCL considers its technological options and its financial, operational, and business requirements. Also, the company ensures that actions taken to address risks and opportunities are proportionate to the potential impact on the conformity of products and services.

The hierarchy of controls will be applied, which ranges from elimination to personal protective equipment.


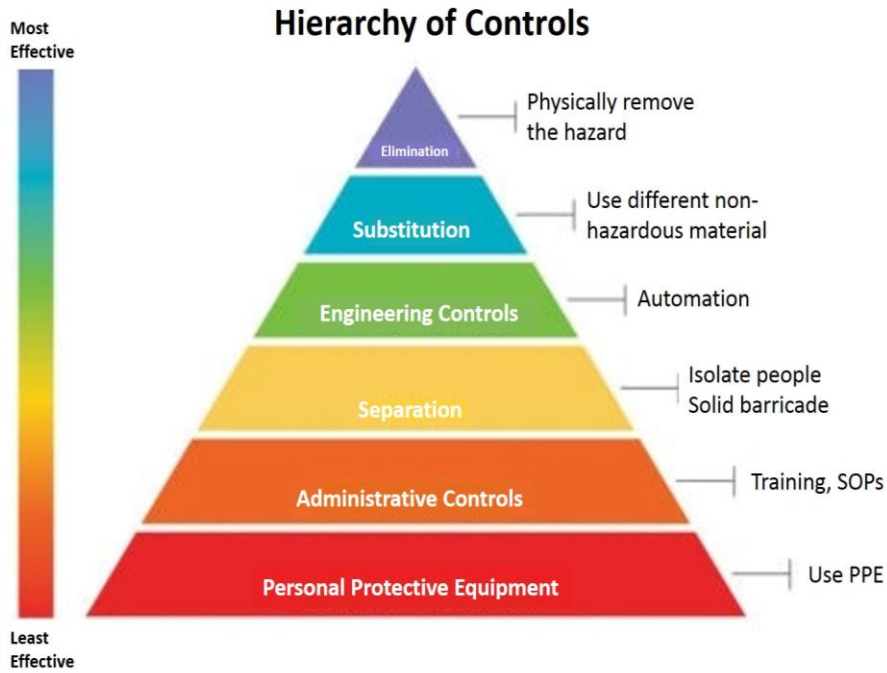
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Figure 5: Hierarchy of controls




Reference:

- TNCL-OHS-REG-0012, OHS Risks and Opportunities Register
- TNCL-OHS-REG-0011, Evaluation of Legal Compliance
- TNCL-OHS-FRM-0002, Occupational Health Risk Assessment

6.1.5. Occupational Health Program Implementation

TNCL occupational health program aspects apply to its operations and activities. These aspects are directed toward the prevention of all types of accidents and health hazards present in the performance of duties. All occupational aspects are considered within a comprehensive health program.

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6.1.5.1 Medical Standard

TNCL has established and documented the physical and mental requirements for each job position. The company aims to divide each job position into tasks and evaluate the physical and mental requirements for each task.

- a. All Fitness for Work examinations will assess workers' fitness against the health requirements of their respective appointed job positions.
- b. Before the offer of employment, every employee must undergo a pre-employment medical examination that complies with the TNCL Health System.
- c. All workers must undergo a periodic health examination at least once every year.
- d. Employees who are exposed to lead, arsenic, mercury, silica, drugs and alcohol, respiratory issues, and noise must undergo Medical Surveillance exams.
- e. A data management system will be in place to collect, analyze, and report data to the management. This system will help the management recognize trends and facilitate the implementation of change.

6.1.5.2 Medical Surveillance

Health surveillance is a systematic inspection or examination of workers and work areas. This data is collected, analyzed, interpreted, evaluated, and disseminated promptly to ensure that the health and well-being of individuals or groups of workers align with work requirements.

Components: Hazard monitoring, Fitness for work examinations – pre-employment, periodical, special risk or group exposure (lead, arsenic, mercury, silicon), exit from employment, Drug and Alcohol programs.


Reference

TNCL-OHS-SOP-0016, Medical Surveillance Program.

TNCL-OHS-FRM-0017, Alcohol Screening.

TNCL-OHS-POL-0002, Alcohol & Other Drugs Policy.

TNCL-OHS-REG-0002, Clinic Database

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6.1.5.3 Medical Examination

TNCL medical examinations shall be conducted by a physician, nurse, or equivalent, as allowed by law.

- a. Pre-employment or Pre-examination is required when.
 - The proposed job has specific health requirements or
 - Current conditions pose a health risk; or
 - As a legal requirement.
- b. A periodic medical surveillance program is required when:
 - There is a probability that a health effect could occur from conditions on-site and
 - There is a test that can detect that effect reliably and
 - Detecting the abnormality brings a health benefit to the worker and
 - Annual medical examination as per legal requirement.
- c. Employees must undergo an examination for health reasons for resumption of work after a prolonged absence.
- d. A medical examination is required on termination of employment, or where this is not legally possible, must be offered when either:
 - There is a possibility that health changes could have occurred or may occur in the foreseeable future.
 - There is a need to document the degree of health changes during employment or
 - An exit medical examination is required as per legal requirements.

Reference:

TNCL-OHS-FRM-0001, Medical Examination Form
 TNCL-OHS-FRM-0030, Medical Fitness Certificate
 TNCL-OHS-SOP-0016, Medical Surveillance Program
 TNCL-OHS-SOP-0018, Hearing Conservation Program

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6.1.5.4 Biological Testing

- a. Occupational health physicians or medical practitioners shall retain overall responsibility for biological tests and other medical investigations.
- b. Biological monitoring shall not be a substitute for monitoring the working environment and assessing individual exposures.
- c. When a workplace environment standard (OEL) and a biological standard are met, compliance with both must be achieved; compliance with one cannot be used to excuse non-compliance with the other.

Reference:

TNCL-OHS-SOP-0007, Medicine & Medical Supplier Handling Procedure

TNCL-OHS-FRM-0015, Chronic Medical Condition, Vaccination & Allergy screening.


6.1.5.5 Management of Medical Incapacity and fitness for work

TNCL has implemented and maintained a process to manage sickness absenteeism, impairment, disability management, and termination of employees due to medical grounds. The fitness for work management will consider the employee's medical condition(s), job description, the outcome of the Occupational Risk Exposure Program (OREP), the risk assessment, and the Maximum Medical Improvement report (if applicable), as well as the TNCL Fatigue Management Plan. This ensures that the employees are fit for work and that their medical condition is taken into account while assessing their workability.

Reference:

TNCL-OHS-SOP-0038, Medical Incapacity Procedure

TNCL-OHS-PLN-0004, Fatigue Management Plan

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6.1.5.6 Occupational Hygiene Assessment


The TNCL workplace monitoring program is designed to assess any potential health hazards that may arise in our operations. It is specifically aimed at monitoring, sampling, and analyzing work-related exposures. This program does not extend to environmental or community monitoring, although some principles may apply to all monitoring programs. TNCL follows internationally approved standards (HSE, NIOSH, OISH) for occupational hygiene assessment and uses accredited laboratories for analysis.

The TNCL monitoring programs include the industrial hygiene areas such as:

- a. Workplace Monitoring
- b. Occupational Exposure Limits
- c. Particulate and gas vapour exposures
- d. Hearing Conservation
- e. Manual Handling and vibration
- f. Hazardous Substances
- g. Radiation
- h. Thermal Stress
- i. Fatigue/Stress

6.1.5.7 Community Health

TNCL recognizes the importance of the health of the community surrounding the project area in ensuring business continuity. Therefore, it is committed to supporting the local community's health within the project area. TNCL will extend its support to the community in the areas of HIV/AIDS, tuberculosis, Malaria, and Breast cancer projects. In case of a contagious disease outbreak, TNCL will work with the local government of the community surrounding the project area to implement measures to manage the outbreak.

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6.1.5.8 Travel Preparedness and Remote Site Health

TNCL has developed, established, and maintained a Travel Health Management Process that encompasses general travel health concerns associated with temporary site visits, as well as health issues associated with working in remote areas. The program is designed to ensure that workers, contractors, and third parties are not exposed to any adverse health effects while travelling. Travelling from one country to another is a risk in itself, and it comes with different disease patterns and vaccination requirements per country.

TNCL encourages the management of travel-related health risks and ensures that:

- a. The program is followed to minimize the impact of travel-related ill-health as far as practically possible, and all international travellers are adequately prepared before travel.
- b. A program adheres to prevent both chronic and acute illness by proper sanitation and control of disease vectors at a remote location.

Reference:


TNCL-OHS-SOP-0014, Travel Health Management Procedure.

6.2. Health and Safety Management System Objectives

6.2.1. Occupational Health and Safety Objectives

TNCL has established OHS objectives at relevant functions, levels, and processes to maintain and continually improve the OHS management system and OHS performance. The OHS objectives shall:

- a. Be consistent with OHS policy.
- b. Be measurable (if practicable) or capable of performance evaluation.
- c. Consider:
 - Applicable requirements.
 - The results of the assessment of risks and opportunities.
 - The results of consultation with workers and workers' representatives.
- d. Be monitored.

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- e. Be communicated with relevant personnel.
- f. Be updated as appropriate.

Reference:

TNCL-OHS-REG-0013, OHS Objectives Register

6.2.2. Objective and Planning to Achieve

When planning how to achieve its OHS objectives, TNCL has determined the following:

- a. What will be done?
- b. What resources will be required?
- c. Who will be responsible?
- d. When will it be completed?
- e. How will the results be evaluated, including indicators for monitoring?
- f. How will the actions to achieve OHS objectives be OHS in the organisation’s business processes?

Reference:


TNCL-OHS-REG-0013, OHS Objectives Register

7. SUPPORT

7.1. Resources

The top management of TNCL is responsible for planning, providing, and maintaining the necessary infrastructure and resources for achieving product and process conformance. This includes buildings, workspaces, utilities, process equipment (both hardware and software), and supporting services, such as internal transportation, material handling systems, and communication systems. Our operational procedures, work instructions, and management system manual outline the resource requirements for implementing, managing, controlling, and continually improving our health and safety management system.

- a. Planning; Section 6.0
- b. Management review; Section 9.3
- c. Human resources; Section 7.1.2

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- d. Infrastructure; Section 7.1.3
- e. Work environment; Section 7.1.4
- f. Planning operational control; Section 8.1
- g. Determination of emergency response; Section 8.2

The engineering department, with support from the OHS Manager, is responsible for managing the occupational health and safety hazards present in our facilities. This includes hazards that exist intrinsically within our equipment, methods, processes, or maintenance programs. Some of the areas covered by this responsibility include.


- a. Transportation, storage, and material handling,
- b. Equipment management, maintenance, and repair,
- c. Process and production equipment management, maintenance, and repair, and
- d. Facilities management, maintenance, and repair.

All maintenance work is carried out according to the original equipment manufacturers' recommendations and is recorded in the Equipment Maintenance & Service Log for each piece of equipment. We continuously monitor the accuracy and performance of the equipment, and we pay special attention to items of key safety equipment that require statutory inspections.

7.2. Competence

TNCL management conducts regular management reviews to identify emerging competency needs. These needs are then converted into job descriptions for the type and number of positions that need to be filled, either through internal or external recruitment. To ensure the competence of our workers and contractors, job descriptions have been prepared, which include the qualifications, experience, interactions, and responsibilities required for each position.

Qualifications are reviewed upon hiring a new employee when an existing employee changes positions, or when the requirements for a position change. Qualifications encompass desired educational requirements, skills, and experience. The provision of appropriate qualifications, along with any necessary training, ensures the competence of each position. Before hiring, changing positions, or changing job requirements, the Human Resources department reviews employees' qualifications.

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TNCL has taken the following steps to ensure the necessary competence of persons working under its control:

- a. Determined the competence necessary for each job position, the performance and effectiveness of the OHS management system, and its ability to meet compliance obligations.
- b. Ensured that individuals are competent (including the ability to identify hazards), based on appropriate education, training, or experience.
- c. Identified training needs based on its risks, opportunities, and OHS management system.
- d. Maintained appropriate documentation as evidence of competence.
- e. Taken necessary actions to acquire the required competence and evaluated the effectiveness of these actions.

Applicable actions for TNCL can include, for example, the provision of training to, the mentoring of, or the re-assignment of currently employed persons or the hiring or contracting of competent persons.


Reference:

- TNCL-HRE-FRM-0014, Training Need Analysis
- TNCL-HRE-REG-0001, Competence Training Matrix
- TNCL-HRE-SOP-0002, Training and Authorization Procedure
- TNCL-HRE-FRM-0005, Training Declaration Form
- TNCL-HRE-FRM-0015, Training Requisition Form
- Competence and Awareness
- Competence certificates

7.3. Awareness

TNCL has taken measures to ensure that individuals carrying out work under the organization's control are fully informed about the following:

- a. The OHS Management Policy.
- b. Relevant OHS objectives.
- c. The OHS risks and potential consequences associated with their work.

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- d. Hazards, OHS risks, and actions taken that are relevant to them.
- e. How their contribution can enhance the effectiveness of the OHS management system, including the benefits of improved OHS performance.
- f. Incidents and the results of investigations that are relevant to them.
- g. The implications and possible outcomes of not complying with the OHS management system requirements, including failing to meet the organization's compliance obligations.
- h. The right to remove themselves from work situations that they consider posing an immediate and serious danger to their life or health, as well as the measures in place to protect them from any undue consequences for doing so.


Reference:

TNCL-OHS-FRM-0025, Internal Awareness Attendance
 TNCL-OHS-SOP-0015, Stop Work Authority Procedure
 TNCL-OHS-POL-0006, Stop Work Authority Policy

7.4. Communication

TNCL has established, implemented, and maintained the process needed for internal and external communications relevant to the OHS management system, including:

- a. On what it will communicate.
- b. When to communicate.
- c. With whom to communicate.
 - i. Internally, it is among the various levels and functions of the organisation.
 - ii. Among contractors and visitors to the workplace
 - iii. Among other interested parties
- d. How to communicate.
- e. Who communicates?

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TNCL has made sure to consider diversity aspects such as gender, language, culture, literacy and disability in establishing its communication process. The company has also taken into account feedback from external interested parties when developing its communication plan. In doing so, TNCL has made sure to comply with all legal requirements and other compliance obligations related to communication. Additionally, the company ensures that all OHS-related information communicated is consistent with the information generated within the OHS management system and is reliable.

TNCL is committed to responding promptly to any relevant communications related to its OHS management system and maintains documented information as evidence of its communications, as required.

7.4.1. Internal communication

TNCL internally communicate relevant information about its OHS management system across various levels and functions of the organization, including any changes to the system. Additionally, it ensures that its communication process allows individuals working under its control to contribute to continuous improvement efforts.

7.4.2. External communication

TNCL has communicated relevant information related to its OHS management system externally, following the organization's communication process and compliance obligations.

Reference:

TNCL-OHS-SOP-0031, Internal and External Communication Procedure

7.5. Documented information

TNCL OHS management system Documented information includes the information required by the International Standard, as well as any additional documented information deemed necessary for the effectiveness of the OHS management system as determined by the organization.


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Figure 6: The OHS documentation is composed of 5 levels, as described below.




Level 1 OHS Manual, which outlines the policies, directions, and legal compliance that TNCL follows. The manual refers to other OHS management system procedures that are used to meet specific policies and approaches.

Level 2 is the OHS Policy, which describes the commitments made by top management to ensure the health and safety of workers and the workplace. It also implements workplace health and safety programs.

Level 3 is the Standard Operating Procedures/Process (SOP), which are used to effectively control the implementation of the OHS Management System.

Level 4 includes other documentation such as Managerial/work instructions, standards, guidelines, specifications, plans, terms and conditions, legal reports, and external documents. These are all used as supporting references in the implementation of OHS.

Level 5 consists of forms, records, work permits, registers, reports, drawings/maps and checklists related to the implementation of the organization's OHS Management System.

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7.5.1. Management System Documents

TNCL's OH&S management system has included:

- a. Documented information required by ISO Standard requirements.
- b. Documented information is determined by the organisation as necessary for the effectiveness of the OHS management system.

7.5.2. Creating and Updating

When creating and updating documented information, TNCL ensures appropriate.

- a. Identification and description, e.g. a title, date, author, or reference number.
- b. Format, e.g. language, software version, graphics, and media (e.g. paper, electronic).
- c. Review and approval for suitability and adequacy.

7.5.3. Control of Documented Information

Documented information required by the OHS management system and by these International Standards is controlled to ensure:

- a. It is available and suitable for use where and when it is needed.
- b. It is adequately protected (e.g., from loss of confidentiality, improper use, or loss of integrity).

For the control of documented information, TNCL has addressed the following activities, as applicable:

- a. Distribution, access, retrieval, and use.
- b. Storage and preservation, including preservation of legibility.
- c. Control of changes (e.g., version, revision control).
- d. Retention and disposition.

Documented information of external origin determined by TNCL to be necessary for the planning and operation of the OHS management system shall be identified, as appropriate, and controlled.


Reference:

TNCL-OHS-SOP-0001, Document Control Procedure

TNCL-OHS-FRM-0012, Document Request Form

TNCL-OHS-REG-0001, Documented Information Master Control Register

TNCL-OHS-REG-0027, External Origin Document Register

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8. OPERATION

8.1. Operational Planning and Control

TNCL has established a system to identify and assess occupational health risks. This system is documented in section 6.1.2. The company implements appropriate controls to mitigate the risks. All teams and departments follow occupational health and safety procedures using appropriate documentation, competent workers, and safe routines.

TNCL ensures that all operational activities, including product and service outputs, meet safety requirements and regulatory standards. The company controls aspects of product safety to mitigate risks to workers and end-users throughout the product life cycle.


This includes assessing hazards and managing associated risks (see 6.1.2), managing safety-critical items, analyzing and reporting safety-related events, and communicating events to affected workers and contractors while providing training as needed.

The maintenance and operation of machinery and equipment that may impact safety performance should be inspected, tested and maintained to ensure it complies with design descriptions and specifications. Documentation for crucial processes, machinery, and equipment must be kept and made available, including the following, where applicable:

- a. Regulations and relevant legislation.
- b. Reports on hazard assessment.
- c. Operating procedures and criteria for operation.
- d. Engineering drawings, specifications, and standards.
- e. Strategies for maintenance, inspection, and testing.
- f. Characteristics of products or materials that are essential for safe and appropriate use.

The operation of various tools involves a wide range of tasks such as starting, stopping, repairing, modifying, installing, dismantling, programming, setting, transporting, maintaining, servicing, and cleaning. To ensure safety and efficiency, certain requirements must be met. These include:

- a. Ensuring that dangerous parts of machinery are properly guarded.
- b. Ensuring that equipment is appropriate for its intended use.

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- c. Ensuring that equipment complies with the OEM product safety directive.
- d. Ensuring that the equipment is in good working condition and has been maintained well.

Equipment selection criteria:

- a. Sourced from a reputable supplier.
- b. Supplied with clear and understandable operating instructions.
- c. Provided with physical evidence of conformity to OEM directives.
- d. Significant risks associated with its use must be assessed and adequately controlled.
- e. All equipment is visually checked before use.

TNCL has planned, implemented, controlled, and maintained the processes needed to meet the OHS management system and implemented the actions determined by:

- a. Establishing criteria for the processes.
- b. Implementing control of the processes, following the criteria.
- c. Determining, maintaining, and retaining documented information to the extent necessary to have confidence that the processes have been carried out as planned:
- d. Adapting work to workers

8.1.1. *Eliminating Hazards and Reducing Risk*


TNCL has established, implemented, and maintained a process for the elimination of hazards and reduction of OH&S risks using the following hierarchy of controls:

- a. Eliminate the hazard.
- b. Substitute with less hazardous processes, operations, materials, or equipment.
- c. Use engineering controls and reorganisation of work.
- d. Use administrative controls, including training.
- e. Use adequate personal protective equipment, which can be used individually or in combination.

Reference:

TNCL-OHS-SOP-0008, Hazard Identification Procedure

TNCL-OHS-SOP-0032, Risk Assessments Procedure

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8.1.2. Management of Change

TNCL has established a process for the implementation and control of planned, temporary, and permanent changes that impact OHS performance, including:

- a. New products, services, and processes, or changes to existing products, services, and processes, including:
 - i. Workplace locations and surroundings.
 - ii. Work organisation.
 - iii. Working conditions.
 - iv. Equipment.
 - v. Workforce.
- b. Changes to legal requirements and other requirements.
- c. Changes in knowledge or information about hazards and OHS risks.
- d. Developments in knowledge and technology.

TNCL shall review the consequences of unintended changes, taking action to mitigate any adverse effects as necessary.

Reference:

TNCL-OHS-SOP-0058, Management of Change Procedure.

8.1.3. Procurement


TNCL has established, implemented, and maintained a process to control the procurement of products and services to ensure their conformity to its OHS management system.

Reference:

TNCL-PRO-SOP-0001, Procurement of Goods & Services

TNCL-PRO-GDL-0003, Suppliers Verification

TNCL-PRO-FRM-0002, Suppliers Onboarding Questionnaire

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8.1.4. Contractors

TNCL has coordinated its procurement processes with contractors to identify hazards and assess and control the OHS risks arising from:

- a. The contractor's activities and operations that impact the organisation.
- b. The organisation's activities and operations impact the contractor's workers.
- c. The contractors' activities and operations impact other interested parties in the workplace.

Reference:


TNCL-OHS-POL-0004, Health & Safety Requirement for Contractors
 TNCL-OHS-SOP-0005, Contractors Management Procedures
 TNCL-OHS-CHK-0008, Contractors' Management Pre-index Checklist.
 TNCL-OHS-CHK-0014, Contractors OHS Assessment
 TNCL-OHS-CHK-0011, Contractors' Pre-qualification Checklist.
 TNCL-OHS-CHK-0010, Contractors Hazard Review Checklist.
 TNCL-OHS-CHK-0012, Contractors List of documents (pack) Checklist.
 TNCL-OHS-CHK-0015, Contractor's Operations files Checklist.

8.1.5. Contractors' Vehicle and Equipment On-Site

TNCL has established, implemented, and maintained a process to control and mitigate the risk of substandard equipment and machinery brought on-site by contractors, vendors, and other delivery trucks. Pre-inspection shall be conducted on the vehicle, equipment, and machinery before entering the site premises. The inspection shall also include the review of statutory inspection records (if required), maintenance records, and licenses to ensure they are fit for use and in mechanically safe and sound condition.

Reference:

TNCL-OHS-SOP-0005, Contractor's Management Procedure
 TNCL-OHS-POL-0004, Health and Safety Requirements for Contractors
 TNCL-ENG-SOP-0012, Light Vehicle Procedure
 TNCL-OHS-FRM-0016 - Equipment and Vehicle Inspection Form

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8.1.6. Outsourcing

TNCL has ensured that its outsourcing arrangements are consistent with legal requirements and other requirements and with achieving the intended outcomes of the OHS management system. The type and degree of control or influence to be applied to these functions and processes shall be defined within the OHS management system.

8.2. Emergency Preparedness and Response

TNCL has established, implemented, and maintained the processes/procedures needed to prepare for and respond to potential emergencies identified.

- a. Establishing a planned response to emergencies, including the provision of first aid.
- b. Providing training for the planned response.
- c. Periodically testing and exercising the planned response capability.
- d. Periodically review and revise the process and planned response actions after the occurrence of emergencies or tests.
- e. Communicating and providing relevant information to all workers on their duties and responsibilities.
- f. Communicating relevant information to visitors, emergency response services, government authorities, and, as appropriate, the local community.
- g. Taking into account the needs and capabilities of all relevant interested parties and ensuring their involvement, as appropriate, in the development of the planned response.

TNCL has maintained and retained documented information on the process and on the plans for responding to potential emergencies.

Reference:


TNCL-OHS-PLN-0001, Emergency and Crisis Management Plan

TNCL-OHS-SOP-0039, Medical Emergency Evacuation

TNCL-OHS-SOP-0033, Emergency and Callout Procedure

TNCL-OHS-STD-0012, Fire Hazard Critical control risk standard.

TNCL Emergency Response Team

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8.2.1. Emergency Management Plan

TNCL has determined emergency plans that define responses (including the mitigation of OHS impacts) to foreseeable emergency scenarios are documented, accessible, communicated, and reviewed. The plans define roles and responsibilities for employees and business partners.

Emergency response plans are appropriate for the size of the site's operations, the Company's business continuity requirements, and external response organisations, taking into account their response capabilities.

Emergency response plans include assigned responsibilities for:

- a. Emergency equipment inventory and locations, including operating and maintenance requirements.
- b. Site Emergency Response Team personnel
- c. Site Emergency Management Team personnel
- d. Local Critical Incident Management Team personnel
- e. Initial and refresher training needs
- f. Incident command at all levels of the organisation

Resources, including appropriate personnel, equipment, and warning devices required for emergency response and ongoing recovery activities, are identified, maintained, tested, and available.


Employees, business partners, visitors, and external stakeholders are trained in and competent to deal with the requirements of the emergency response plans, and they understand their respective roles and responsibilities, as well as the use of emergency response resources.

Emergency response drills and exercises are scheduled and conducted regularly, including liaison with and involvement of external response organisations and other stakeholders as appropriate.

Learning from emergency response drills, exercises and incidents are documented, incorporated into revisions of plans and resources, and shared with stakeholders and others as appropriate.

Reference:

TNCL-OHS-PLN-0001, Emergency and Crisis Management Plan

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8.2.2. Emergency Drill

TNCL has established, implemented, and maintained the plan to undertake the emergency drills to prepare to respond to potential emergencies identified; the plan includes.

- a. While drills and exercises can be used for training purposes, their primary function is to assess the adequacy and effectiveness of the Emergency Plan.
- b. The OHS Manager is responsible for ensuring that emergency drills are periodically conducted in all work areas. This is recommended at six monthly intervals.
- c. The Department Managers are responsible for coordinating the emergency drills in the areas under their direction and implementing recommendations.
- d. Emergency response personnel are responsible for conducting these drills and making recommendations.
- e. The scenarios used in emergency drills will be realistic and based on current operating conditions. The primary event (fire, spill, security threats, etc.) is to be determined based on the objective of the exercise.

Reference:

TNCL-OHS-REP-0001, Emergency Drill & Debrief Report


TNCL-OHS-SOP-0033, Emergency Call-out Procedure.

TNCL-OHS-SOP-0039, Medical Emergency Evacuation

8.2.3. Accidents and Incidents

TNCL has determined that the OHS incidents, including near misses, have been reported, investigated, and analyzed. Corrective and preventive actions are taken, and learning is shared. Learning from the past is essential to creating a better future. It is the essence of continuous improvement. TNCL has determined that.

- a. TNCL shall have a formal system in place for the timely reporting, investigation, mitigation, and appropriate communication of all OHS incidents, non-conformances, and near misses.
- b. The formal incident reporting and investigation system shall define the methodology, responsibility, and authority for the investigation of incidents, near misses, and non-conformances.

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- c. Incident investigations identify and prioritize corrective and preventive actions aimed at eliminating or reducing the risk and recurrence of incidents and near misses. Systems are in place to ensure that these actions, including changes in procedures, are documented, communicated, followed up, and completed. Initial Flash notification report shall be sent immediately, and within 24 hours, a full investigation report with corrective measures will be shared.
- d. In the event of a significant incident, systems ensure that associated work does not resume until actions have been taken to reduce the risk of recurrence and authorization is given.
- e. Information gathered from incident investigations is analysed to identify lessons monitor trends and report to management to improve standards, systems, and practices. Learnings are shared across the company and with stakeholders and others as appropriate.


Reference:

- TNCL-OHS-SOP-0002, Incident/Injury Reporting & Investigation Procedure
- TNCL-OHS-FRM-0051, Personal Incident Statement
- TNCL-OHS-FRM-0008, Incident Reporting Form
- TNCL-OHS-REP-0002, ICAM Investigation Report
- TNCL-OHS-FRM-0034, Incident Flash Report
- TNCL-OHS-FRM-0085, Non-conformity & Corrective Action Form

8.2.4. Corrective Actions.

All corrective actions and recommendations from incident and accident investigation shall be recorded in an appropriately designated database (or XL sheet), and regular reminders will be sent to the persons assigned to complete actions. The recommended actions will be signed off by the assignee or delegate once completed and returned to the OHS department for recording.

Proof of action will be sent to the OHS administrator for verification and record keeping. A review of both the investigation report and implementation of recommended actions must be formalized with an agreed schedule to ensure effective follow-up. Appropriate resources must be made available for the timely completion of action items.

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Reference:

TNCL-OHS-SOP-0002, Incident Reporting and Investigation Procedure

TNCL-OHS-REG-0019, Incident / Accident Monitoring & Action Tracker

TNCL-OHS-FRM-0085, Non-conformity & Corrective Action Form

8.2.5. First Aid and Medical Facilities

TNCL has ensured that all workers have access to appropriate first aid facilities and skills to undertake point-of-work responses.

- a. The extent and complexity of first aid facilities and the availability of trained first aiders shall be determined through the risk management process. This will consider the number of workers, the location of the workplace, the type of work undertaken, and the expediency of alternative medical assistance. It also needs to consider Government legal requirements.
- b. First aid kits shall not contain anything other than approved first aid supplies. First Aid kits shall have a list of usual contents kept within the kit.
- c. The location of first aid facilities shall be identified.
- d. The names and locations of First Aiders shall be communicated to all employees, contractors, and visitors. Names of first aiders and emergency information should be displayed prominently on or adjacent to first aid kits.
- e. All first-aid injuries are to be recorded on a normal incident report.

Reference:


TNCL-OHS-FRM-0030, Medical Fitness Certificate

First Aiders (trained personnel)

Workplaces First Aid Kit boxes

First Aid Kit Inspection

OSHA Act, No 5. 2003

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8.2.6. Fire Precautions

TNCL has ensured appropriate fire control arrangements and a comprehensive emergency response plan that effectively deals with any foreseeable emergency.


- a. All foreseeable fire emergencies shall be identified, and the specific response to each will be defined and included in the plan. The plan is to be prominently displayed.
- b. All personnel shall be trained in the safe operation of firefighting equipment according to Fire & Emergency regulations.
- c. Appropriate fire training shall be conducted for all personnel, including those who have specific responsibilities. Evacuation drills shall be conducted for all personnel at least annually.
- d. The location of all fire and emergency equipment shall be displayed and readily accessible.
- e. Fire protection and Emergency equipment shall be regularly inspected, tested, and maintained to ensure it is in proper working order.

Reference:

TNCL-OHS-SOP-0033, Emergency Callout Procedure

TNCL-OHS-CHK-0024, Fire Extinguisher Inspection

TNCL-OHS-STD-0012, Fire Hazard Critical control risk standard.

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9. PERFORMANCE EVALUATION

9.1. Monitoring, Measurement, Analysis, and Evaluation

TNCL measures its safety performance and compliance by using leading (proactive) and lagging (reactive measures) to monitor and measure the safety performance data that is needed to make effective data-driven safety decisions.

TNCL management receives regular reports on the health and safety performance of contractors and their actions. Performance reports are prepared every month by the OHS Manager and communicated to the management. The frequency at which our safety processes are monitored, measured, analyzed, and evaluated is determined by the:


- a. Statutory and regulatory requirements.
- b. Process performance and audit results.
- c. Level of risk and types of control measures.
- d. Trends in incidents or corrective actions.

Ongoing monitoring of normal operations includes the assessment of whether safety processes and safety procedures are followed correctly, and when they are not followed, investigations are carried out to determine and correct the root cause. TNCL achieves greater support for health and safety by involving our workers in monitoring.

Engineering controls are regularly inspected and tested to ensure their integrity. Engineering controls, including safety devices, are regularly inspected and tested to ensure their integrity, effectiveness, and correct operation.

Inspection, measuring, and testing equipment related to health and safety monitoring is identified, calibrated, maintained, stored, and used according to the manufacturer's instructions and/or specifications in relevant standards. Records of calibration are retained. Examples of inspection, measuring, and test equipment include.

- a. Vehicle & Equipment inspection
- b. Workplace Inspections,
- c. Sound level meters,
- d. Lux meters

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Effective monitoring of sickness absence and workplace health can alert the board to underlying problems that could seriously damage performance or result in accidents and long-term illness. The collection of workplace health and safety data can allow the board to benchmark our organisation's performance against others in our sector.

TNCL ensures that proactive measurements such as maintenance, testing, and examination of certain control measures and, in some circumstances, health surveillance are legal requirements; they are monitored for performance and compliance. Where required, health and medical surveillance is planned and is sufficient to:

- a. Identify occupational ill health in workers, where any exposure could reasonably give rise to an identifiable condition, with valid detection measures.
- b. Identify any trends or clusters of occupational ill health.
- c. Identify if control measures are effective.

Reference:

TNCL-OHS-SOP-0035, Monitoring, Measurement, Analysis, and Evaluation Procedure
 TNCL-OHS-REG-0009, Performance Monitoring and Evaluation Register

9.1.1. Evaluation of Compliance


TNCL has established, implemented, and maintained a procedure for periodic evaluation of compliance with applicable legal requirements.

TNCL has:

- a. The frequency of compliance will be evaluated.
- b. Evaluated compliance with other requirements to which it subscribes and took action if needed.
- c. Maintained knowledge and understanding of its compliance status with legal requirements and other requirements.

Reference:

TNCL-OHS-REG-0009, Performance Monitoring and Evaluation Register
 TNCL-OHS-REG-0011, Evaluation of Legal Compliance Register

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9.2. Internal audit

TNCL shall conduct internal audits at planned intervals to provide information on whether the OHS management system:

- a. Conforms to:
 - The organisation's requirements for its OHS management system.
 - The requirements of the Internationally Recognized Standards.
- b. It is effectively implemented and maintained.

9.2.1. Internal Audit Programme

TNCL:

- a. Has planned, established, implemented, and maintained an audit program, including the frequency, methods, responsibilities, planning requirements, and reporting, which takes into consideration the importance of the processes concerned, changes affecting the organisation, and the results of previous audits.
- b. Has defined the audit criteria and scope for each audit.
- c. Has selected auditors and conducted audits to ensure objectivity and the impartiality of the audit process.
- d. Ensures that the results of the audits are reported to relevant management.
- e. Takes appropriate correction and corrective actions without undue delay and continually improves its OHS performance.
- f. Retains documented information as evidence of the implementation of the audit program and the audit results.


Reference:

TNCL-OHS-SOP-0036, Internal Audit Procedure

TNCL-OHS-REG-0017, Internal Audit program.

TNCL-OHS-REP-0003, Internal Audit reports.

TNCL-OHS-FRM-0085, Nonconformity and Corrective Action Request

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9.3. Management Review

TNCL's management shall review the OHS management system at planned intervals to ensure its continuing suitability, adequacy, effectiveness, and alignment with the strategic direction of the organisation. The management review shall consider the following:

- a. The status of actions from previous management reviews.
- b. Changes in:
 - i. External and internal issues that are relevant to the OHS management system.
 - ii. The needs and expectations of interested parties,
 - iii. Legal requirements and other requirements.
 - iv. Risks and opportunities.
- c. The extent to which the OHS policies and the OHS objectives have been met.
- d. Information on the performance and effectiveness of the OHS management system, including trends in:
 - i. Incidents, non-conformities, and corrective actions.
 - ii. Monitoring and measurement results.
 - iii. Fulfilment of its legal requirements and other requirements.
 - iv. Audit results.
 - v. Consultation and participation of workers.
- e. The adequacy of resources for maintaining an effective OHS management system.
- f. Relevant communication with interested parties
- g. The effectiveness of actions taken to address risks and opportunities.
- h. Opportunities for improvement.

9.3.1. *The Outputs of the Management shall include:*

- a. The continuing suitability, adequacy, and effectiveness of the OHS management system in achieving its intended outcomes.
- b. Opportunities for improvement.
- c. Any need for changes to the OHS management system.
- d. Resource needed.
- e. Actions, if needed.
- f. Opportunities to improve integration of the OHS management system with other business processes.
- g. Any implications for the strategic direction of the organisation.

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TNCL's top management shall communicate the relevant outputs of management reviews to workers and workers' representatives. TNCL shall retain documented information as evidence of the results of management reviews.

Reference:

TNCL-OHS-SOP-0037, Management Review Procedure


TNCL-OHS-REP-0004, Management Review Report

10. IMPROVEMENT

The OHS Manager uses a range of the performance evaluation tools highlighted in Section 9 to make recommendations for improvement and to achieve the intended outcomes of our health and safety management system. Recommendations may emerge from workers' or interested party suggestions or concerns, Health & Safety Committee meetings, hazard reviews, task analysis, physical inspections, and internal audit findings.

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

- a. Risk and opportunity evaluations.
- b. Assessment of the changing needs and expectations of interested parties.
- c. Assessment of the changing needs of the business.
- d. The conformity of existing operations, products, and services.
- e. The effectiveness of our health and safety management system and trends.
 - i. Accident, Incident Frequency Rate (TIFR);
 - ii. Several Incident Reports.
 - iii. Total Recordable Injury Rate.
 - iv. Injuries beyond First Aid at work.
 - v. Near Miss Reports.
 - vi. Property Damage Incidents.
 - vii. Vehicle Incidents.

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- viii. Occupational Illnesses.
- ix. Complaints.
- x. Insurance claims.
- f. Supplier/contractor's performance.
- g. Reducing or eliminating adverse OH&S hazards.
- h. Complaints and feedback.
- i. Internal and external audit results.
- j. Corrective action and non-conformance rates.


TNCL also ensures that opportunities for improvement from daily feedback on operational performance are evaluated by the OHS Manager as appropriate. Changes are typically implemented through the corrective action system.

10.1. Incident, Nonconformity, and Corrective Action

10.1.1. Incident Investigation

TNCL has implemented the *Incident Investigation Procedure* for the handling of and the investigation of accidents, incidents, and near misses. The procedure defines the controls for reporting and establishing the root cause of all types of accidents, incidents, or near misses that may occur on our premises. Any staff member who is involved in an accident, near miss, or any dangerous incident must report the occurrence.

Proper incident reporting followed by thorough investigation, root-cause analysis, and then applying and monitoring the effectiveness of remedial actions are key components to control risks and prevent a recurrence. Prompt and accurate communication of these results is essential to prevent similar incidents in the future.

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10.1.2. Non-conformity & Corrective Action

When a nonconformity occurs, including any arising from complaints, TNCL shall:

- a. React promptly to the incident or nonconformity and, as applicable:
 - i. Takes action to control and correct it.
 - ii. Deals with the consequences.
- b. Evaluate, with the participation of workers and the involvement of other relevant interested parties, the need for corrective action to eliminate the root causes of the incident or nonconformity so that it does not recur or occur elsewhere by:
 - i. Investigating the incident or reviewing the nonconformity.
 - ii. Determining the cause(s) of the incident or nonconformity.
 - iii. Determining if similar incidents have occurred, if nonconformities exist, or if they could potentially occur.
- c. Review existing assessments of OHS risks and other risks, as appropriate.
- d. Determine and implement any action needed, including corrective action, following the hierarchy of controls and the management of change.
- e. Assess OHS risks that relate to new or changed hazards before acting.
- f. Review the effectiveness of any action taken, including corrective action.
- g. Updates risks and opportunities determined during planning, if necessary.
- h. Make changes to the OHS management system, if necessary.

Corrective actions shall be appropriate to the effects or potential effects of the incidents or nonconformities encountered. TNCL shall retain documented information as evidence of the following:


- i. The nature of the incidents or nonconformities and any subsequent actions taken.
- ii. The results of any action and corrective action, including their effectiveness.

TNCL shall communicate this documented information to relevant workers workers' representatives and other relevant interested parties.

Reference:

TNCL-OHS-FRM-0085, Non-Conformity and Corrective Action Report Form

TNCL-OHS-REG-0018, Non-Conformity register.

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10.2. Continual Improvement

TNCL shall continually improve the suitability, adequacy, and effectiveness of the OHS management system by:

- a. Enhancing OH&S performance.
- b. Promoting a culture that supports an OH&S management system.
- c. Promoting the participation of workers in implementing actions for the continual improvement of the OH&S management system.
- d. Communicating the relevant results of continual improvement to workers and, where they exist, workers' representatives.
- e. Maintaining and retaining documented information as evidence of continual improvement.

TNCL shall consider the results of the analysis and evaluation and the outputs from the management review to determine if some needs or opportunities should be addressed as part of the continual improvement.


11. SYSTEM EVALUATION

This manual shall be reviewed at least two years by members of the OHS Department and presented to the Standard Committee for approval, or when organizational changes take place or are required as part of internal and external audits. The TNCL Document Controller will monitor compliance with the document control system on an ongoing basis.

12. DISTRIBUTION

List physical locations which require a controlled copy of this document.

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

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13. CONTRAVENTION

Any breach of this procedure shall be regarded as refusal/failure to carry out a lawful instruction and will be dealt with as per the disciplinary procedure.


14. DOCUMENT CHANGE PROCESS

The process of document change starts when the document custodian identifies there is a need to make changes within the document. The document custodian/ owner shall complete the document change request form, sign it off, and submit it to the Document Controller.

The Document controller shall issue the controlled word copy of the document to the respective document custodian/owner so that changes may be made. The document custodian/owner shall resubmit the updated document to the document controller so that the document can be controlled and updated within the Filing system ready for use by the end users.

14.1. Reason for Change

A	As a result of incidents	F	Change in training requirements
B	As a result of the audit findings	G	Results of Risk Assessment
C	New / changes in governance documents	H	Change due to spelling or grammatical error
D	Change in legislation	I	New document format
E	Change in technology	J	To integrate special instruction into the document control system


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14.2. History of Change

Date of Change	Revised Item (paragraph number reference required)	Reason for Change	Name of Reviewer
March 2024	Ref: Sections 6.1; 6.2.2.2; 8.1	J	A. Waria
March 2024	General review	B	A. Waria
March 2024	Header and Footer	I	W. Nshimah
March 2024	Page 44	I	W. Nshimah

15. RECORD CONTROL


Document Title:	Document ID:	Responsible for Maintenance:	Responsible for Filling:	Location of Storage:	Retention Period:	Method of Disposal:
OHS Management System Manual	TNCL-OHS-MAN-0001	Document Controller	Document controller	OHS Department	Hard copy two years	Hard copy shared file electronic

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16. DECLARATION

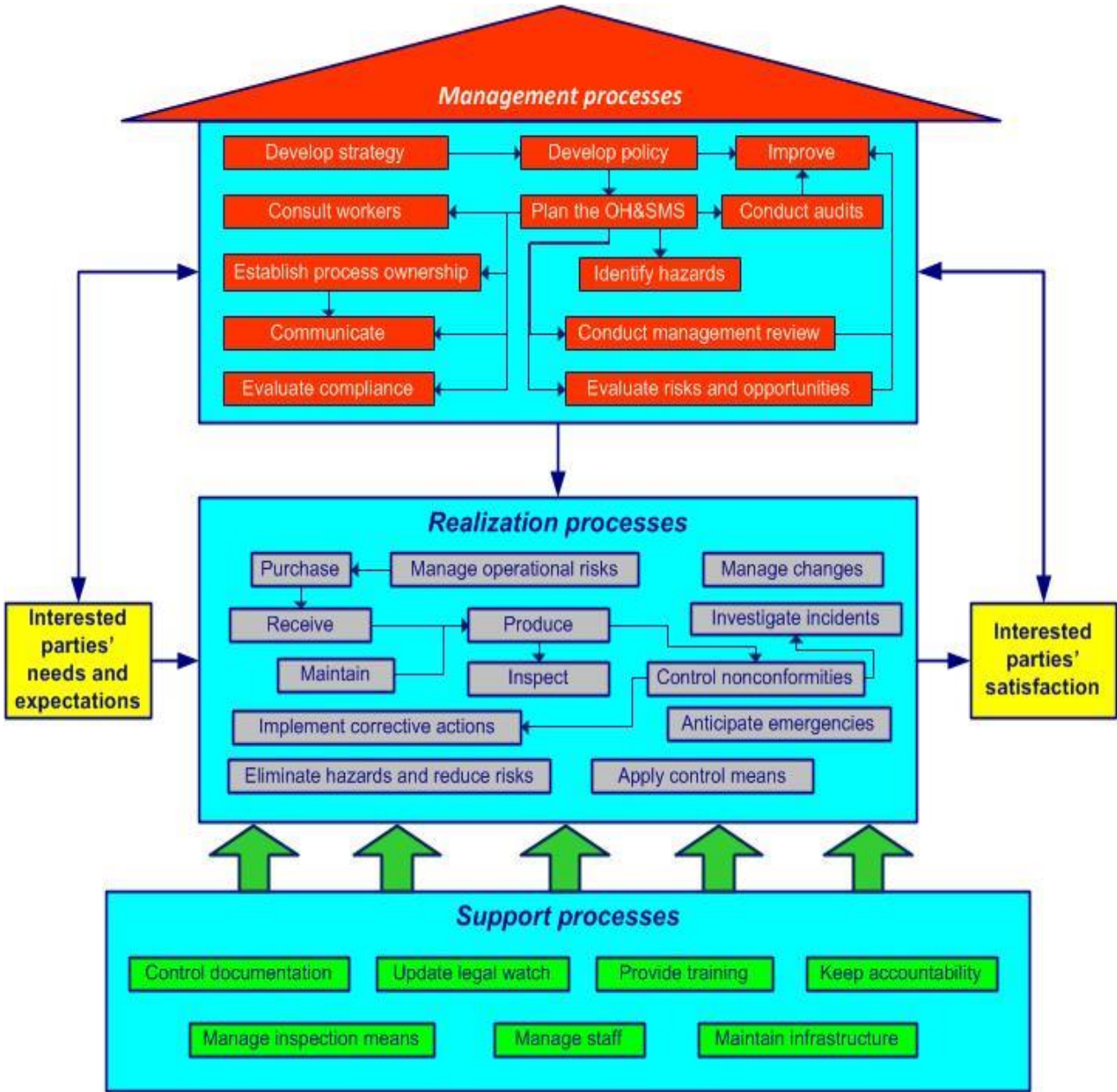
I hereby declare that I have taken part in the discussion of this manual, and I understand its contents and do commit that I shall ensure compliance hereto:


	Name and Surname	Company Number	Designation / Role	Signature	Date Signed
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APPENDIX A1: MANAGEMENT SYSTEM INTERACTION MAP

Figure 7: Management system interaction map



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APPENDIX A2. ORGANISATION CHART

Figure 8: Organisation Chart

