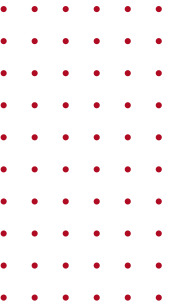


HEALTH, SAFETY & ENVIRONMENT POLICY

ESHRAQAT ALBADR CO.

JAN-2024



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Introduction:

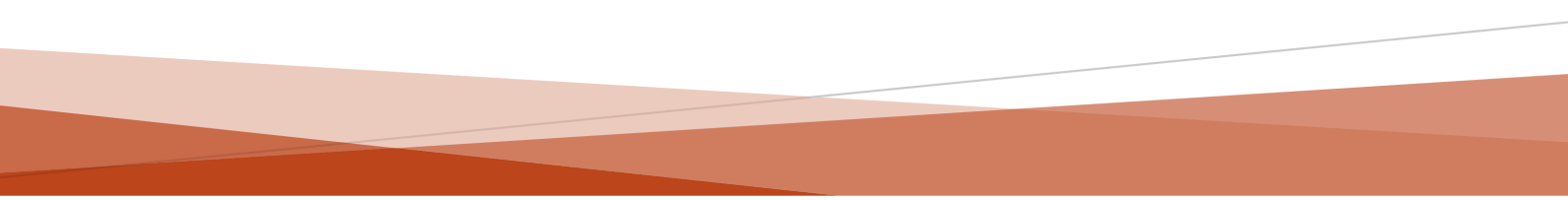
Eshraquat Albadr Co. recognizes that the long-term success of our business depends on our ability to protect the health and safety of our people, our contractors, and the communities where we operate, while minimizing our environmental footprint. This HSE Policy sets out the principles and commitments that guide every level of our organisation. It establishes the expectations for behaviour, resources and systems that will enable us to perform our work safely and sustainably. This document is the corporate statement of intent; it is supported by detailed procedures, job-specific safe work practices and site level instructions that together form our HSE Management System.

How to use this policy

This document is intended to be read by employees, supervisors, management, contractors, clients and regulators. For operational guidance, refer to the associated HSE Manual and the annexes that include checklists, permit forms, inspection templates and incident report forms. The HSE department is responsible for maintaining the manual and for coordinating reviews and updates to this policy.

Distribution and access:

A copy of this policy is available on the company intranet and a summary is posted at all major sites and entrances. All new employees and contractor representatives will receive this policy as part of their site induction and must acknowledge understanding in writing.



1. Policy Statement

Policy Statement:

Eshraqat Albadr Co. is committed to integrating Health, Safety and Environmental (HSE) principles into all business decisions and activities. We strive for zero harm and for environmental stewardship. We will:

- Provide safe and healthy workplaces through hazard identification, risk assessment and risk control.
- Comply with applicable legal and other requirements, client standards and our own internal commitments (including ISO management systems).
- Provide resources and training so that everyone is competent to carry out their duties safely.
- Investigate incidents, learn lessons and implement corrective actions to prevent recurrence.

2. Purpose & Scope

Purpose:

The purpose of this policy is to set out our HSE commitments and provide a framework for establishing objectives, procedures and responsibilities to manage HSE risks across the company's operations.

Scope:

This policy applies to all personnel working for or on behalf of Eshraqat Albadr Co. including employees, contractors, temporary staff, visitors and suppliers. It covers all company operations, projects, sites, offices and vehicles in Iraq and any overseas activities carried out under the company's control. Where local regulations impose higher standards, those will apply.

Corporate commitments include ensuring that all projects are planned with HSE integrated from design through to decommissioning; that contractors are selected with consideration for HSE performance and that suppliers provide materials and equipment that meet our HSE requirements. We recognise the importance of community engagement and will assess and manage potential impacts on local communities and the environment before works commence.

3. Roles & Responsibilities

Management Responsibilities:

Senior management is accountable for establishing a positive HSE culture and for ensuring the allocation of sufficient resources to implement this policy.

Specific management responsibilities include:

- Setting clear HSE objectives and measurable targets and reviewing performance at regular management meetings.
- Ensuring HSE is considered in business planning, procurement and contract award decisions.
- Approving HSE plans for major projects and monitoring contractor HSE performance.
- Supporting employees who raise concerns or stop unsafe work, and ensuring non-retaliation policies are enforced.

Supervisors and Line Managers:

Supervisors translate policy into safe work practices. Their responsibilities include conducting pre-job risk assessments (JHAs), leading toolbox talks, ensuring workers are competent and authorised for tasks, enforcing permit-to-work systems, and taking immediate action to remove or control hazards.

Supervisors are also responsible for initial incident notification and for preserving evidence for investigations.

Employees:

Each employee must take personal responsibility for safety: follow procedures, attend required training, wear PPE correctly, report hazards, and exercise Stop Work Authority if they consider a task unsafe. Participation in safety committees and near-miss reporting is encouraged.

Contractors, Suppliers and Visitors:

Contractors must provide competent workers, their own risk assessments, and comply with site HSE rules. Visitors are required to undergo a site induction and be accompanied while on site. Failure to meet HSE expectations may result in removal from site and contractual remedies.

4. Hazard Identification & Risk Management

Approach to Risk Management:

Eshraqat Albadr adopts a proactive, risk-based approach to identify, evaluate and control hazards. This includes routine workplace inspections, job hazard analyses (JHAs) prior to high-risk tasks, permit-to-work for critical activities and management of change (MOC) procedures when processes, equipment or materials change. Risk assessments are documented and retained as part of the project records.

Typical steps in risk assessment:

1. Identify hazards associated with the activity or asset.
2. Evaluate the level of risk (likelihood x consequence).
3. Determine and implement controls using the Hierarchy of Controls.
4. Verify that controls are effective through monitoring and inspections.
5. Review and update the assessment when conditions change.

5. Safe Work Practices (Selected examples)

Working at Height:

- Only trained and authorised personnel shall work at height. Use fall prevention and arrest systems, ensure scaffolds are certified, and perform pre-use inspections.

Confined Space Entry:

- Confined space entry requires a permit, atmospheric testing, ventilation, a standby attendant and rescue arrangements. Entry is only permitted after all controls are in place.

Hot Work:

- Hot work (welding, cutting) is controlled by a hot work permit. Surrounding areas must be cleared of combustibles, and a fire watch must be present.

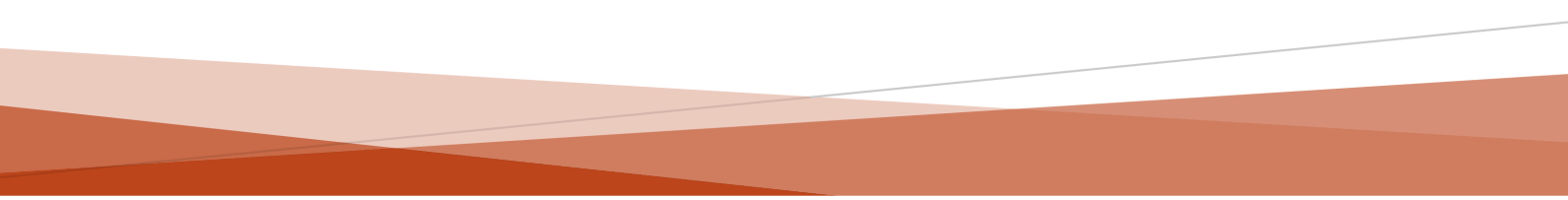
Electrical Safety and Lockout/Tagout:

- Isolation procedures shall be used for electrical and mechanical energy sources. Only authorised electricians shall perform live work and appropriate PPE must be worn.

Vehicle and Mobile Equipment Safety:

- Drivers/operators must be licensed and trained. Pre-start checks, safe loading/unloading procedures and designated traffic management plans must be followed.

Handling Hazardous Materials:

- SDSs must be available for all chemicals. Storage, segregation and disposal follow legal and company requirements. Spill kits and containment measures must be on site.
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6. Occupational Health & Wellbeing

Occupational Health:

We identify workplace exposures to physical, chemical and biological agents and apply controls to keep exposures within acceptable limits. Health surveillance is provided for roles with specific risks (hearing tests, respiratory function, vaccinations as appropriate). We maintain first-aid facilities and trained first-aiders on larger sites. Return-to-work and rehabilitation programs are available to support injured workers.

Wellbeing and Mental Health:

Eshraqat Albadr recognizes mental wellbeing as part of occupational health. We promote work-life balance, manage fatigue through rostering controls on extended shifts, and provide access to confidential support services when needed.

7. Environmental Stewardship

Environmental management focuses on preventing pollution, responsible waste management, and protecting local ecosystems. Key measures include waste segregation, authorized disposal of hazardous waste, erosion and sediment control, dust suppression, and water management to prevent contamination of local watercourses. We track energy use and seek opportunities to reduce greenhouse gas emissions through equipment maintenance, operational efficiencies and where possible, fuel-efficient vehicles.

8. Training, Communication & Incident Management

Training and Competence:

All workers receive induction training before starting work on site. Job-specific training (e.g., crane operation, electrical safety) is delivered by qualified trainers and recorded. Refresher training schedules are maintained.

Communication and Consultation:

Toolbox talks, HSE bulletins, site noticeboards and safety committees are used to keep HSE information current. We promote two-way communication and anonymous reporting where needed.

Incident Reporting and Investigation:

All incidents and near misses must be reported immediately via the company reporting system. Investigations follow a structured approach: secure the scene, collect evidence, interview witnesses, identify root causes (5-Whys or similar), and implement corrective and preventive actions. Lessons learned are shared across the organisation.

Performance Monitoring & Review:

We monitor leading (inspections completed, training hours) and lagging indicators (incident rates, lost time injuries) and conduct internal and external audits. Annual management reviews evaluate the effectiveness of the HSE system and set targets for the coming year.

Approval and Acknowledgement:

This policy is approved by the Managing Director: Saud Abdullah Bdaiwi.



Managing Director
Saud Abdullah Bdaiwi



Date: 09 January 2025

All employees and contractors are required to read and comply with this policy. Copies are available from the HSE Department. This is a controlled document; printed copies are uncontrolled.